John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

12/12/2014

Certified Mail

Vaughn Bentz
Sauder Woodworking Cogeneration Facility
502 Middle St.
Archbold, OH 43502

Facility ID: 0326000079
Permit Number: P0117720
County: Fulton

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 10/27/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0326000079
Facility Name:	Sauder Woodworking Cogeneration Facility
Facility Description:	Bio-mass Electric Power Generation
Facility Address:	502 Middle St. Archbold, OH 43502 Fulton County
Permit:	P0117720, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Fulton County Expositor on 10/30/2014. The comment period ended on 11/29/2014.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Facility Description

a. Comment: Public Notice and Statement of Basis: The facility is not a “fossil” fuel; our fuel is bio-mass.

Response: The facility description has been updated to reflect that it utilizes bio-mass not fossil fuel.

2. Topic: Statement of Basis

a. Comment: The facility is subject to Title V because it is major for MACT. MACT was not checked.

b. Comment: The filterable PM/TSM emission limitations per MACT Subpart DDDDD should be updated to reflect the changes in term and condition C.1.b)(1)g.

Response: The statement of basis has been updated to reflect the changes.

3. Topic: Standard Terms and Conditions

a. Comment: A.2.c)(1)(5th paragraph) states “Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable

emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions." 3745-15-06(A)(1) does not address "submitted maintenance requests." 3745-15-06(A)(3) addresses scheduled maintenance of air pollution control equipment where the owner/operator may request authorization to continue operating the emission source during the scheduled maintenance of air pollution control equipment. Should the rule reference in the permit be 3745-15-06(A)(3)?

Response: Comments regarding the Standard Terms and Conditions are forwarded to our Central Office for review, as those terms are not generated by the field office.

4. Topic: MACT Subpart DDDDD Reference

a. Comment: C.1.b)(1)g. should read 5.1E-02 lb filterable PM per mmBtu of heat input; or 6.5E-03 lb TSM per mmBtu of heat input and 5.2E-02 lb filterable PM per mmBtu of steam output; or 7.1E-01 lb filterable PM per MWh; or 6.6E-03 lb TSM per mmBtu of steam output; or 9.1E-02 lb TSM per MWh.

b. Comment: C.1.b)(2)c. Fuel Analyses, Specification and Procedures – 63.7521(h) refers to gaseous fuels. The facility uses natural gas for startup according to 63.7521(a), "you are not required to conduct fuel analyses for fuels used for only startup, unit shutdown, and transient flame stability purposes."

Response: The requested changes have been made. Additionally, the emissions units descriptions have been adjusted to reflect that the facility only uses natural gas during startup and does not rely on it as a fuel source during regular operation.

5. Topic: CEMS/COMS Language

a. Comment: C.1.d)(2)b.i. What is the regulatory basis for the phrase "with no resolution less than one data point per minute required?" 60.13(e)(2) states "All continuous monitoring systems referenced by paragraph (c) of this section for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing and data recording) for each successive 15-minute period."

Response: Ohio EPA would use 40 CFR 60.7(f)(3) as the justification for this requirement. Furthermore, 64 FR 7459 (February 12, 1999) #2 (Reduction in Retention of Sub-Hourly Data for CEMS) supports Ohio EPA's stance for requiring data points to be collected at one point per minute. Instantaneous readings ensure that the source does not choose data used to show compliance with the relevant standard and also allows for the review of the data trends or problems. This requirement also keeps systems from being set up to record data on a less than continuous basis.

b. Comment: C.1.e)(1)a.ii.(c) and C.1.e)(2)a.ii.(c) requires the quarterly reports to include "a description of any change in the equipment that comprises the COMS/CEMS, including any hardware, changes to the software that may affect COMS/CEMS readings and/or changes in the location of the COMS/CEMS sample probe. It appears that this would have to be another statement added to our quarterly report that we certify we have or have not made any changes. We are unable to find any regulatory basis for this. 40 CFR 60.7(a)(4) stats that "A notification of any physical or operational change to an existing facility **which may increase the emission rate**…" The wording in the permit states "any change". What is the regulatory basis for this wording?

Response: This comment is mixing changes to the COMS/CEMS with changes to the emissions unit itself. The COMS/CEMS equipment that are in place at the time of the COMS/CEMS certification testing are certified to be used for providing compliance demonstration data. If analyzers, sample line, sample conditioning systems sampling condition systems or DAHS software is changed, or the sampling location is changed, the COMS/CEMS are no longer considered certified for providing compliance data (without going through certification testing with the new equipment in place.) The reporting requirement assures that if there is a change to the COMS/CEMS, we are made aware of it and can address it accordingly. The increased emission rate argument is a permitting argument, not a COMS/CEMS argument.

c. Comment: C.1.e)(1)a.ii.(h) and C.1.e)(2)a.ii.(l) **refers to a note that states "each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit. 40 CFR 60.7)(b) states you must "maintain records," it does not state that you have to report each downtime and malfunction event regardless of whether there is an exceedance. We currently maintain a maintenance tracking program where any maintenance required, either preventative or as a result of a breakdown, is tracked in this program. This requirement to report every malfunction regardless of whether there is an exceedance of the emission limit is over-burdensome and does not add any value to demonstrating compliance with the permit limits. We request an exemption to this requirement in our permit.

Response: 40 CFR 60.7(c)(3) requires "the date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments" to be reported. A downtime and malfunction of the COMS/CEMS would be considered a time it was inoperable as the data collected during that time period is not reliable. Furthermore, Ohio EPA requires malfunctions be reported pursuant to OAC rule 3745-15-06(B).

d. Comment: C.1.e)(2)a.i. requires "documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-17 and 3745-23. If the facility does not participate in the NOx Budget Trading Program, are they still subject to the rules and does it apply to the permitting levels? Does this only come into play if they decide to participate?

Response: The rule references identified above are an all-inclusive lists of regulations that could be driving the CEMS requirements should you be subject to them. As such, since the facility does not participate in the NOx Budget Trading Program, they are not subject to the rules nor the permitting levels associated with said rules. This will only come into play should the facility decide to participate in the program.

e. Comment: C.1.e)(2)a.ii.(h) requires the quarterly deviation reports to include "results and dates of quarterly cylinder gas audits." The facility currently has to submit a Quarterly Excess Emissions Report (EER) and a Summary Report. It is already required of them to include on the EER CEMS downtime due to quality audits. Requiring a third report which provides actual numerical results of the audit seems redundant. These numbers will only show whether or not the CEMS is out-of control. Should the audit reveal that the CEMS is out-of-control they would be required to redo the audit and report additional downtime and the reason for the downtime on the quarterly EER. They suggest including a statement in the EER that the results of the audit demonstrate that the CEMS was or was not out-of-control. If the CEMS were found to be out of control, they would make statements regarding the corrective actions taken and that another audit was performed and the CEMS was now in compliance.

Response: The results and dates of quarterly cylinder gas audits are required as part of the Data Assessment Report (DAR) during the quarters these assessments are performed. Furthermore, Section 1.1 of 40 CFR Part 60 Subpart F states, "Data collected as a result of QA and QC measures required in this procedure [Procedure 1] are to be submitted to the Agency." The term will remain as stated in the draft permit.

6. Topic: Typographical Errors

a. Comment: C.1.e)(2)a.ii. lists the regulatory reference as [OAC rule 3745-77-01(C)(1)], should it be [OAC rule 3745-77-07(C)(1)]?

b. Comment: C.1.d)(1)b. and C.1.d)(2)b. the last sentence in the first paragraph should list the regulatory reference as 40 CFR Part 60.13.

Response: The typographical errors noted have been corrected.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Sauder Woodworking Cogeneration Facility

Facility ID:	0326000079
Permit Number:	P0117720
Permit Type:	Renewal
Issued:	12/12/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Sauder Woodworking Cogeneration Facility

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Authorization

Facility ID:	0326000079
Facility Description:	Bio-mass Electric Power Generation
Application Number(s):	A0051742
Permit Number:	P0117720
Permit Description:	Renewal Title V Permit for (2) 63.75 mmBtu/hr wood waste fired boilers with ESP.
Permit Type:	Renewal
Issue Date:	12/12/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087003

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Sauder Woodworking Cogeneration Facility
502 Middle St.
Archbold, OH 43502

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) 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 recordingsfor 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:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

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 OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) 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. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

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

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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))

6. 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))

7. General Requirements

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

11. 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))

12. 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))

13. 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

Officialthat, 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:

(1) 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.

(2) 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.

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

(4) 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 Ohio EPA DAPC, Northwest District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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 Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) 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.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) 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))

14. 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))

15. 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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))

16. 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))

17. 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 emissions 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.

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

18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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))

21. 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))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

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

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

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 theOhio EPA DAPC, Northwest District Office.

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 Ohio EPA DAPC, Northwest District Office. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. 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.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Northwest District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
P002	Wood waste handling system with fabric filter [PTI 03-5740, issued 10/04/2007]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Boilers: B008,B009

EU ID	Operations, Property and/or Equipment Description
B008	63.75 MMBtu/hrWood Fired Boiler #1 with Natural Gas used during startup
B009	63.75 MMBtu/hrWood Fired Boiler #2 with Natural Gas used during startup

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 03-5740, issued 10/04/2007]	<u>From each emissions unit individually</u> 0.20 lb nitrogen oxides (NOx)/mmBtu of actual heat input 0.45 lb carbon monoxide (CO)/mmBtu of actual heat input 0.01 lb sulfur dioxide (SO2)/mmBtu of actual heat input 0.15 lb volatile organic compounds (VOC)/mmBtu of actual heat input 0.025 lb particulate emissions(PE)/ mmBtu of actual heat input when burning wood See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule, when burning natural gas.
c.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input when burning natural gas.
d.	OAC rule 3745-18-06	See b)(2)b.
e.	40 CFR, Part 60, Subpart Dc	Visible emissions shall not exceed 20% opacity, as a six-minute average, except

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		for one 6-minute period per hour of not more than 27 percent opacity when burning wood. See b)(2)b.
f.	40 CFR 63.1-15 [40 CFR 63.7565]	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDD shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	40 CFR, Part 63, Subpart DDDDD [40 CFR 63.7480-63.7575] [In accordance with 40 CFR 63.7575, these emissions unitsare existing boilers (suspension burners) designed to burn solid fuels (biomass solid) located at a major source of HAP emissions. These emissions units shall be in compliance with this rule no later than January 31, 2016 or as otherwise updated by this rule.]	See b)(2)c., c)(4), d)(6), e)(6) and f)(3). The emissions from the boiler shall not exceed the following emission limitations, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in: Table 2 for existing units: <u>When firing Biomass Fuels (Wood):</u> 2.2E-02 lb Hydrogen Chloride (HCl) per MMBtu of actual heat input 5.7E.06 lb Mercury (Hg) per MMBtu of actual heat input 2400 ppm carbon monoxide (CO) by volume on a dry basis corrected to 3 percent oxygen, 3-run average; or 2000 ppm CO by volume on a dry basis corrected to 3 percent oxygen, 10-day rolling average 5.1E-02 lb filterable Particulate Matter (PM) of heat input; or 6.5E-03 lb Total Selected Metals (TSM) per MMBtu of heat input **ORoutput limits (option)** 2.5E-02 lbHCl per MMBtu of steam output or 0.27 lbHCl per Megawatt Hour (MWh) 6.4E-06 lb Hg per MMBtu of steam output or 7.3E-05 lb Hg per MWh

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.9 lb CO per MMBtu of steam output or 27 lb CO per MWh, 3-run average 5.2E-02 lb filterable PM per MMBtu of steam output; or 7.1E-01 lb filterable PM per MWh; or 6.6E-03 lb TSM per MMBtu of steam output; or 9.1E-02 lb TSM per MWh Boilers subject to emission standards in Table 2 shall also meet the work practice standards identified in Table 3 during startup and shutdown of the unit and the tune-up requirements, as applicable, in Table 3. The permittee shall demonstrate compliance with the limits published in the final amendments to Subpart DDDDD, as required by the subpart.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B) and 40 CFR, Part 60, Subpart Dc.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. This emissions unit meets the definition of existing boilers or process heaters with a heat input capacity of greater than 10 mmBtu per hour; therefore, the following requirements found in 40 CFR, Part 63, Subpart DDDDD are applicable:

Work Practice Standards	63.7500(a)(1) – (a)(3), (f) and Table 3
Operating Limits	63.7500(a)(2) and Table 4
General Compliance Requirements	63.7505(a), (c), (d)(1) –(d)(4), 63.7515(d), 63.7540(a)(10), (a)(13), 63.7565 and Table 10
Fuel Analyses, Specification and Procedures	63.7510(a)(2)(ii), 63.7521(a) – (e) and Table 6
Initial Compliance Demonstration Requirements	63.7530(a) – (c), (e), (f), (h) and Table 7

Emissions Averaging	63.7522(a), (h) – (k)
Implementation and Enforcement	63.7570(a) and (b)

c) Operational Restrictions

(1) The permittee shall operate the cyclones and the SCR systems during any operation of this emissions unit.

[PTI 03-5740 and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall operate the ESP during any operation of this emissions unit, except during periods of startup and shutdown that are exempted pursuant to OAC 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC 3745-17-07(A)(3)(c).

[PTI 03-5740 and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall burn only natural gas and/or wood in this emissions unit. For the purpose of this permit, "wood" shall be defined as any of the wood waste generated at this facility. This wood waste primarily consists of cuttings from engineered wood such as particle board or plywood, but may also contain a small amount of plastic, laminate, or other material generated during the manufacturing process that is inherent in the making of wood furniture or wood furniture components.

[OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Monitoring, Installation, Operation and Maintenance Requirements	63.7525(a), (c), (l), Table 4 and Table 7

[40 CFR, Part 63, Subpart DDDDD]

d) Monitoring and/or Recordkeeping Requirements

(1) For the opacity monitor:

a. The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample

extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

b. The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

i. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;

ii. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

iii. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;

iv. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;

v. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,

vi. the reason (if known) and the corrective actions taken (if any) for each such event in (iv) and (v).

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B and PTI 03-5740]

(2) For the NOx monitor:

a. The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NOx monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

b. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to:

i. emissions of NOx in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

ii. emissions of NOx in units of the applicable standard(s) in the appropriate averaging period;

iii. results of quarterly cylinder gas audits;

iv. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

v. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

vi. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

vii. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

viii. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

ix. the reason (if known) and the corrective actions taken (if any) for each such event in (vii) and (viii).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F and PTI 03-5740]

(3) For each day during which the permittee burns a fuel other than natural gas and/or wood, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1)]

(4) The permittee shall maintain records documenting any time periods when the cyclone and/or SCR control systems were down when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain records documenting any time periods when the ESP (except during periods of startup and shutdown or during malfunctions) control system was down when the emissions unit was in operation.

[OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Record Keeping Requirements	63.7530(e), (f), 63.7555(a) – (d), (i), (j) and 63.7560(a) – (c)
Continuous Compliance Requirements	63.7535(a) – (d), 63.7540(a), (b) and (d) and Table 8

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

e) Reporting Requirements

(1) For the opacity monitor:

a. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:

i. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

ii. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

(a) the facility name and address;

(b) the manufacturer and model number of the continuous opacity monitor;

(c) a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect

COMS readings, and/or changes in the location of the COMS sample probe;

(d) the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

(e) the total operating time (hours) of the emissions unit;

(f) the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;

(g) the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;

(h) the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and

(i) the reason (if known) and the corrective actions taken (if any) for each event in (g) and (h).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of the opacity limit

[OAC rule 3745-77-07(C), 40 CFR 60.7 and PTI 03-5740]

(2) For the NOx monitor:

a. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:

i. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the

corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

ii. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

(a) the facility name and address;

(b) the manufacturer and model number of the continuous NOx and other associated monitors;

(c) a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

(d) the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

(e) the total NOx emissions for the calendar quarter (tons);

(f) the total operating time (hours) of the emissions unit;

(g) the total operating time of the continuous NOx monitoring system while the emissions unit was in operation;

(h) results and dates of quarterly cylinder gas audits;

(i) unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

(j) unless previously submitted, the results of any relative accuracy test audit showing the continuous NOx monitor out-of-control and the compliant results following any corrective actions;

(k) the date, time, and duration of any/each malfunction** of the continuous NOx monitoring system, emissions unit, and/or control equipment;

(l) the date, time, and duration of any downtime** of the continuous NOx monitoring system and/or control equipment while the emissions unit was in operation; and

(m) the reason (if known) and the corrective actions taken (if any) for each event in (k) and (l).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C), 40 CFR 60.7 and PTI 03-5740]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or wood was burned in this emissions unit. Each report shall be submitted within 30 days following the end of each calendar quarter when the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

(4) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the cyclone and/or SCR control systems were down. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

(5) The permittee shall submit deviation (excursion) reports that identify any time periods when the emissions unit was in operation and the ESP (except during periods of startup and shutdown or during malfunctions) control system was down. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Reporting Requirements	63.7530(e), (f), 63.7545(a), (d), (e), (g), (h), 63.7550(a) – (e), (h) and Table 9

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

f) Testing Requirements

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

a. <u>Emission Limitations:</u>

From each emissions unit individually:

0.025 lb PE/mmBtu of actual heat input, when burning wood

Applicable Compliance Method:

The permittee has demonstrated compliance with the 0.025lbPE/mmBtu emission limitation through stack testing conducted on November 14, 2013 and November 13, 2013 for B008 and B009, respectively.

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

From each emissions unit individually:

0.20 lbNOx/mmBtu of actual heat input

Applicable Compliance Method:

Ongoing compliance with the 0.20 lbNOx/mmBtu emission limitation shall be demonstrated through the data collected as required in the monitoring and record keeping in d)(2), and through demonstration of compliance with the quality assurance/quality control plan which shall meet the testing and recertification requirements of 40 CFR, Part 60.

If required, the permittee shall demonstrate compliance with this emission limitation by conducting emission testing in accordance with the requirements specified in Methods 1 through 4, and 7 of 40 CFR, Part 60, Appendix A.

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

From each emissions unit individually:

0.45 lb CO/mmBtu of actual heat input

Applicable Compliance Method:

The permittee has demonstrated compliance with the 0.45 lbCO/mmBtu emission limitation through stack testing conducted on November 14, 2013 and November 13, 2013 for B008 and B009, respectively.

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

From each emissions unit individually:

0.15 lb VOC/mmBtu of actual heat input

Applicable Compliance Method:

The permittee has demonstrated compliance with the 0.15 lb VOC/mmBtu emission limitation through stack testing conducted on November14, 2013 and November 13, 2013 for B008 and B009, respectively.

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

0.01 lb SO2/mmBtu of actual heat input from each emissions unit individually

Applicable Compliance Method:

Compliance with the 0.01 lb SO2/mmBtu emission limitation may be demonstrated by multiplying the emission factor from AP-42, Table 1.6-2 (revised 2/99) of 0.075 lb SO2/ton of wood burned by [1/the heat content of wood (mmBtu/ton)].

If required, the permittee shall demonstrate compliance with the lb SO2/mmBtu emission limitation above in accordance with Methods 1 – 4 and 6 of 40 CFR, Part 60, Appendix A.

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

0.020 lb PE/mmBtu of actual heat input, when burning only natural gas

Applicable Compliance Method:

Compliance with the 0.020 lb PE/mmBtu limitation may be demonstrated by multiplying the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft by [1/the heat content of natural gas (mmBtu/mm cu. ft)].

If required, the permittee shall demonstrate compliance with the lb PE/mmBtu limitation above pursuant to OAC rule 3745-17-03(B)(9).

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

g. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule, when burning natural gas.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[PTI 03-5740 and OAC rule 3745-77-07(C)(1)]

h. Emission Limitation:

Visible emissions shall not exceed 20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27 percent opacity when burning wood.

Applicable Compliance Method:

Compliance shall be demonstrated through the data collected as required in the monitoring and record keeping in d)(1).

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Dc]

(2) The permittee shall comply with the applicable monitoring, record keeping, reporting and testing requirements under 40 CFR, Part 63, Subpart DDDDD, including the following sections:

Testing Requirements	63.7510(a)(1), (a)(3), (a)(4), (b) - (e), 63.7515(a) - (f), (i), 63.7520(a) - (f), and Table 5

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart DDDDD]

g) Miscellaneous Requirements

(1) The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

[40 CFR 60.13, 40 CFR Part 60, Appendix F, and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

[40 CFR Part 60.13, 40 CFR Part 60, Appendix F, and OAC rule 3745-77-07(C)(1)]