Ohio Environmental Protection Agency

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

Certified Mail

12/9/2015

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

David Schlabach
Schlabach Woodworks
6660 State Rt. 241
Millersburg, OH 44654

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000165
Permit Number: P0119722
Permit Type: Renewal
County: Holmes

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-NEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Schlabach Woodworks

Facility ID:	0238000165
Permit Number:	P0119722
Permit Type:	Renewal
Issued:	12/9/2015
Effective:	12/9/2015
Expiration:	12/9/2025

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Schlabach Woodworks

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Authorization

Facility ID:	0238000165
Application Number(s):	A0054544
Permit Number:	P0119722
Permit Description:	PTIO Renewal permit for natural gas-fired engines, woodworking operations and surface coating operations (facility is transitioning from synthetic minor)..
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	12/9/2015
Effective Date:	12/9/2015
Expiration Date:	12/9/2025

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Schlabach Woodworks
6660 SR 241
Millersburg, OH 44654

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119722
Permit Description: PTIO Renewal permit for natural gas-fired engines, woodworking operations and surface coating operations (facility is transitioning from synthetic minor)..

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

Emissions Unit ID:	**P005**
Company Equipment ID:	Natural Gas Burning Engine 3
Superseded Permit Number:	P0115517
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Natural Gas Burning Engine
Superseded Permit Number:	P0119371
General Permit Category and Type:	Not Applicable

Group Name: Wood Coating Operations

Emissions Unit ID:	**R001**
Company Equipment ID:	Spray Booth A
Superseded Permit Number:	P0106987
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Spray Booth B
Superseded Permit Number:	P0106987
General Permit Category andType:	Not Applicable

Group Name: Woodworking Operations

Emissions Unit ID:	**P001**
Company Equipment ID:	Dust Collection System #1-Molder
Superseded Permit Number:	P0115425
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Dust Collection System #2-Sander
Superseded Permit Number:	P0115425
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: *http://www.epa.gov/ttn/atw/area/arearules.html*.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. P005, Natural Gas Burning Engine 3

Operations, Property and/or Equipment Description:

280 hp 4SLB SI RICE natural gas fired engine, manufactured and installed in 1998.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 lb/MMBtu of actual heat input.
c.	OAC rule 3745-18-06(A)	Exempt. See b)(2)a.
d.	OAC rule 3745-31-05(A)(3) As effective 11/1/2001	See b)(2)c. and c)(1).
e.	OAC rule 3745-31-05(A)(3) As effective 12/1/2006	See b)(2)d. and b)(2)e.
f.	ORC 3704.03(T)	See b)(2)f. and c)(2).
g.	40 CFR Part 60, subpart JJJJ	Exempt. See b)(2)g.
h.	ORC 3704.03(F)	See b)(2)h.

(2) Additional Terms and Conditions

a. Fuel burning equipment that burns only natural gas is exempt from the requirements of OAC rule 3745-18-06.

b. This stationary internal combustion engine having an energy output capacity of two hundred eighty (280) horsepower, which is less than two thousand horsepower, and subject to the exemption under OAC rule 3745-110-03(K)(3). In accordance with OAC rule 3745-110-02(A), the requirements of OAC rule 3745-110 is not applicable to NO_X emissions from this emissions unit.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)e, b)(2)c, c)(1), and d)(1).

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

e. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of CO, particulate, SO_2, and OC from this air contaminant source since the uncontrolled potential to emit for the emissions of CO, particulate, SO_2, and OC is less than 10 tons per year.

f. The requirements established pursuant to this rule are equivalent to the requirements under 40 Code of Federal Regulations (CFR) Part 63, subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

g. This engine was manufactured before July 1, 2008 and has not been modified or reconstructed after June 12, 2006. Therefore, this engine is exempt from the requirements under this regulation.

h. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because emissions units that solely emit air pollutants from the combustion of fossil fuels are exempt from a toxic air contaminant evaluation per ORC 3704.03(F)(4)(f)(i). OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of

the materials, or use of new materials, that may subject any of the emissions units to additional or different applicable rule requirements may require the permittee to apply for and obtain a new PTI.

c) Operational Restrictions

(1) The permittee shall operate and maintain this emissions unit which meets the following work practices:

a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first;

b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and

c. Inspect all hoses and belts every 1,440 hours operation or annually, whichever comes first, and replace as necessary.

(2) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records demonstrating compliance with operational restriction in section c)(1) of this permit.

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

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office of Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Opacity Limitation</u>:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

b. Emission Limitation:

0.310 lb PE/MMBtu

Applicable Compliance Method:

The particulate emission limitation is from OAC rule 3745-17-11(B)(5) for stationary internal combustion engines.

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.

2. P006, Natural Gas Burning Engine

Operations, Property and/or Equipment Description:

280 HP Cummins natural gas 4SLB non-emergency generator. Model Number: 8.9 LG320, Engine Number: 46506901, DOM: 6/22/05.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	The exhaust gases from this engine are designed to meet the following emissions limitations: Nitrogen oxides (NOx) emissions shall not exceed 1.4 g/bhp-hr. Carbon monoxide (CO) emissions shall not exceed 1.3 g/bhp-hr. Volatile organic compounds (VOC) emissions shall not exceed 0.01 g/bhp-hr. See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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 NO_x, CO, and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/yr. See b)(2)b.
c.	OAC rule 3745-18-06(A)	Exempt. See b)(2)c.
d.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 lb/mmBtu of actual heat input.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
f.	40 CFR 60 Subpart JJJJ 60.4230(a)(4)(iii)	Exempt. Manufactured prior to 7/1/2008.

(2) Additional Terms and Conditions

a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.

c. Stationary internal combustion engines (ICE) that burn only natural gas are exempt from the requirements of OAC rule 3745-18-06.

c) Operational Restrictions

(1) Except during periods of startup, the permittee shall change the oil and filter every 1,440 hours of operation or annually, whichever comes first; shall inspect the spark plugs every 1,440 hours of operation or annually, whichever comes first; and shall inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace them as necessary.

(2) During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(3) The permittee shall operate and maintain the engine according to the manufacturer's emission-related operation and maintenance instructions; or develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and

operations of the engine in a manner consistent with good air pollution control practice for minimizing pollution.

(4) The permittee shall have the option of utilizing an oil analysis program in order to extend the oil change requirement specified in c)(1). The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the operating hours for this emissions unit.

(2) The permittee shall maintain an operating log that documents all maintenance conducted on the engine.

(3) The permittee shall keep records of the parameters that are analyzed as part of the oil analysis program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Source Design Characteristic:</u>
NOx emissions shall not exceed 1.4 g/bhp-hr

Applicable Compliance Method:
The NO_x emission limitation is based on engine manufacturer specifications.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7E.

Source Design Characteristic:
CO emissions shall not exceed 1.3 g/bhp-hr

Applicable Compliance Method:
The CO emission limitation is based on engine manufacturer specifications.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

b. Source Design Characteristic:
VOC emissions shall not exceed 0.01 g/bhp-hr

Applicable Compliance Method:
The VOC emission limitation is based on engine manufacturer specifications.

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25A.

c. Opacity Limitation:
Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:
If required, compliance with this emissions limitation shall be demonstrated by visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

d. Emission Limitation:
PE shall not exceed 0.310 lb/mmBtu of actual heat input

Applicable Compliance Method:
The PE limitation is from OAC rule 3745-17-11(B)(5) for stationary internal combustion engines.

If required, compliance with this limit shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Wood Coating Operations: R001, R002

EU ID	Operations, Property and/or Equipment Description
R001	Spray Booth A - Paint and Stain
R002	Spray Booth B - Paint and Stain

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), d)(2), d)(3), d)(4), d)(5), d(6), d)(7) and e)(1).
c.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
d.	OAC rule 3745-31-05(A)(3), As effective November 30, 2010	9.13 pounds per hour and 5.93 tons per year of OC emissions from emissions unit R001. See b)(2)b and b)(2)c.
e.	OAC rule 3745-31-05(A)(3)(a)(ii) As effective December 1st, 2006	See b)(2)c and b)(2)d.
h.	ORC 3704.03(F)(4)(c)	See g)(2).

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.

b. 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant 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 Plant (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, then these emission limits/control measures no longer apply.

c. Organic Compound (OC) emissions from emissions unit R002 shall not exceed

i. 18.27 pounds per hour; and

ii. 11.88 tons per year.

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

c) Operational Restrictions

(1) All exhaust from each emissions unit, R001 or R002, shall pass through the dry filters whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day:

a. the name and identification number for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the OC content of each coating and cleanup material, in pounds per gallon;

d. the total OC emissions, in pounds per day, from all coatings and cleanup materials employed, i.e., the sum of "b" times "c";

e. the total number of hours each emissions unit was in operation; and

f. the average hourly OC emissions, in pounds per hour, from all coatings and cleanup materials, i.e., "d"/"e".

(2) The permittee shall maintain daily records for this emissions unit that document all time periods during which any dry filters were not in service when the emissions unit was in operation.

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

(4) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.

(5) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

(6) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

(7) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

e) Reporting Requirements

(1) The permittee shall notify the Director in writing of any daily record that indicates the dry filters were 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 (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

(2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

OC emissions from R001 shall not exceed 9.13 pounds per hour and 5.93 tons per year.

Applicable Compliance Method:

Compliance with the emission limitations shall be determined based upon the record keeping requirements specified in d)(1) and shall be the summation of the calendar year for the annual limit.

b. Emission Limitation:

OC emissions from R002 shall not exceed 18.27 pounds per hour and 11.88 tons per year.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined based upon the record keeping requirements specified in d)(1) and shall be the summation of the calendar year for the annual limit.

(2) Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) The facility has reformulated coatings that emit lower levels of VOC and Air Toxics since FEPTIO permit P0106987 was issued. Therefore, the facility is now considered to be an inherent minor facility and modeling for Air Toxics is no longer required - see g)(2) below.

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because each emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and

obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

4. Emissions Unit Group - Woodworking Operations: P001, P002

EU ID	Operations, Property and/or Equipment Description
P001	Wood working shop controlled by dust collection system #1, consisting of a primary cyclone and a secondary 4,800 acfmbaghouse.
P002	Wood working shop controlled by dust collection system #2, consisting of a primary cyclone and a secondary 5,500 acfmbaghouse.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-17-07(A)	See b)(2)a.
b.	OAC 3745-17-07(B)	See b)(2)b.
c.	OAC 3745-17-08(B)	See b)(2)c.
d.	OAC 3745-17-11	See b)(2)d and b)(2)e.
e.	OAC 3745-31-05(A)(3)	See b)(2)f and b)(2)g

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-07(A)(3)(h), these emissions units are exempt from the visible particulate emission limitation.

b. In accordance with OAC rule 3745-17-07(B)(11)(d), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08(B).

c. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08(A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08(B).

d. The uncontrolled emission rate for these emissions units cannot be ascertained, and therefore, in accordance with OAC rule 3745-17-11(A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.

e. The facility is located in Holmes County. It is exempt from Table I requirements, per OAC rule 3745-17-11(A)(2)(b).

f. The emissions from these emissions units shall be vented to the dust collection system, as follows, at all times when the emissions unit is in operation:

i. For emissions unit P001, a primary cyclone and a secondary 4,800 cfm baghouse; and

ii. For emissions unit P002, a primary cyclone and a secondary 5,500 cfm baghouse.

g. Particulate emissions from these emissions units shall not exceed the following:

i. For emissions unit P001, 1.23 pounds per hour; and

ii. For emissions unit P002, 0.84 pound per hour.

c) Operational Restrictions

(1) The baghouse shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emission at the point(s) of capture to the extent possible with good engineering design.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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:

Particulate emissions from these emissions units shall not exceed the following:

i. For emissions unit P001, 1.23 pounds per hour; and

ii. For emissions unit P002, 0.84 pound per hour.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.