State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
BUTLER COUNTY
Application No: 14-05591
DATE: 8/3/2004

M. Bohlke Veneer Corporation
Daniel Stapleton
2904 Symmes Road
Fairfield, OH 45014

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **$ 400** 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, 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. 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,

Michael W. Ahern

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

CC: USEPA HCDES OH-KY-IN Regional Council of Gov. KY IN

BUTLER COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05591** FOR AN AIR CONTAMINANT SOURCE FOR
M. BOHLKE VENEER CORPORATION

On 8/3/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **M. Bohlke Veneer Corporation**, located at **2904 Symmes Road, Fairfield**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05591:

Administrative Modification of PTI 18-079, issued 4/24/1979, for a Veneer Mill Wood and Bark Waste Combustion Boiler.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]

DRAFT MODIFICATION OF PERMIT TO INSTALL 14-05591

Application Number:	14-05591
APS Premise Number:	1409030403
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	M. Bohlke Veneer Corporation
Person to Contact:	Daniel Stapleton
Address:	2904 Symmes Road Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:
2904 Symmes Road
Fairfield, **Ohio**

Description of proposed emissions unit(s):
Administrative Modification of PTI 18-079, issued 4/24/1979, for a Veneer Mill Wood and Bark Waste Combustion Boiler.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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

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.

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit 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. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit..

14. 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 source.

15. 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.

B. 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

Pollutant	Tons Per Year
PE/PM10	20.6
CO	35.3
NOx	12.9
SO2	1.5
VOC	1.0

Emissions Unit ID: **B001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-17-10(C)(1) OAC rule 3745-21-08
B001 - 15 MMBtu/hr Konus Dutch Oven-type Wood-fired Heat Exchanger w/Multiclone - Modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-23-06(B)
	OAC rule 3745-35-07(B)	
	OAC rule 3745-17-07(A)(1)	

Applicable Emissions Limitations/Control Measures
0.60 lb CO/MMBtu 0.22 lb NOx/MMBtu 0.025 lb SO2/MMBtu 0.017 lb VOC/MMBtu
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(C)(1), OAC rule 3745-21-08, OAC rule 3745-23-06(B) and OAC rule 3745-35-07(B).
The following emission limits are based on a rolling, 12-month period: 20.6 TPY PE/PM10 35.3 TPY CO 12.9 TPY NOx 1.5 TPY SO2 1.0 TPY VOC
See terms A.2.c and B.1.
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
0.35 lb PE/PM10/MMBtu
See term A.2.d
See term A.2.e

2. Additional Terms and Conditions

2.a The CO, NOx, SO2, and VOC pounds per MMBtu emission limitations outlined in term A.1. are based on the emission unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a multicyclone system, and compliance with the emission limits, opacity limitations, and annual wood usage restriction.

2.c The total allowable emissions of carbon monoxide (CO) from emissions units B001 (15 MMBtu/hr wood-fired heater exchanger), B002 (17.8 MMBtu/hr wood-fired heat exchanger Permit to Install #14-00930), and B003 (13.7 MMBtu/hr wood-fired heat exchanger Permit to Install #14-04276), shall not exceed 96 TPY CO. Compliance with the above limitation shall be based on a rolling, 12-month summation of the CO emissions.

2.d The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.e The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

B. Operational Restrictions

1. The maximum annual wood usage rate for this emissions unit shall not exceed 9100 tons, based upon a rolling, 12-month summation of the wood usage. The company has existing records, therefore first year monthly wood usage amounts are not necessary.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the wood usage rate for each month and the updated, rolling, 12-month summation for wood usage, in tons, for emissions unit B001 (the total amount of wood burned for the current month plus the total amount of wood burned for the previous eleven calendar months).

2. The permittee shall maintain monthly records of the PE/PM10, CO, NOx, SO2 and VOC emissions for each month and the updated, rolling, 12-month summation for the PE/PM10, CO, NOx, SO2 and VOC emissions, in tons, for emissions unit B001 (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

3. The permittee shall maintain monthly records of the updated, rolling, 12-month summation for CO emissions, in tons, for emissions units B001, B002, and B003 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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

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

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

   a. an identification of all exceedances of the rolling, 12-month wood usage restriction for this emissions unit;

   b. an identification of all exceedances of the rolling, 12-month emission limitations of PE/PM10, CO, NOx, SO2 and VOC for this emissions unit.

2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

3. The permittee shall submit quarterly reports which identify the updated rolling, 12-month summation of CO emissions for each calendar month for emissions units B001, B002, and B003 combined, as specified in term A.2.c. The reports shall be submitted to the Hamilton County Department of Environmental Services-Air Quality Management Division by January 31, April 30, July 31, and October 31 of each year and shall cover the previous three calendar months.

4. 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 which are not representative of normal operations and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Hamilton County Department of Environmental Services-Air Quality Management Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

5. The permittee shall submit annual reports that specify the total PE/PM10, NOx, CO, SO2, and VOC emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. The reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations and operating limitations specified in Sections A and B shall be determined by the following methods:

   a. Emission Limitation(s):
   0.60 lb CO/MMBtu
   0.22 lb NOx/MMBtu
   0.025 lb SO2/MMBtu
   0.017 lb VOC/MMBtu

   Applicable Compliance Method: These emission limitations are based upon the emission unit's potential to emit and related emissions factors found in USEPA AP-42, Fifth Edition, Section 1.6 Wood Residue Combustion in Boilers, Tables 1-6.2 and 1.6-3 (revised 9/2003).

   If required, the permittee shall demonstrate compliance with the CO emission limitation through emission tests performed in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

   If required, the permittee shall demonstrate compliance with the NOx emission limitation through emission tests performed in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

If required, the permittee shall demonstrate compliance with the SO2 emission limitation through emission tests performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

If required, the permittee shall demonstrate compliance with the VOC emission limitation through emission tests performed in accordance with Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:
0.35 lb PE/PM10/MMBtu

Applicable Compliance Method: The PE/PM10 emission limitation is based upon the rated heat input of the emission unit (15 MMBtu/hr) and the equation specified in OAC rule 3745-17-10(C)(1).

The permittee shall demonstrate compliance with the PE/PM10 emission limitation based upon the results of emission testing required in Section E.2. of this permit.

c. Emissions limitation(s):
20.6 TPY PE/PM10*
35.3 TPY CO*
12.9 TPY NOx*
1.5 TPY SO2*
1.0 TPY VOC*
*These emission limitations are per rolling, 12-month summation

Applicable Compliance Method: Compliance with the above emission limitations may be demonstrated by the record keeping requirements specified in Section C.1 and C.2, emission test data for PE/PM10, and related emissions factors found in USEPA AP-42, Fifth Edition, Section 1.6 Wood Residue Combustion in Boilers, Tables 1.6-2 and 1.6-3 (revised 9/2003).

d. Emissions limitation:
Visible PE shall not exceed 20 percent opacity, as a 6-minute average.

Applicable Compliance Method: If required, compliance shall be demonstrated by the methods specified in 40 CFR 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emissions limitation:
96 TPY CO for B001, B002, and B003 combined, as a rolling 12-month summation

Applicable Compliance Method: Compliance with the above CO emission limitation specified in term A.2.c shall be demonstrated by the record keeping requirements in Section C.3.

f. Operating Restriction:
The maximum wood usage rate for this emissions unit shall not exceed 9100 tons, based upon a rolling, 12-month summation of the wood usage.

Applicable Compliance Method: Compliance with the wood usage restriction shall be demonstrated by the record keeping requirements in Section C.1.

2. If not previously conducted and reported, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within six months after issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate of 0.35 lb PE/MMBtu.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 5 of 40 CFR Part 60, Appendix A for particulate

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

d. The test(s)shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services 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 on the results of the emissions test(s) shall be signed by

the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 18-079 as issued on April 24, 1979.

2. The following terms and conditions of this permit are federally enforceable: Sections A, B, C, D, and E.