



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

11/23/2015

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Sauder Woodworking
Facility ID: 0326000203
Permit Type: Minor Permit Modification
Permit Number: P0119321

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Ohio EPA DAPC, Northwest District Office



PROPOSED

Division of Air Pollution Control Title V Permit for Sauder Woodworking

Facility ID:	0326000203
Permit Number:	P0119321
Permit Type:	Minor Permit Modification
Issued:	11/23/2015
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

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	22
1. P100, BAGHOUSE ME # 288 SWC	23
2. P201, BAGHOUSE ME # 619 SWC	28
3. P203, BAGHOUSE ME # 1130 SWC	32
4. P207, BAGHOUSE ME # 5062-A SWC.....	36
5. P318, BAGHOUSE ME # 1048	40
6. P512, LAMINATOR.....	44
7. P519, BURKLE LAMINATOR SWC	47
8. P524, COLD PRESS & LEATHER LAMINATION	50
9. P531, ME 5984 Elm St.....	53
10. P801, INKERS	58
11. P802, HANDWIPING OPERATIONS	61
12. R201, MAINTENANCE PAINT BOOTH SWC	64
13. R301, POST FINISHING LINE	69
14. K001, Fritz Coater.....	76
15. P337, ME 6953 & ME6939.....	79
16. P338, 360 Wrapper	81
17. P339, Drawer Wrapper	83
18. Emissions Unit Group -Group A - pneumatic wood waste collectors - 72,000 ACFM: P303, P304,P305,P306,P307,P308,P309,P313,P314,P401,P402,P403,P404,P406,P504,P507,P508	85
19. Emissions Unit Group -Group B - pneumatic wood waste collectors - 72,000 ACFM: P302, P311, P312, P505, P506.....	90
20. Emissions Unit Group -Group C - pneumatic wood waste collectors - 72,000 ACFM: P407, P509, P510, P511	95
21. Emissions Unit Group -Group D - pneumatic wood waste collectors - 50,000 ACFM: P400, P405, P503	
100	
22. Emissions Unit Group -Group E - pneumatic wood waste collectors - 50,000 ACFM: P310, P500, P501, P502.....	105
23. Emissions Unit Group -Group F - pneumatic wood waste collectors 20,280 ACFM: P200, P202	110



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0326000203
Facility Description: Wood Household Furniture
Application Number(s): A0053915
Permit Number: P0119321
Permit Description: Title V minor permit modification to incorporate the terms of new PTIs.
Permit Type: Minor Permit Modification
Issue Date: 11/23/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0116630

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

Sauder Woodworking
502 Middle Street
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



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203
Effective Date: To be entered upon final issuance

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 recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

- c) The permittee shall submit required reports in the following manner:
- (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 submitted scheduled 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 permit except 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

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (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 intermittent consistent 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 the Ohio 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 Requirements Under 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.



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

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 of an 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.



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203
Effective Date: To be entered upon final issuance

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 rule is applicable to this facility: 40 CFR 63.800 et seq. (Subpart JJ)
3. The following is the list of the emissions units /operations at this facility that are subject to 40 CFR 63.800 et seq. (Subpart JJ):
 - a) significant emissions units K001, P319, P337, P338, P339, P512, P519, P524, P801, P802, R301;
 - b) insignificant emissions unit P340;
 - c) all other “finishing operations” as set forth in 40 CFR 63.801, 63.802(a)(1), and 63.802(b)(1); “foam adhesive” operations as set forth in 40 CFR 63.801 and 63.803(a)(2)(i); “contact adhesive” operations as set forth in 40 CFR 63.801, 63.802(a)(2)(ii), and 63.802(b)(2); and “strippable spray booth material/ coating” operations as set forth in 40 CFR 63.801, 63.802(a)(3), and 63.802(b)(3); and
 - d) all associated operations (e.g. cleaning, storage operations) as set forth in 40 CFR 63.803.
4. The permittee shall comply with the applicable emissions standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.802(a)	Emissions limitations for existing affected sources
63.802(c)	Operational and maintenance (general)

5. The permittee shall comply with the applicable work practice standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.803(a)	Work implementation plan
63.803(b)	Operator training course*
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and wash-off solvent accounting system
63.803(e)	Chemical composition of cleaning and wash-off solvents
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning



63.803(k)	Wash-off operations
63.803(l)	Formulation assessment plan for finishing operations

* The permittee shall ensure that all personnel /positions associated with the coating operations utilizing HAP-containing materials receive training in the applicable 'work practice' standards required under 40 CFR 63 Subpart JJ (MACT Standards for Wood Furniture Manufacturing).

6. The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)

7. The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)



Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 [OAC 3745-77-07(C)(1)]

8. The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJ, including the following sections:

63.804(d)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(d)(1) through (d)(4)
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP (or formaldehyde specifically) content of the liquid coating

9. The emissions unit(s) contained in B.3 are subject to 40 CFR, Part 63, Subpart JJ. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

10. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, and well as any emission 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, 3745-31, and/or 40 CFR Part 63, Subpart JJ.

EU ID	Operations, Property and/or Equipment Description
B201	ME RFM-01 AIR MAKE-UP LINCOLN STREET ENG/MAINT. -7.98 mmBtu/hr n.g.
B202	ME RFG-01 AIR MAKE-UP SAUDER TECHNICAL CENTER -5.78 mmBtu/hr n.g.
B303	ES RFS-15 AIR MAKE-UP SAUDER STREET -7.98 mmBtu/hr n.g.
B304	ES RFS-01 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B305	ES RFS-02 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B306	ES RFS-03 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B307	ES RFS-04 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B308	ES RFS-05 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B309	ES RFS-06 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B310	ES RFS-07 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B311	ES RFS-08 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B312	ES RFS-09 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B313	ES RFS-10 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B314	ES RFS-11 AIR MAKE-UP SAUDER STREET -5.0 mmBtu/hr n.g.
B315	ES RFW-01 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B316	ES RFW-02 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B317	ES RFW-03 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.



Proposed Title V Permit
 Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

B318	ES RFW-04 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B319	ES RFW-05 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B320	ES RFW-06 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B323	ES RFS-13 AIR MAKE-UP SAUDER STREET -9.63 mmBtu/hr n.g.
B324	ES RFS-14 AIR MAKE-UP SAUDER STREET -9.63 mmBtu/hr n.g.
B327	LR RFW-07 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B328	LR RFW-08 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B329	LR RFW-09 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B330	LR RFW-10 AIR MAKE-UP LUTZ ROAD -9.63 mmBtu/hr n.g.
B401	BC RFJ-01 AIR MAKE-UP ELM STREET -9.63 mmBtu/hr n.g.
B402	BC RFJ-03 AIR MAKE-UP BRUSH CREEK -9.63 mmBtu/hr n.g.
B403	BC RFJ-05 AIR MAKE-UP BRUSH CREEK -9.63 mmBtu/hr n.g.
B502	BR RFF-01 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B503	BR RFF-02 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B504	BR RFF-03 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B505	BR RFF-04 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B506	BR RFF-05 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B507	BR RFF-06 AIR MAKE-UP BARRE ROAD -5.78 mmBtu/hr n.g.
B508	BR RFO-01 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B509	BR RFO-02 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B510	BR RFO-03 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B511	BR RFO-04 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B512	BR RFO-05 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B513	BR RFO-06 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B514	BR RFO-07 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
B515	BR RFO-08 AIR MAKE-UP SDC -5.78 mmBtu/hr n.g.
P104	INCIDENTAL GLUING PRODUCT DESIGN CENTER
P209	R&D SMALL LAB SPRAY BOOTH SAUDER TECHNICAL CENTER
P215	5 HP CIRCULATION PUMP
P332	Small Hand Spray Booth (sampling) at Eversheen Line
P336	Small baghouse connected to the Casket Factory <4000 ACFM -vents inside
P214	COMPUTER POWER SOURCE EMERGENCY GENERATOR (PBR09337)
P534	CROSS CUT SAW WITH DUST COLLECTOR BARRE RD
P532	Sand/Relaminate Line

[OAC rule 3745-77-07(A)(13)]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P100, BAGHOUSE ME # 288 SWC

Operations, Property and/or Equipment Description:

pneumatic wood waste collection /handling system - 30,160 ACFM (288 SWC)

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 03-13447 issued November 5, 2002)	1.09 lbs particulate emissions (PE) /hr; 4.75 tons PE /yr (for each emissions unit) 0.78 lbs particulate emissions less than 10 microns (PM ₁₀) /hr; 3.42 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.ii.] See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

- i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains particulate emissions (PE) /dscf and 0.0030 grains particulate matter 10 microns or less in size (PM₁₀) /dscf;
- ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.



- b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13508]
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13508]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- f) Testing Requirements
- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be

amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.

- b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
1.09 lbs PE /hr; 4.75 tons PE /yr
0.78 lbs PM₁₀ /hr; 3.42 tons PM₁₀ /yr

Applicable Compliance Method:

The hourly PE limitation was established by applying the emission limitation of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 30,160 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0042 gr PE /dscf, compliance with the hourly limitation shall also be demonstrated.

The hourly PM₁₀ limitation was established by applying the emission limitation of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 20,280 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf, compliance with the hourly limitation shall also be demonstrated.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13508]

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI 03-13508]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.

2. P201, BAGHOUSE ME # 619 SWC

Operations, Property and/or Equipment Description:

pneumatic wood waste collection /handling system - 24,128 ACFM (619 SWC)

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 03-13447 issued November 5, 2002)	0.87 lb particulate emissions (PE) /hr; 3.80 tons PE /yr 0.62 lb particulate matter 10 microns or less in size (PM ₁₀) /hr; 2.72 tons PM ₁₀ /yr opacity restrictions [See b)(2)a.ii.] See b)(2)b.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

- i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf; and
- ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions.
 - b. the total duration of any visible emissions incident.
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
- e) Reporting Requirements
 - (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with

maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A

PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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



(2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
0.87 lb PE /hr; 3.80 tons PE /yr
0.62 lb PM₁₀ /hr; 2.72 tons PM₁₀ /yr

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf by the maximum volumetric air flow rate of 24,128 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf by the total maximum volumetric air flow rate of 24,128 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.



3. P203, BAGHOUSE ME # 1130 SWC

Operations, Property and/or Equipment Description:

pneumatic wood waste collection /handling system - 12,000 ACFM (1130 SWC)

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 03-13447 issued November 5, 2002)	0.43 lb particulate emissions (PE) /hr; 1.89 tons PE /yr 0.31 lb particulate matter 10 microns or less in size (PM ₁₀) /hr; 1.36 tons PM ₁₀ /yr opacity restrictions [See b)(2)a.ii.]
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

- i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf; and
- ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with

maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A

PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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



(2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
0.43 lb PE /hr; 1.89 ton PE /yr
0.31 lb PM₁₀ /hr; 1.36 ton PM₁₀ /yr

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf by the total maximum volumetric air flow rate of 12,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf by the total maximum volumetric air flow rate of 12,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.

4. P207, BAGHOUSE ME # 5062-A SWC

Operations, Property and/or Equipment Description:

4000 CFM Wood Waste Storage Silo System (ME 5062-A)

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 03-13489 issued November 1, 2001)	0.14 lb particulate emissions (PE) /hr; 0.61 ton PE /yr 0.10 lb particulate matter 10 microns or less in size (PM ₁₀) /hr; 0.44 ton PM ₁₀ /yr opacity restrictions [See b)(2)a.ii.]
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf; and

ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13489]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13489]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with

maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A

PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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



(2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
0.14 lb PE /hr; 0.61 ton PE /yr
0.10 lb PM₁₀ /hr; 0.44 ton PM₁₀ /yr

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf by the total maximum volumetric air flow rate of 4000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf by the total maximum volumetric air flow rate of 4000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
- ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI 03-13489]

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A. [OAC 3745-77-07(C)(1) and PTI 03-13489]

g) Miscellaneous Requirements

- (1) None.

5. P318, BAGHOUSE ME # 1048

Operations, Property and/or Equipment Description:

pneumatic wood waste collection /handling system - 3744 ACFM -Plant Area E (1048 SWC)

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 03-13447 issued November 5, 2002)	0.14 lb particulate emissions (PE) /hr; 0.61 ton PE /yr 0.096 lb particulate matter 10 microns or less in size (PM ₁₀) /hr; 0.42 ton PM ₁₀ /yr opacity restrictions [See b)(2)a.ii.]
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf; and

ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

- c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with

maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A

PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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



(2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
0.14 lbs PE /hr; 0.61 tons PE /yr
0096 lbs PM₁₀ /hr; 0.42 tons PM₁₀ /yr

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf by the total maximum volumetric air flow rate of 3744 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf by the total maximum volumetric air flow rate of 3744 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by the maximum operating schedule of 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated. [OAC 3745-77-07(C)(1) and PTI 03-13447]

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A. [OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.



6. P512, LAMINATOR

Operations, Property and/or Equipment Description:

laminator number 2 ('Hymmen')

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 03-13201 issued June 27, 2002)	0.36 lb organic compounds (OC) /hr, 1.6 tons OC /yr See b)(2)a.
b.	40 CFR 63.800 et seq. (MACT Subpart JJ)	See b)(2)b. and b)(2)c.

(2) Additional Terms and Conditions

a. The hourly OC emission limitation for adhesives represents the potential to emit of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

b. This emissions unit does not employ a 'coating' or 'contact adhesive' as defined in 40 CFR 63.801. Therefore, this emissions unit is not subject to any of the emissions standards of Subpart JJ under 40 CFR 63.802.

c. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each resin employed;
 - b. the OC content of each resin employed in pounds per gallon (or weight percentage);
 - c. the number of gallons (or pounds) of each resin employed;
 - d. the OC emission rate* for each resin [d)(1)b. x d)(1)c.], in pounds;
 - e. the total OC emission rate for all resins [summation of d)(1)d.], in pounds or tons; and
 - f. the annual, year to date OC emissions from all resins employed [summation of d)(1)e. for each calendar month to date from January to December].

* It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process. Therefore, the emissions rate for each resin is equal to the number of gallons multiplied by the OC content (by volume), then multiplied by an emission factor of 0.1. For usage of resin with documentation of formaldehyde consumption greater than 90%, a corresponding emissions factor of less than 0.1 may be used in the calculation.

[OAC 3745-77-07(C)(1) and PTI 03-13201]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-13201]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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. Emission Limitation:
0.36 lb OC /hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum resin usage rate of 59.5 gallons per hour and a maximum OC content of 0.06 lb/gal and an emission factor of 0.1. [OAC 3745-77-07(C)(1) and PTI 03-13201]

- b. Emission Limitation:
1.6 ton OC /yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)f. [OAC 3745-77-07(C)(1) and PTI 03-13201]

- (2) US EPA Method 24 or formulation data shall be used to determine the OC contents of the adhesives /cleanup materials. [OAC 3745-77-07(C)(1) and PTI 03-13201]

g) Miscellaneous Requirements

- (1) None.

7. P519, BURKLE LAMINATOR SWC

Operations, Property and/or Equipment Description:

Laminator

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 03-17085 issued April 10, 2007)	1.93 lbs organic compounds (OC) /hr, 8.5 tons OC /yr See b)(2)a.
b.	40 CFR 63.800 et seq. (MACT Subpart JJ)	See b)(2)b. and b)(2)c.

(2) Additional Terms and Conditions

a. The hourly OC emission limitation for adhesives represents the potential to emit of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

b. This emissions unit does not employ a 'coating' or 'contact adhesive' as defined in 40 CFR 63.801. Therefore, this emissions unit is not subject to any of the emissions standards of Subpart JJ under 40 CFR 63.802.

c. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each resin employed;
 - b. the OC content of each resin employed in pounds per gallon (or weight percentage);
 - c. the number of gallons (or pounds) of each resin employed;
 - d. the OC emission rate* for each resin [d)(1)b. x d)(1)c.], in pounds;
 - e. the total OC emission rate for all resins [summation of d)(1)d.], in pounds or tons; and
 - f. the annual, year to date OC emissions from all resins employed [summation of d)(1)e. for each calendar month to date from January to December].

* It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process. Therefore, the emissions rate for each resin is equal to the number of gallons multiplied by the OC content (by volume), then multiplied by an emission factor of 0.1. For usage of resin with documentation of formaldehyde consumption greater than 90%, a corresponding emissions factor of less than 0.1 may be used in the calculation.

[OAC 3745-77-07(C)(1) and PTI 03-13201]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-13201]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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:



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

- a. Emission Limitation:
1.93 lbs OC /hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a maximum resin usage rate of 69 gallons per hour and a maximum OC emissions of 0.028 lb/gal (supplier test results - taking into account OC retention factor).

[OAC 3745-77-07(C)(1) and PTI 03-13201]

- b. Emission Limitation:
8.5 ton OC /yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)f.

[OAC 3745-77-07(C)(1) and PTI 03-13201]

- (2) US EPA Method 24 or formulation data shall be used to determine the OC contents of the adhesives /cleanup materials.

[OAC 3745-77-07(C)(1) and PTI 03-13201]

- g) Miscellaneous Requirements

- (1) None.

8. P524, COLD PRESS & LEATHER LAMINATION

Operations, Property and/or Equipment Description:

Cold Press and Leather lamination

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 03-17064 issued April 10, 2007)	2.66 lbs organic compounds (OC) /hr, 11.7 tons OC /yr See b)(2)a.
b.	40 CFR 63.800 et seq. (MACT Subpart JJ)	See b)(2)b. and b)(2)c.

(2) Additional Terms and Conditions

a. The hourly OC emission limitation for adhesives represents the potential to emit of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

b. This emissions unit does not employ a 'coating' or 'contact adhesive' as defined in 40 CFR 63.801. Therefore, this emissions unit is not subject to any of the emissions standards of Subpart JJ under 40 CFR 63.802.

c. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all adhesives employed in this emissions unit:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon (or weight percentage);
 - c. the number of gallons (or pounds) of each adhesive employed;
 - d. the OC emission rate for each adhesive [d)(1)b. x d)(1)c.], in pounds;
 - e. the total OC emission rate for all adhesives [summation of d)(1)d.], in pounds or tons; and
 - f. the annual, year to date OC emissions from all adhesives employed [summation of d)(1)e. for each calendar month to date from January to December].
[OAC 3745-77-07(C)(1) and PTI 03-17064]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-17064]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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. Emission Limitation:
2.66 lbs OC /hr

Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

*The potential to emit is based on a maximum resin usage rate of 8.75 gallons per hour and a maximum OC content of 0.305 lb/gal.
[OAC 3745-77-07(C)(1) and PTI 03-17064]

b. Emission Limitation:
11.7 ton OC /yr

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(1)f.
[OAC 3745-77-07(C)(1) and PTI 03-17064]

(2) US EPA Method 24 or formulation data shall be used to determine the OC contents of the adhesives /cleanup materials.
[OAC 3745-77-07(C)(1) and PTI 03-17064]

g) Miscellaneous Requirements

(1) None.



9. P531, ME 5984 Elm St

Operations, Property and/or Equipment Description:

pneumatic wood waste collection /handling system - 5880 ACFM -Elm St. (5984 SWC)

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(F) (PTI P0109107 issued December 6, 2011)	0.32 pound PE /hour, and 1.39 tons PE /year 0.23 pound particulate matter 10 microns or less in size (PM ₁₀) /hour and 0.99 tons PM ₁₀ /year Visible particulate emissions (PE) shall not exceed 5% opacity, as a six minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/2006	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)e.

(2) Additional Terms and Conditions

a. PTI P0109107 established the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1):

i. 0.32 pound PE /hour, and 1.39 tons PE /year.

- ii. 0.23 pound PM₁₀/hour and 0.99 tons PM₁₀/year.
- iii. Visible PE from any stack serving this emissions unit shall not exceed 5% opacity, as a six minute average.

All emissions of particulate matter from the collector are PM₁₀.

- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)a.].

It should be noted that the voluntary restrictions were established with the intentional purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should also be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the PM₁₀ emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration the practically and legally enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

BAT (under Senate Bill 265 changes) is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. PE (also referred to as total suspended particulate or particulate matter), is an air contaminant that does not involve an established NAAQS. PE limitations are established for this permit for Prevention of Significant Deterioration (PSD) purposes at this facility.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].
 - e. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to the voluntary restrictions and BAT requirements established in this permit [see b)(2)b.].
- c) **Operational Restrictions**
- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]:
 - a. This pneumatic wood waste collection /handling system shall be capable of achieving a maximum outlet concentration of 0.0045 gr/dscf for PM₁₀.

[OAC 3745-77-07(A)(1) and PTI P0109107]
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI P0109107]
- e) **Reporting Requirements**
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI P0109107]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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. Emission Limitation:
0.0045 gr PM₁₀/dscf

Applicable Compliance Method:

The emission limitation was established in accordance with the collector manufacturer's guaranteed maximum outlet concentration. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC 3745-77-07(C)(1) and PTI P0109107]

b. Emission Limitation:
0.32 pound PE /hour
0.23 pound PM₁₀/hour

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the maximum outlet grain loading concentration of 0.0063 gr PE/dscf and the maximum volumetric air flow rate (5880 acfm) from this emissions unit to the fabric filter, and using the following conversion factors in order to convert to pounds per hour: 1 pound/7000 grains and 60 minutes/hour.

The hourly emission limitation was developed by multiplying the maximum fabric filter outlet concentration of 0.0045 gr PM₁₀/dscf by the maximum volumetric air flow rate (5880 acfm) from this emissions unit to the fabric filter, and using the conversion factors of 7000 grains /lb and 60 minutes/hour.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC 3745-77-07(C)(1) and PTI P0109107]

c. Emission Limitation:
1.39 tons PE /year
0.99 tons PM₁₀/year



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The annual limitations were established by multiplying the hourly limitation by the maximum operating schedule of 8,760 hours/year, and then dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI P0109107]

d. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI P0109107]

g) Miscellaneous Requirements

(1) None.



10. P801, INKERS

Operations, Property and/or Equipment Description:

453 inkers ('edge' roll coaters - ink/stain application)

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 03-13380 issued June 27, 2002)	6.80 lbs organic compounds (OC) /hr; 29.9 tons OC /yr See b)(2)b.
b.	40 CFR, Part 63.800 et seq. (MACT Subpart JJ) [In accordance with 40 CFR 63.2, this emission unit is a "finishing operation" at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40 CFR 63, Subpart JJ:</u> 1.0 lb volatile hazardous air pollutant (VHAP) /lb solids, as applied, for inks/stains 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803] See b)(2)a.
c.	40 CFR 63.1-15	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).



- b. The hourly OC emission limitation for inks represents the potential to emit of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each month for all inks/stains employed in this emissions unit:
 - a. the name and identification number of each ink/stain employed;
 - b. the OC content of each ink/stain, as applied, in pounds per gallon (or weight percentage);
 - c. the number of gallons (or pounds) of each ink/stain employed;
 - d. the OC emission rate for each ink/stain [d)(1)b. x d)(1)c.], in pounds;
 - e. the total OC emission rate for all inks/stains [summation of d)(1)d.], in pounds or tons; and
 - f. the annual, year to date OC emissions from all inks/stains employed [summation of d)(1)e. for each calendar month to date from January to December].
[OAC 3745-77-07(C)(1) and PTI 03-13380]
- e) Reporting Requirements
 - (1) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-13380]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- 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. Emission Limitation:
6.80 lbs OC /hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a total actual VOC emissions amount attributed to the inkers for 1999 (29,000 pounds) and dividing by the number of inkers employed in 1999 (286), then dividing by the actual hours of operation for 1999 (6762 hours), then multiplying by a maximum of 453 inkers.
[OAC 3745-77-07(C)(1) and PTI 03-13380]

- b. Emission Limitation:
29.9 tons OC /yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)f.
[OAC 3745-77-07(C)(1) and PTI 03-13380]

- c. Emission Limitation:

1.0 lb VHAP /lb solids, as applied, for inks/stains; and 10% VHAP, by weight, for thinners.

Applicable Compliance Method:

The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ compliance provisions for this emissions unit (see Sections B.2 through B.8).

[OAC 3745-77-07(C)(1) and PTI 03-13380]

- (2) US EPA Method 24 or formulation data shall be used to determine the OC contents of the adhesives /cleanup materials.
[OAC 3745-77-07(C)(1) and PTI 03-13380]

- g) Miscellaneous Requirements

- (1) None.

11. P802, HANDWIPING OPERATIONS

Operations, Property and/or Equipment Description:

Facility-Wide Stain Application - Small Operations

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 03-13519 issued October 15, 2002)	15.4 tons organic compounds (OC) /yr
b.	40 CFR, Part 63.800 et seq. (MACT Subpart JJ) [In accordance with 40 CFR 63.2, this emission unit is a "finishing operation" at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40 CFR 63, Subpart JJ:</u> 1.0 lb volatile hazardous air pollutant (VHAP) /lb solids, as applied, for stains 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803] See b)(2)a.
c.	40 CFR 63.1-15	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all stains employed in this emissions unit:
 - a. the name and identification number of each stain employed;
 - b. the OC content of each stain, as applied, in pounds per gallon (or weight percentage);
 - c. the number of gallons (or pounds) of each stain employed;
 - d. the OC emission rate for each stain [d)(1)b. x d)(1)c.], in pounds.
 - e. the total OC emission rate for all stains [summation of d)(1)d.], in pounds or tons; and
 - f. the annual, year to date OC emissions from all stains employed [summation of d)(1)e. for each calendar month to date from January to December].
[OAC 3745-77-07(C)(1) and PTI 03-13519]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that specify the total VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-13519]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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. Emission Limitation:
15.4 ton OC /yr

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(1)f.
[OAC 3745-77-07(C)(1) and PTI 03-13519]
 - b. Emission Limitation:
1.0 lb VHAP /lb solids, as applied, for stains; and 10% VHAP, by weight, for thinners.



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ compliance provisions for this emissions unit (see Sections B.2 through B.8).

[OAC 3745-77-07(C)(1) and PTI 03-13519]

- (2) US EPA Method 24 or formulation data shall be used to determine the OC contents of the adhesives /cleanup materials.
[OAC 3745-77-07(C)(1) and PTI 03-13519]

g) Miscellaneous Requirements

- (1) None.



12. R201, MAINTENANCE PAINT BOOTH SWC

Operations, Property and/or Equipment Description:

Maintenance Paint Booth.

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 03-13509 issued October 22, 2002)	<u>coating operations:</u> 93.6 lbs organic compounds (OC) /day; 17.1 tons OC /yr <u>clean-up operations:</u> 147 lb OC /month; 0.88 tons OC /yr 2.15 pound particulate emissions (PE)/hour and 9.4 tons PE/year Visible PE shall not exceed 0 percent opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-21-09 (U)(2)(e)(iii)	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The permittee shall not employ more than ten gallons of coating material per day (for the coating of any substrate) in this emissions unit.
- b. The requirements of OAC rule 3745-31-05 also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).
- c. Pursuant to OAC 3745-17-11(C)(3), this emissions unit is exempt from the requirements of OAC rule 3745-17-11.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
[OAC 3745-77-07(A)(1) and PTI 03-13509]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for all coating materials employed in this emissions unit:
 - a. the name and identification number of each coating material employed;
 - b. the volume, in gallons, of each coating material employed;
 - c. the total volume, in gallons, of all coating materials employed;
 - d. the OC content, in pounds per gallon, of each coating material employed;
 - e. the OC emission rate for each coating material [d)(1)b. x d)(1)d.], in pounds; and
 - f. the total OC emission rate for all coating materials [summation of d)(1)e.], in pounds or tons.
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- (2) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total OC emission rate for all coatings employed [summation of d)(1)f.], in pounds or tons; and
 - b. the annual, year to date OC emissions from all coatings employed [summation of d)(2)a. for each calendar month to date from January to December].
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- (3) The permittee shall collect and record the following information each month for all clean-up materials employed in this emissions unit:
 - a. the name and identification number of each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content, in pounds per gallon, of each cleanup material employed;
 - d. the OC emission rate for each cleanup material [d)(3)b. x d)(3)c.], in pounds;
 - e. the total OC emission rate for all cleanup materials [summation of d)(3)d.], in pounds or tons; and

- f. the annual, year to date OC emissions from all cleanup materials employed [summation of d)(3)e. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density
[OAC 3745-77-07(C)(1) and PTI 03-13509]

- (4) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
[OAC 3745-77-07(C)(1) and PTI 03-13509]

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- (2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

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. Emission Limitation:
93.6 lbs OC /day (from coating operations)
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(1).
[OAC 3745-77-07(C)(1) and PTI 03-13509]



- b. Emission Limitation:
17.1 tons OC /yr (from coating operations)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(2).
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- c. Emission Limitation:
147 lbs OC /month (from cleanup operations)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(3).
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- d. Emission Limitation:
0.88 ton OC /yr (from cleanup operations)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(3).
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- e. Emission Limitation:
Coating usage shall not exceed 10 gallons per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in d)(1)c.
[OAC 3745-77-07(C)(1) and PTI 03-13509]
- f. Emission Limitation:
2.15 pounds PE/hour and 9.4 tons PE/year

Applicable Compliance Method:
The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13509]

- (2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the coatings / clean-up materials.
[OAC 3745-77-07(C)(1) and PTI 03-13509]

g) Miscellaneous Requirements

- (1) None.



13. R301, POST FINISHING LINE

Operations, Property and/or Equipment Description:

UV Post Finishing Line (coating formulation, mixing and storage, bottom roll coater, bottom UV cure lamp, part clean off, spray booth with two reciprocating spray gun carriages, top and bottom UV cure lamps)

- 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 03-13730 modified April 5, 2007)	<u>coating operations:</u> 1.97 lbs organic compounds (OC) /hr; 39.4 lbs OC/day; 7.19 tons OC /yr <u>water treatment operations:</u> 302 lbs VOC /month; 1.80 ton VOC /yr <u>clean-up operations:</u> 1.03 tons organic compounds (OC) /month; 12.3 tons OC /yr 0.67 lb particulate emissions (PE) /hr; 2.45 tons PE /yr Visible PE shall not exceed 5% opacity, as a six-minute average. Control requirements [See b)(2)a.]
b.	40 CFR, Part 63.800 et seq. (MACT Subpart JJ) [In accordance with 40 CFR 63.2, this emission unit is a new "finishing operation" at a wood manufacturing operation subject to the emissions limitations and control measures	<u>See Table 3 of 40 CFR 63, Subpart JJ:</u> 0.8 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied, for coatings 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	specified in this section.]	See b)(2)b.
c.	40 CFR 63.1-15	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-17-11(C)	See b)(2)c.

(2) Additional Terms and Conditions

- a. Best available technology (BAT) for this emissions unit has been determined to be use of a control system consisting of a water wash followed by packed-bed scrubber. The control system shall achieve a control efficiency of 99.9% for PE.
- b. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).
- c. Pursuant to OAC 3745-17-11(C)(3), this emissions unit is exempt from the requirements of OAC rule 3745-17-11.
- d. All PE from this emissions unit is assumed to be PM₁₀.
- e. The hourly OC emission limitation represents the potential to emit for the emissions unit (for coatings). Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The maximum operating time for this emissions unit shall not exceed 20 hours per day. [OAC 3745-77-07(A)(1) and PTI 03-13730]
- (2) The permittee shall operate the water wash /scrubber system whenever this emissions unit is in operation. To ensure operation of the water wash and scrubber control system, the permittee shall employ an "electrical interlock system" that allows operation of the emission unit only when the control system is also operating. [OAC 3745-77-07(A)(1) and PTI 03-13730]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain and record each day the following information for this emissions unit:

- a. the number of hours of operation; and
 - b. documentation of all time periods when the electrical interlock system did not operate properly, allowing operation of the emissions unit without water wash and proper scrubber control operation as indicated in c)(2).
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- (3) The permittee shall collect and record the following information each month for coating material and (scrubber) water treatment material usage in this emissions unit:
- a. The company identification for each coating material and water treatment material employed;
 - b. The number of gallons of each coating material and water treatment material employed;
 - c. The VOC content, in pounds per gallon, for each coating and water treatment material employed;
 - d. The volatile organic compound emission rate for each coating and water treatment material employed, in lbs/month [d)(3)b. x d)(3)c.];
 - e. The total volatile organic compound emission rate for all coating material employed [sum of d)(3)d. for coating materials];
 - f. The total volatile organic compound emission rate for all water treatment material employed [sum of d)(3)d. for water treatment materials];
 - g. The annual, year to date volatile organic compound emissions from all coating materials employed [sum of d)(3)e. for each calendar month to date from January to December]; and
 - h. The annual, year to date volatile organic compound emissions from all water treatment materials employed [sum of d)(3)f for each calendar month to date from January to December].
[OAC 3745-77-07(C)(1) and PTI 03-13730]



- (4) The permittee shall collect and record the following information each month for all clean-up materials employed in this emissions unit:
- a. the name and identification number of each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content, in pounds per gallon, of each cleanup material employed;
 - d. the OC emission rate for each cleanup material [d)(4)b x d)(4)c], in pounds;
 - e. the total OC emission rate for all cleanup materials [summation of d)(4)d], in pounds or tons; and
 - f. the annual, year to date OC emissions from all cleanup materials employed [summation of d)(4)e for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density
[OAC 3745-77-07(C)(1) and PTI 03-13730]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing an exceedance of the limitation on hours of operation as indicated in c)(1). The notifications shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- (2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the electrical interlock system did not operate properly, allowing operation of the emission unit without water wash and scrubber control operation as indicated in c)(2). The notifications shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- (3) The permittee shall submit annual reports that specify the total VOC emissions (for the coatings, and water treatment, and cleanup - each operation separately) for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year for the emissions unit as a separate report submitted electronically through Ohio EPA Air Services, or alternatively, can be specified in the facility's annual Fee Emissions Report.
[OAC 3745-77-07(C)(1) and PTI 03-13730]

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- 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. Emission Limitation:
1.97 lbs VOC /hr; 39.4 lbs OC/day (from coating operations)
- Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- *The potential to emit is based on a maximum material usage rate of 21.9 gallons per hour and a maximum OC content of 0.09 lb/gal.
- The daily OC emission limitation is based on the emission units hourly potential to emit in conjunction with the restriction specified in c)(1) of 20 hours of operation per day. Therefore, if compliance is demonstrated with the limitation on hours of operation, compliance with the daily emissions limitation shall also be demonstrated.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- b. Emission Limitation:
7.19 ton VOC /yr (from coating operations)
- Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in d)(3)g.
[OAC 3745-77-07(C)(1) and PTI 03-13730]
- c. Emission Limitation:
302 lbs VOC /month (from water treatment)



Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3)f.
[OAC 3745-77-07(C)(1) and PTI 03-13730]

d. Emission Limitation:

1.80 ton VOC /yr (from water treatment)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3)h.
[OAC 3745-77-07(C)(1) and PTI 03-13730]

e. Emission Limitation:

1.03 ton OC /month (from cleanup operations)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4)e.
[OAC 3745-77-07(C)(1) and PTI 03-13730]

f. Emission Limitation:

12.3 ton VOC /yr (from cleanup operations)

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(4)f.
[OAC 3745-77-07(C)(1) and PTI 03-13730]

g. Emission Limitation:

0.8 lb VHAP/lb solids, as applied, for coatings; and 10% VHAP, by weight, for thinners.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section d)(5) and the procedures in sections f)(3).
[OAC 3745-77-07(C)(1) and PTI 03-13730]

h. Emission Limitation:

0.67 lb PE/hour and 2.45 tons PE/year

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E \text{ (hourly)} = (\text{maximum coating solids content in lbs/gal}) (\text{maximum gallon usage rate}) \times (1 - TE \text{ for rollcoater})(1 - CE \text{ for water wash and scrubber})$$

where:

$$E \text{ (hourly)} = PE \text{ rate in lbs/hr}$$

$$\text{Maximum Coating Solids Content} = 8.69 \text{ lbs/gal}$$

$$\text{Maximum Gallon Usage Rate} = 21.90 \text{ gals/hr}$$



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 65%)

CE = Control Efficiency of the control equipment (assumed to be 99% for water wash and scrubber)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the hourly limitation by 7300 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13730]

i. Emission Limitation:

Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI 03-13730]

(2) Formulation data or U.S. EPA Method 24 shall be used to determine the OC content of the coatings / clean-up materials.

[OAC 3745-77-07(C)(1) and PTI 03-13730]

g) Miscellaneous Requirements

(1) None.

14. K001, Fritz Coater

Operations, Property and/or Equipment Description:

Fritz Paper Coater

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.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-17-11(C)	See b)(2)b.
c.	OAC rule 3745-21-09(F)	The VOC content of the coatings shall not exceed 2.9 pounds per gallon, excluding water and exempt solvents, for the paper coating line.
d.	40 CFR, Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420) [In accordance with 40 CFR 63.3300, this emission unit is a new web coating line subject to the emissions limitations and control measures specified in this section.]	Organic Hazardous Air Pollutant (HAP) shall be limited to one of the following: No more than 2 percent of the organic HAP applied for each month (98% reduction) [40 CFR 63.3320(b)(1)]; or No more than 1.6 percent of the mass of coating materials applied for each month [40 CFR 63.3320(b)(2)]; or No more than 8 percent of the coating solids applied for each month [40 CFR 63.3320(b)(3)] See b)(2)d.
e.	40 CFR 63.1-16	Table 2 of 40 CFR, Part 63, Subpart JJJJ- Applicability of General Provisions to Subpart JJJJ show which parts of the General Provisions in 40 CFR 63.1-16 apply.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements established pursuant to ORC rule 3704.03(T) have been determined to be equivalent to 40 CFR, Part 63, Subpart JJJJ.
- b. This emissions unit is exempt from the requirements specified in OAC rule 3745-17-11(C), pursuant to OAC rule 3745-17-11(A)(1)(h).
- c. Potential VOC emissions* from cleanup operations have been determined to be negligible. Therefore, no emission limits will be established for VOC from cleanup operations under OAC rule 3745-31-05(A)(3).

*Potential VOC emissions:

$(6.9 \text{ gallons cleanup applied/month})(7.08 \text{ lbs VOC/gallon cleanup})(12 \text{ months/yr})(1 \text{ ton}/2000 \text{ lbs}) = 0.29 \text{ ton VOC/yr from cleanup operations}$

- d. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all coatings employed in this emission unit:
 - a. The name and identification of each coating as applied; and
 - b. The VOC content of each coating, excluding water and exempt solvents, in lbs/gallon, as applied

This information does not have to be kept on a line-by-line basis. Also, if an owner or operator mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

[OAC 3745-77-07(C)(1) and PTI# P0118287]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

[OAC 3745-77-07(C)(1) and PTI# P0118287]



- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

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. Emission Limitation:

The VOC content of the coatings shall not exceed 2.9 pounds per gallon, excluding water and exempt solvents, for the paper coating line.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated in accordance with the recordkeeping requirements specified in section d)(2) of this permit.

[OAC 3745-77-07(C)(1), OAC rule 3745-21-09(F) and PTI# P0118287]

- b. Emission Limitations:

No more than 2 percent of the organic HAP applied for each month (98% reduction); or

No more than 1.6 percent of the mass of coating materials applied for each month); or

No more than 8 percent of the coating solids applied for each month

Applicable Compliance Method:

Compliance with these emission standards shall be demonstrated in accordance with 40 CFR 63.3370.

[OAC 3745-77-07(C)(1), 40 CFR, Part 63, Subpart JJ, and PTI# P0118287]

g) Miscellaneous Requirements

- (1) None.



15. P337, ME 6953 & ME6939

Operations, Property and/or Equipment Description:

Wide Panel Wrapper & Edge Filler (Sauder Street)

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) b)(1)b. b)(2)c. and b)(2)d.

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), June 30, 2008	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), June 30, 2008	See b)(2)c. and b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e.
d.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.800(h) this emission unit is a new wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	Work Practice Standards [40 CFR 63.803] See b)(1)f.
e.	40 CFR 63.1-16	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(1) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) have been determined to be equivalent to 40 CFR, Part 63, Subpart JJ – National Emissions Standards for Wood Furniture Manufacturing Operations.

b. This Best Available Technology (BAT) limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).



- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the potential to emit is less than 10 tons/yr.
- d. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] as part of the Ohio SIP.
- e. This emissions unit is exempt from the requirements specified in OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(h).
- f. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.

16. P338, 360 Wrapper

Operations, Property and/or Equipment Description:

360 Wrapper ME7002 with Corona Treatment Capability

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.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-17-11(C)	See b)(2)b.
c.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.800(h) this emission unit is a new wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	Work Practice Standards [40 CFR 63.803] See b)(1)c.
d.	40 CFR 63.1-16	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established pursuant to ORC rule 3704.03(T) have been determined to be equivalent to 40 CFR, Part 63, Subpart JJ – National Emission Standards for Hazardous Air Pollutants; Wood Furniture Manufacturing Operations.

b. This emissions unit is exempt from the requirements specified in OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(h).



- c. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).

- c) Operational Restrictions
 - (1) None.

- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.

- e) Reporting Requirements
 - (1) None.

- 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. None.

- g) Miscellaneous Requirements
 - (1) None.



17. P339, Drawer Wrapper

Operations, Property and/or Equipment Description:

Drawer Wrapper ME7001 with Corona Treatment Capability

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) b)(1)b. and b)(2)c.

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) June 30, 2008	See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic Compound (VOC) emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)c.
c.	OAC rule 3745-17-11(C)	See b)(2)d.
d.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.800(h) this emission unit is a new wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	Work Practice Standards [40 CFR 63.803] See b)(2)e.
e.	40 CFR 63.1-16	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



- (2) Additional Terms and Conditions
 - a. The Best Available Technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) have been determined to be equivalent to 40 CFR, Part 63, Subpart JJ – National Emission Standards for Hazardous Air Pollutants; Wood Furniture Manufacturing Operations.
 - b. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] in the Ohio State Implementation Plan (SIP).
 - c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) [the less than 10 tons per year BAT exemption] in the Ohio SIP.
 - d. This emissions unit is exempt from the requirements specified in OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(h).
 - e. The permittee is referred to "B. - Facility-Wide Terms and Conditions" of this permit, for the MACT Subpart JJ requirements for this emissions unit (see Sections B.2 through B.8).
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) None.
- 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. None.
- g) Miscellaneous Requirements
 - (1) None.



18. Emissions Unit Group -Group A - pneumatic wood waste collectors - 72,000 ACFM: P303, P304, P305, P306, P307, P308, P309, P313, P314, P401, P402, P403, P404, P406, P504, P507, P508

EU ID	Operations, Property and/or Equipment Description
P303	wood waste handling system (3370 SWC)
P304	wood waste handling system (3371 SWC)
P305	wood waste handling system (1199 SWC)
P306	wood waste handling system (1301 SWC)
P307	wood waste handling system (1596 SWC)
P308	wood waste handling system (2926 SWC)
P309	wood waste handling system (2700 SWC)
P313	wood waste handling system (4122 SWC)
P314	wood waste handling system (4123 SWC)
P401	wood waste handling system (2946 SWC)
P402	wood waste handling system (2947 SWC)
P403	wood waste handling system (2948 SWC)
P404	wood waste handling system (3250 SWC)
P406	wood waste handling system (4130 SWC)
P504	wood waste handling system (3369 SWC)
P507	wood waste handling system (2925 SWC)
P508	wood waste handling system (4304 SWC)

- 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 03-13508 issued December 4, 2001)	2.59 lbs particulate emissions (PE) /hr; 11.34 tons PE /yr (for each emissions unit) 1.85 lbs particulate matter 10 microns or less in size (PM ₁₀) /hr; 8.10 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.] See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE /dscf; 0.0030 gr PM ₁₀ /dscf See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), and Best Available Control Technology (BACT) under 40 CFR 52.21 (Prevention of Significant Deterioration - PSD), have been determined to be: use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf.

BAT requirements also include: visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

b. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

a. None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the location and color of the emissions;

- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13508]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13508]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
 - d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
2.59 lbs PE /hr; 11.34 tons PE /yr (for each emissions unit)
1.85 lbs PM₁₀ /hr; 8.10 tons PM₁₀ /yr (for each emissions unit)



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
- ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13508]

c. Emission Limitation:

Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI 03-13508]

g) Miscellaneous Requirements

- (1) None.



19. Emissions Unit Group -Group B - pneumatic wood waste collectors - 72,000 ACFM: P302, P311, P312, P505, P506

EU ID	Operations, Property and/or Equipment Description
P302	wood waste handling system (2152 SWC)
P311	wood waste handling system (1188 SWC)
P312	wood waste handling system (1938 SWC)
P505	wood waste handling system (2176 SWC)
P506	wood waste handling system (2177 SWC)

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 03-13447 issued November 5, 2002)	2.59 lbs particulate emissions (PE) /hr; 11.34 tons PE /yr (for each emissions unit) 1.85 lbs particulate matter 10 microns or less in size (PM ₁₀) /hr; 8.10 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.ii.] See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf; and



- ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.
 - b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.
- c) Operational Restrictions
 - a. None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
- e) Reporting Requirements
 - (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- f) Testing Requirements
 - (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
2.59 lbs PE /hr; 11.34 tons PE /yr (for each emissions unit)
1.85 lbs PM₁₀ /hr; 8.10 tons PM₁₀ /yr (for each emissions unit)

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13447]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.

20. Emissions Unit Group -Group C - pneumatic wood waste collectors - 72,000 ACFM: P407, P509, P510, P511

EU ID	Operations, Property and/or Equipment Description
P407	wood waste handling system (5046)
P509	wood waste handling system (4613 SWC)
P510	wood waste handling system (4614 SWC)
P511	wood waste handling system (4615 SWC)

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 03-13201 issued June 27, 2002)	2.59 lbs particulate emissions (PE) /hr; 11.34 tons PE /yr (for each emissions unit) 1.85 lbs particulate matter 10 microns or less in size (PM ₁₀) /hr; 8.10 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.] See b)(2)b.
b.	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE /dscf; 0.0030 gr PM ₁₀ /dscf See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), and Best Available Control Technology (BACT) under 40 CFR 52.21 (Prevention of Significant Deterioration - PSD), have been determined to be: use of a wood waste handling operation with pneumatic conveying and a collection



system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf.

BAT requirements also include: visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

- b. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.
- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

- a. None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emissions incident; and
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13201]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC 3745-77-07(C)(1) and PTI 03-13201]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
 - d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
 - f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
2.59 lbs PE /hr; 11.34 tons PE /yr (for each emissions unit)
1.85 lbs PM₁₀ /hr; 8.10 tons PM₁₀ /yr (for each emissions unit)

Applicable Compliance Method:

The hourly PE limitation was developed by multiplying the maximum outlet concentration of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

The hourly PM₁₀ limitation was developed by multiplying the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 72,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations in accordance with:

- i. PE: Methods 1 - 5, of 40 CFR 60, Appendix A
ii. PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760 hr/yr, and then dividing by 2000 lb/ton. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13201]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13201]

g) Miscellaneous Requirements

- (1) None.



21. Emissions Unit Group -Group D - pneumatic wood waste collectors - 50,000 ACFM: P400, P405, P503

EU ID	Operations, Property and/or Equipment Description
P400	wood waste handling system (2951 SWC)
P405	wood waste handling system (3219 SWC)
P503	wood waste handling system (3241 SWC)

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 03-13508 issued December 4, 2001)	1.80 lbs particulate emissions (PE) /hr; 7.88 tons PE /yr (for each emissions unit) 1.29 lbs particulate emissions less than 10 microns (PM ₁₀) /hr; 5.65 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.] See b)(2)b.
b.	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE /dscf; 0.0030 gr PM ₁₀ /dscf See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), and Best Available Control Technology (BACT) under 40 CFR 52.21 (Prevention of Significant Deterioration - PSD), have been determined to be: use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf.

BAT requirements also include: visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

- b. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.
- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions.
 - b. the total duration of any visible emissions incident.
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13508]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13508]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
 - d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

- f. Personnel from the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (2) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
1.80 lbs PE /hr; 7.88 tons PE /yr (for each emissions unit)
1.29 lbs PM₁₀ /hr; 5.65 tons PM₁₀ /yr (for each emissions unit)

Applicable Compliance Method:

The hourly PE limitation was established by applying the emission limitation of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 50,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0042 gr PE /dscf, compliance with the hourly limitation shall also be demonstrated.

The hourly PM₁₀ limitation was established by applying the emission limitation of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 50,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf, compliance with the hourly limitation shall also be demonstrated.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13508]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13508]

g) Miscellaneous Requirements

- (1) None.



22. Emissions Unit Group -Group E - pneumatic wood waste collectors - 50,000 ACFM: P310, P500, P501, P502

EU ID	Operations, Property and/or Equipment Description
P310	wood waste handling system (1073 SWC)
P500	wood waste handling system (1513 SWC)
P501	wood waste handling system (307 SWC)
P502	wood waste handling system (381 SWC)

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 03-13447 issued November 5, 2002)	1.80 lbs particulate emissions (PE) /hr; 7.88 tons PE /yr (for each emissions unit) 1.29 lbs particulate emissions less than 10 microns (PM ₁₀) /hr; 5.65 tons PM ₁₀ /yr (for each emissions unit) opacity restrictions [See b)(2)a.ii.] See b)(2)a.
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) have been determined to be:

i. use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains particulate emissions (PE) /dscf and 0.0030 grains particulate matter 10 microns or less in size (PM10) /dscf;



- ii. visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.
 - b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions.
 - b. the total duration of any visible emissions incident.
 - c. any corrective actions taken to eliminate the visible emissions.

[OAC 3745-77-07(C)(1) and PTI 03-13447]
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.

[OAC 3745-77-07(C)(1) and PTI 03-13447]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
 - a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
 - d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
[OAC 3745-77-07(C)(1)]
- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

Personnel from the Director (the Ohio EPA, Northwest District Office) shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information

necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (3) 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. Emission Limitations:
0.0042 gr PE /dscf
0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

- b. Emission Limitations:
1.80 lbs PE /hr; 7.88 tons PE /yr (for each emissions unit)
1.29 lbs PM₁₀ /hr; 5.65 tons PM₁₀ /yr (for each emissions unit)

Applicable Compliance Method:

The hourly PE limitation was established by applying the emission limitation of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 50,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0042 gr PE /dscf, compliance with the hourly limitation shall also be demonstrated.

The hourly PM₁₀ limitation was established by applying the emission limitation of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 50,000 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf, compliance with the hourly limitation shall also be demonstrated.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13447]



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

- c. Emission Limitation:
Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.
[OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.

23. Emissions Unit Group -Group F - pneumatic wood waste collectors 20,280 ACFM: P200, P202

EU ID	Operations, Property and/or Equipment Description
P200	wood waste handling system (2729 SWC)
P202	wood waste handling system (2730 SWC)

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 03-13508 issued December 14, 2001)	0.73 lb particulate emissions (PE) /hr; 3.20 tons PE /yr 0.52 lb particulate emissions less than 10 microns (PM ₁₀) /hr; 2.28 tons PM ₁₀ /yr opacity restrictions [See b)(2)a.] See b)(2)a.
b.	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE /dscf; 0.0030 gr PM ₁₀ /dscf See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), and Best Available Control Technology (BACT) under 40 CFR 52.21 (Prevention of Significant Deterioration - PSD), have been determined to be: use of a wood waste handling operation with pneumatic conveying and a collection system with a maximum outlet concentration of 0.0042 grains PE /dscf and 0.0030 grains PM₁₀ /dscf.

BAT requirements also include: visible emissions not exceeding 5% opacity, as a six-minute average, from the wood waste handling system exhaust stack.

- b. The requirements of OAC rule 3745-31-05(A)(3)(a) also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.
 - c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
 - d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions.
 - b. the total duration of any visible emissions incident.
 - c. any corrective actions taken to eliminate the visible emissions.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
- e) Reporting Requirements
- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period. The reports shall be submitted electronically through Ohio EPA Air Services.
[OAC 3745-77-07(C)(1) and PTI 03-13447]
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC 3745-77-07(C)(1)]
- f) Testing Requirements
- (1) The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:

- a. The emission testing shall be conducted within six months of the issuance of Permit #P0103867, issued 6/6/2012. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
- b. The emission testing shall be conducted to demonstrate compliance with the maximum allowable outlet concentrations for PE and PM₁₀. Compliance with maximum allowable outlet concentrations for PE and PM₁₀ shall be demonstrated by conducting emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest worst-case outlet concentration. [See f)(2).]
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable PE and PM₁₀ outlet concentration:

PE: Methods 1 - 5, of 40 CFR 60, Appendix A
PM₁₀: Method 201 /201A, and 202, of 40 CFR 51, Appendix M.
- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.

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

- (2) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest District Office). 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). The notification shall indicate the specific emissions unit(s) which are being tested to meet the requirements of f)(1)b. Accompanying the specified emissions units should be documentation which outlines why the specified emissions unit(s) are representative of wood waste handling systems with the greatest worst-case PE and PM₁₀ outlet concentration. Failure to submit such notification for review and approval prior to the test(s) may result in the Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).

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

- (3) 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. Emission Limitations:

0.0042 gr PE /dscf

0.0030 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable PE and PM₁₀ limitations based on the results of emission testing. [See f)(1).]

b. Emission Limitations:

0.73 lbs PE /hr; 3.20 tons PE /yr (for each emissions unit)

0.52 lbs PM₁₀ /hr; 2.28 tons PM₁₀ /yr (for each emissions unit)

Applicable Compliance Method:

The hourly PE limitation was established by applying the emission limitation of 0.0042 gr PE /dscf to a total maximum volumetric air flow rate of 20,280 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0042 gr PE /dscf, compliance with the hourly limitation shall also be demonstrated.

The hourly PM₁₀ limitation was established by applying the emission limitation of 0.0030 gr PM₁₀ /dscf to a total maximum volumetric air flow rate of 20,280 dry standard cubic foot per minute (dscfm) and applying the conversion factors of 7000 gr/pound and 60 minutes/hour. Therefore, provided compliance is shown with the maximum outlet concentration of 0.0030 gr PM₁₀ /dscf, compliance with the hourly limitation shall also be demonstrated.

The annual allowable limitations were developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance with the hourly limitation is shown, compliance with the annual limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI 03-13447]

c. Emission Limitation:

Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.



Proposed Title V Permit
Sauder Woodworking
Permit Number: P0119321
Facility ID: 0326000203

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with US EPA Method 9 of 40 CFR 60, Appendix A.

[OAC 3745-77-07(C)(1) and PTI 03-13447]

g) Miscellaneous Requirements

- (1) None.