



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

10/20/2015

Barry Ison  
Ohio International Lumber, LLC  
423 Hopewell Rd.  
Waverly, OH 45690

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0666015005  
Permit Number: P0118818  
Permit Type: OAC Chapter 3745-31 Modification  
County: Pike

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

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

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

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

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

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

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

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

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Ohio International Lumber, LLC**

Facility ID:	0666015005
Permit Number:	P0118818
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/20/2015
Effective:	10/20/2015
Expiration:	10/20/2025





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Ohio International Lumber, LLC

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**Final Permit-to-Install and Operate**  
Ohio International Lumber, LLC  
**Permit Number:** P0118818  
**Facility ID:** 0666015005  
**Effective Date:** 10/20/2015

## Authorization

Facility ID: 0666015005  
Application Number(s): A0052003  
Permit Number: P0118818  
Permit Description: Chapter 31 modification permit for conversion of a natural gas-fired boiler to dual fuel (natural gas/wood waste)-fired boiler.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$400.00  
Issue Date: 10/20/2015  
Effective Date: 10/20/2015  
Expiration Date: 10/20/2025  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Ohio International Lumber, LLC  
423 Hopewell Rd.  
Waverly, OH 45690

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**  
Ohio International Lumber, LLC  
**Permit Number:** P0118818  
**Facility ID:** 0666015005  
**Effective Date:** 10/20/2015

## Authorization (continued)

Permit Number: P0118818

Permit Description: Chapter 31 modification permit for conversion of a natural gas-fired boiler to dual fuel (natural gas/wood waste)-fired boiler.

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

<b>Emissions Unit ID:</b>	<b>B001</b>
Company Equipment ID:	Boiler #2 - 25.2 MMBtu/hr, nat. gas-fired.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Ohio International Lumber, LLC  
**Permit Number:** P0118818  
**Facility ID:** 0666015005  
**Effective Date:** 10/20/2015

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

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

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

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

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

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

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

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
Ohio International Lumber, LLC  
**Permit Number:** P0118818  
**Facility ID:** 0666015005  
**Effective Date:** 10/20/2015

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) 3.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source, 40 CFR Part 63, Subpart JJJJJJ. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html> .
3. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), for this project were not necessary because for the emissions units not exempted from modeling per OEPA Engineering Guide #69, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
4. The following emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart Db: B001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



**Final Permit-to-Install and Operate**  
Ohio International Lumber, LLC  
**Permit Number:** P0118818  
**Facility ID:** 0666015005  
**Effective Date:** 10/20/2015

## **C. Emissions Unit Terms and Conditions**

**1. B001, Boiler #2 - 25.2 MMBtu/hr**

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

25.2 MMBtu/hr dual natural gas/wood-fired boiler controlled by a multicyclone.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>For wood combustion only:</u></p> <p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 12.35 lbs/hr and 54.1 tons per year (tpy).</p> <p>Carbon monoxide (CO) emissions shall not exceed 15.12 lbs/hr and 66.23 tpy.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.63 lbs/hr and 2.76 tpy.</p> <p>Particulate matter less than 2.5 microns (PM<sub>2.5</sub>) emissions shall not exceed 4.06 lbs/hr and 17.79 tpy.</p> <p>Particulate matter less than 10 microns (PM<sub>10</sub>) emissions shall not exceed 6.8 lbs/hr and 29.8 tpy.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>For natural gas only:</u></p> <p>NO<sub>x</sub> shall not exceed 2.45 lbs/hr and 10.57 tpy.</p> <p>CO emissions shall not exceed 2.06 lbs/hr and 9.01 tpy.</p> <p>SO<sub>2</sub> emissions shall not exceed 0.02 lb/hr and 0.06 tpy.</p> <p>Particulate matter less than 2.5 microns (PM2.5) emissions shall not exceed 4.06 lbs/hr and 17.79 tpy.</p> <p>Particulate matter less than 10 microns (PM10) emissions shall not exceed 6.8 lbs/hr and 29.8 tpy.</p>
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	This limit is less stringent than the limit listed under OAC rule 3745-31-05.
d.	OAC rule 3745-17-10(C)(2)	This limit is less stringent than the limit listed under OAC rule 3745-31-05.
e.	OAC rule 3745-18-72(A)	This limit is less stringent than the limit established under OAC rule 3745-31-05.
f.	<p>40 CFR Part 60, Subpart Db (40 CFR 60.40b-60.49b)</p> <p>[In accordance with 40 CFR 63.7690(a), this emission unit is a small industrial-commercial-institutional steam generating unit subject to the emissions limitations/control measures specified in this section.]</p>	<p>Subject but exempt from emissions limitations since boiler is less than 100 MMBtu/hr.</p> <p>[40 CFR 60.43b(a)]</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The permittee shall operate the multicyclone at all times the wood fueled portion of the boiler is being used.
- (2) The permittee shall manage the wood waste using good housekeeping procedures in order to minimize emissions from the boiler.
- (3) The permittee shall only use wood waste that has been generated in their process or similar process this includes non-treated wood; wood that has been pressure-treated, painted, or similarly processed in a way that would create more emissions shall not be burned in this unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of amount of wood waste combusted in the unit.
- (2) The permittee shall document anytime fuel other than natural gas or wood waste is being used in this emission unit.
- (3) The permittee shall perform daily checks while the wood waste is being used in the unit, 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 location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, operating manuals for the boiler and multicyclone, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the multicyclone to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the multicyclone while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of multicyclone and shall maintain the following information:
  - a. The date of the inspection;
  - b. A description of each/any problem identified and the date it was corrected;
  - c. A description of any maintenance and repairs performed; and
  - d. The name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (8) The permittee shall maintain records that document any time periods when the multicyclone was not in service when the emissions unit(s) was/were in operation, as well as a record of all operations during which the engine was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal: or they may be mailed as a hard copy to the appropriate district office or local air agency.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d(3) above:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specific in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:

For wood combustion, NO<sub>x</sub> emissions shall not exceed 12.35 lbs/hr and 54.1 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation was established based on the emission factors for waste residue combustion in boilers (AP-42 section 1.6, (9/03) and data provided in permittee's application.

$$(25.2 \text{ MMBtu/hr})(0.49 \text{ lb NO}_x/\text{MMBtu}) = 12.35 \text{ lbs/hr}$$
$$(25.2 \text{ MMBtu/hr})(0.49 \text{ lb NO}_x/\text{MMBtu}) (8760 \text{ hr/yr})/(\text{ton}/2,000 \text{ lb})= 54.1 \text{ tpy}$$

Ongoing compliance with the lb/hr limit shall be determined by the testing required by f)(2).
  - b. Emission Limitations:

For wood combustion, CO emissions shall not exceed 15.12 lbs/hr and 66.23 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation was established based on the emission factors for waste residue combustion in boilers (AP-42 section 1.6, (9/03) and data provided in permittee's application.



$$(25.2 \text{ MMBtu/hr})(0.6 \text{ lb CO/MMBtu}) = 15.12 \text{ lbs/hr}$$

$$(25.2 \text{ MMBtu/hr})(0.6 \text{ lb CO/MMBtu}) (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 66.23 \text{ tpy}$$

Ongoing compliance with the lb/hr limit shall be determined by the testing required by f)(2).

c. Emission Limitations:

For wood combustion, SO<sub>2</sub> emissions shall not exceed 0.63 lbs/hr and 2.76 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation was established based on the emission factors for waste residue combustion in boilers (AP-42 section 1.6, (9/03) and data provided in permittee's application (25.2 MMBtu/hr)(0.025 lb CO/MMBtu) = 0.63 lbs/hr

$$(25.2 \text{ MMBtu/hr})(0.025 \text{ lb CO/MMBtu}) (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 2.76 \text{ tpy}$$

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

d. Emission Limitations:

For wood combustion, PM<sub>2.5</sub> emissions shall not exceed 4.06 lbs/hr and 17.79 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation shall be based on the emission factors for waste residue combustion in boilers (AP-42 section 1.6, (9/03) and data provided in permittee's application.

$$(25.2 \text{ MMBtu/hr})(0.16 \text{ lb CO/MMBtu}) = 4.0 \text{ lbs/hr}$$

$$(25.2 \text{ MMBtu/hr})(0.16 \text{ lb CO/MMBtu}) (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 17.7 \text{ tpy}$$

If required, PM<sub>2.5</sub> emissions shall be determined according to test Methods 201/201A, and 202 as set forth in 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



e. Emission Limitations:

For wood combustion, PM10 emissions shall not exceed 6.8 lbs/hr and 29.8 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation shall be based on the emission factors for waste residue combustion in boilers (AP-42 section 1.6, (9/03) and data provided in permittee's application  
 $(25.2 \text{ MMBtu/hr})(0.27 \text{ lb CO/MMBtu}) = 6.8 \text{ lbs/hr}$

$(25.2 \text{ MMBtu/hr})(0.27 \text{ lb CO/MMBtu}) (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 29.8 \text{ tpy}$

Ongoing compliance with the lb/hr limit shall be determined by the testing required by f)(2).

f. Emission Limitations:

For natural gas combustion, NO<sub>x</sub> shall not exceed 2.45 lbs/hr and 10.57 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation shall be based on the emission factors for natural gas combustion (AP-42 section 1.4, (9/03) and data provided in permittee's application.

$(25,200,000 \text{ Btu/hr}) / (1028 \text{ Btu/scf}) * (100 \text{ lb NO}_x/\text{MMscf}) / (1,000,000 \text{ MM}) = 2.45 \text{ lbs/hr}$

$2.45 \text{ lbs/hr} * (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 10.57 \text{ tpy}$

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emission Limitations:

For natural gas combustion, CO emissions shall not exceed 2.06 lbs/hr and 9.01 tpy.

Applicable Compliance Method:

Compliance with the short term and annual limitation shall be based on the emission factors for natural gas combustion (AP-42 section 1.4, (9/03) and data provided in permittee's application.

$(25,200,000 \text{ Btu/hr}) / (1028 \text{ Btu/scf}) * (84 \text{ lb CO/MMscf}) / (1,000,000 \text{ MM}) = 2.06 \text{ lbs/hr}$



$$2.06 \text{ lbs/hr} * (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 9.01 \text{ tpy}$$

Compliance with the short term and annual limitation shall be based on the emission factors for natural gas combustion (AP-42 section 1.4, (9/03) and data provided in permittee's application.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

**h. Emission Limitations:**

For natural gas combustion, SO<sub>2</sub> emissions shall not exceed 0.02 lb/hr and 0.06 tpy.

**Applicable Compliance Method:**

Compliance with the short term and annual limitation shall be based on the emission factors for natural gas combustion (AP-42 section 1.4, (9/03) and data provided in permittee's application.

$$(25,200,000 \text{ Btu/hr}) / (1028 \text{ Btu/scf}) * (0.6 \text{ lb SO}_2/\text{MMscf}) / (1,000,000 \text{ MM}) = 0.02 \text{ lbs/hr}$$

$$0.02 \text{ lbs/hr} * (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 0.06 \text{ tpy}$$

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

**i. Emission Limitations:**

For natural gas combustion, PE shall not exceed 0.19 lb/hr and 0.82 tpy.

**Applicable Compliance Method:**

Compliance with the short term and annual limitation shall be based on the emission factors for natural gas combustion (AP-42 section 1.4, (9/03) and data provided in permittee's application.

$$(25,200,000 \text{ Btu/hr}) / (1028 \text{ Btu/scf}) * (7.6 \text{ lb PE/MMscf}) / (1,000,000 \text{ MM}) = 0.19 \text{ lbs/hr}$$

$$0.19 \text{ lbs/hr} * (8760 \text{ hr/yr}) / (\text{ton}/2,000 \text{ lb}) = 0.82 \text{ tpy}$$



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

j. Emission Limitations:

Visible PE from any stack shall not exceed twenty-percent opacity as a six minute average, except as provided by rule.

Applicable Compliance Method:

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

(2) 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 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub>, CO, and PM<sub>10</sub> in the appropriate averaging periods.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

PM <sub>10</sub>	Method 201, 2014A, 202	40 CFR Part 60, Appendix M
NO <sub>x</sub>	Method 7, 7A, 7B, 7C, 7D, 7E, 20	40 CFR Part 60, Appendix A
CO	Method 10, 10A, 10B	40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.



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

Ohio International Lumber, LLC

**Permit Number:** P0118818

**Facility ID:** 0666015005

**Effective Date:** 10/20/2015

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) None.