



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

5/15/2009

Mr. Tim More  
MASCO Retail Cabinet Group, LLC (KraftMaid - Plant 3)  
15535 South State Street  
P.O. Box 1055  
Middlefield, OH 44062

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0204000360  
Permit Number: P0104093  
Permit Type: Renewal  
County: Ashtabula

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**FINAL**

**Air Pollution Permit-to-Install and Operate**  
for  
MASCO Retail Cabinet Group, LLC (KraftMaid - Plant 3)

Facility ID: 0204000360  
Permit Number: P0104093  
Permit Type: Renewal  
Issued: 5/15/2009  
Effective: 5/15/2009  
Expiration: 12/29/2013





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
MASCO Retail Cabinet Group, LLC (KraftMaid - Plant 3)

**Table of Contents**

- Authorization ..... 1
- A. Standard Terms and Conditions ..... 3
  - 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
  - 2. Who is responsible for complying with this permit? ..... 4
  - 3. What records must I keep under this permit? ..... 4
  - 4. What are my permit fees and when do I pay them?..... 4
  - 5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
  - 6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
  - 7. What reports must I submit under this permit? ..... 5
  - 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? ..... 5
  - 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5
  - 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
  - 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
  - 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
  - 13. Can I transfer this permit to a new owner or operator?..... 6
  - 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
  - 15. What happens if a portion of this permit is determined to be invalid? ..... 7
- B. Facility-Wide Terms and Conditions..... 8
- C. Emissions Unit Terms and Conditions ..... 10
  - 1. F002, Storage Silo and Truck Loading.....11
  - 2. P002, Woodworking Equipment which exhausts into baghouse P3-20866.....16
  - 3. P003, Woodworking Equipment which exhausts into baghouse P3-12742.....23
  - 4. P004, Woodworking Equipment which exhausts into baghouse P3-12743.....29





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104093  
**Facility ID:** 0204000360  
**Effective Date:** 5/15/2009

# Authorization

Facility ID: 0204000360  
Application Number(s): A0036161  
Permit Number: P0104093  
Permit Description: First FEPTIO to modify these emissions units, which are currently permitted in a PTI.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/15/2009  
Effective Date: 5/15/2009  
Expiration Date: 12/29/2013  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MASCO Retail Cabinet Group, LLC (KraftMaid - Plant 3)  
150 GRAND VALLEY AVE.  
ORWELL, OH 44076

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

Ohio 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 43087  
(330)425-9171

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

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0104093

Permit Description: First FEPTIO to modify these emissions units, which are currently permitted in a PTI.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	Storage Silo and Truck Loading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	P3-20866
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	P3-12742
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	P3-12743
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

## **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 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 Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

## **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 following is a list of the tables of emissions units which is attached to this permit-to-install/operate:

Table P3-P2	P002 - Emission Units which are vented to Baghouse P3-20866
Table P3-P3	P003 - Emission Units which are vented to Baghouse P3-12742
Table P3-P4	P004 - Emission Units which are vented to Baghouse P3-12743



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104093  
**Facility ID:** 0204000360  
**Effective Date:** 5/15/2009

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



**1. F002, Storage Silo and Truck Loading**

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

Sawdust storage silo and truck loading with 1500 cfm baghouse (P3-13430) to control emissions from loading into the silo and 21,200 cfm baghouse (P1-13323) to control emissions from truck loading

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. b)(1), d)(1), d)(2), d)(3), e)(1), e)(2), e)(3) and f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(D)(1)(b)          MODIFIED	Particulate emissions (PE) shall not exceed 0.005 grain per dscf from each baghouse stack.  Particulate matter less than 10 microns (PM-10) shall not exceed 0.0025 grain per dscf from each baghouse stack.  PE from loading sawdust into the storage silo shall not exceed 0.06 lb/hr and 0.28 tpy from the baghouse P3-13430 exhaust.  PM-10 emissions from loading sawdust into the storage silo shall not exceed 0.03 lb/hr and 0.14 tpy from the baghouse P3-13430 exhaust.  PE from loading sawdust into trucks from



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>the storage silo shall not exceed 0.91 lb/hr and 3.98 tpy from the baghouse P1-13323 exhaust.</p> <p>PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.45 lb/hr and 1.99 tpy from the baghouse P1-13323 exhaust.</p> <p>Visible particulate emissions from each baghouse shall not exceed 0% opacity as a 6-minute average.</p> <p>Fugitive PE and PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.59 tpy.</p> <p>Visible emissions of fugitive dust from loading sawdust into trucks from the storage silo shall not exceed 10% opacity as a 3-minute average.</p>
b.	<p>OAC rule 3745-17-11(B) OAC rule 3745-17-07(A) OAC rule 3745-17-08(B) OAC rule 3745-17-07(B)</p>	<p>The requirements established pursuant to OAC rules 3745-17-11(B), 3745-17-07(A), 3745-17-08(B) and 3745-17-07(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D)(1)(b).</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the color of the emissions;
- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.



- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from loading sawdust into trucks. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) Notwithstanding the frequency of reporting requirements specified in d)(1) and d)(2), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
  - a. for 1 full quarter the facility's visual observations indicate no visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

e) Reporting Requirements

- (1) The permittee shall submit annual written reports that (a) identify all days during which any visible particulate emissions were observed from either baghouse 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 Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year.
- (2) The permittee shall submit annual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the truck loading area and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

Visible particulate emissions from each baghouse shall not exceed 0% opacity as a 6-minute average.

Visible emissions of fugitive dust from loading sawdust into trucks from the storage silo shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and (B)(3), as appropriate.

b. Emission Limitations:

PE shall not exceed 0.005 grain per dscf from each baghouse stack.

PM-10 shall not exceed 0.0025 grain per dscf from each baghouse stack.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

c. Emission Limitations:

PE from loading sawdust into the storage silo shall not exceed 0.06 lb/hr and 0.28 tpy from the baghouse P3-13430 exhaust.

PM-10 emissions from loading sawdust into the storage silo shall not exceed 0.03 lb/hr and 0.14 tpy from the baghouse P3-13430 exhaust.

PE from loading sawdust into trucks from the storage silo shall not exceed 0.91 lb/hr and 3.98 tpy from the baghouse P1-13323 exhaust.

PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.45 lb/hr and 1.99 tpy from the baghouse P1-13323 exhaust.

Applicable Compliance Method:

These limitations are based upon the design of the baghouses and compliance with the grain loading limitations. Compliance with the grain loading limitations has been demonstrated at similar, but larger, control equipment at this facility.

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.



The tpy emission limitations were developed by multiplying the short-term allowable PE and PM-10 limitations (as appropriate) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.

d. Emission Limitation:

Fugitive PE and PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.59 tpy.

Applicable Compliance Method:

Compliance shall be determined as follows:

$$E = SU \times EF \times (1-CE)$$

where:

E = annual emissions, in tons;

SU = amount of sawdust unloaded per year, in tons;

EF = emission factor of 2 lbs PE/ton sawdust unloaded, taken from RACM Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations; and

CE = control efficiency estimated to be 90% for the telescopic tube and 3-sided enclosure, as determined using RACM Table 2.17-3.

g) Miscellaneous Requirements

- (1) None.





	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.48 tpy. Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average.
b.	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A) OAC rule 3745-17-08(B) OAC rule 3745-17-07(B)	The requirements established pursuant to OAC rules 3745-17-11(B), 3745-17-07(A), 3745-17-08(B) and 3745-17-07(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D)(1)(b).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The pressure drop across the baghouse shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except following rebagging until sufficient filter cake is developed on the bags.
- (2) The facility shall retain the option to install a bag leak detector. Should this option be chosen, the bag leak detector shall be properly installed and calibrated, operated and maintained. An audible alarm shall be installed to sound should emissions above the percent saturation, determined during the calibration testing, be exceeded. The requirement to operate this emissions unit within the pressure drop range of 1 to 5 inches of water shall be vacated under this option.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.



- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the area around the dumpster serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (4) Notwithstanding the frequency of reporting requirements specified in d)(2) and d)(3), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
  - a. for 1 full quarter the facility's visual observations indicate no visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

- (5) Should a bag leak detector be installed and operated as specified in c)(2) the facility shall maintain records of the details of each event where the audible alarm sounds. These records shall include the date, time, duration, cause, and the facility's response to the alarm. These records will normally record instances where an emissions violation was avoided. Should a bag leak detector be installed and operated as specified in c)(2) the facility shall not be required to maintain records specified in d)(1) and d)(2) above.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (2) The permittee shall submit annual 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 Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (3) The permittee shall submit annual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the area around the dumpster serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.



(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Visible particulate emissions from the baghouse shall not exceed 0% opacity as a 6-minute average.

Visible emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and (B)(3), as appropriate.

b. Emission Limitations:

PE shall not exceed 2.51 lbs/hr and 10.98 tpy from the baghouse stack.

PM-10 emissions shall not exceed 1.25 lbs/hr and 5.49 tpy from the baghouse stack.

Applicable Compliance Method:

These limitations are based upon the design of the baghouses and compliance with the grain loading limitations. Compliance with the grain loading limitations has been demonstrated at similar, but larger, control equipment at this facility.

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

The tpy emission limitations were developed by multiplying the short-term allowable PE and PM-10 limitations (as appropriate) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.



c. Emission Limitations:

PE shall not exceed 0.005 grain per dscf from the baghouse stack.

PM-10 shall not exceed 0.0025 grain per dscf from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

d. Emission Limitation:

Fugitive PE and PM-10 emissions from loading into a dumpster shall not exceed 0.48 tpy.

Applicable Compliance Method:

Compliance was demonstrated one time based upon the maximum dust loading as follows:

$$E = 1,907 \text{ tons dust/year} \times 2 \text{ lbs/ton} \times .25 \times 1 \text{ ton}/2000 \text{ lbs} = 0.48 \text{ ton/year}$$

where:

E = estimated emissions in tons per year;

1,907 is the tons of sawdust anticipated to be loaded into trucks per year;

2 lbs/ton is an emission factor taken from RACM, Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations; and

0.25 is an emission factor based upon estimated control efficiency of 75% for loading within a 3-sided enclosure.

g) Miscellaneous Requirements

- (1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P3-P2) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation



of the control equipment will not trigger a request for an application to modify the issued permit be submitted. The updated Emissions Unit Table P3-P2 will be included in the next modification to this permit. If the Emissions Unit Table P3-P2 does not require an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

- (2) The permittee shall submit an updated table of PTI exempt emissions units to the Director (the Ohio EPA, Northeast District Office) on an annual basis for Plant 3. The updated table shall include the complete list of emissions units including any PTI exempt emissions unit(s) installed during the last calendar year and an identification of all emissions unit(s) that is/are permanently shut down and dismantled. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

The updated table of PTI exempt emissions units will be included in the next modification to this permit. If the table of PTI exempt emissions units does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

TABLE P3-P2 FOR EMISSIONS UNIT P002 AT PLANT 3  
EPA Label = P3-20866 Date 1/2009

Equipment	CFM in pipe
Brush Assembly Denniber P4-383 (Primer)	873
Brush Assembly Denniber P4-383 (Primer)	873
Brush Assembly Denniber P4-383 (Primer)	873
Brush Assembly Denniber P4-383 (Primer)	873
Brush Assembly Denniber P4-383 (Primer)	1257
Brush Assembly Denniber P4-383 (Primer)	1257
Down Draft Table P4-384 (Primer)	3491
Sorbini Panel Cleaner P4-385 (Primer)	1257
Sorbini Panel Cleaner P4-385 (Primer)	1257
Sorbini Panel Cleaner P4-385 (Primer)	1257
Sorbini Panel Cleaner P4-385 (Primer)	2234
Sorbini Smart Sand Machine (Primer)	1710
Sorbini Smart Sand Machine (Primer)	1710
Sorbini Smart Sand Machine (Primer)	3491
Down Draft Table P4-394 (Primer)	3491
Down Draft Table P4-395 (Primer)	3491
Brush Assembly Denniber P4-402 (Top Coat)	873
Brush Assembly Denniber P4-402 (Top Coat)	873
Brush Assembly Denniber P4-402 (Top Coat)	873
Brush Assembly Denniber P4-402 (Top Coat)	873
Brush Assembly Denniber P4-402 (Top Coat)	1257
Brush Assembly Denniber P4-402 (Top Coat)	1257
Down Draft Table P4-403 (Top Coat)	3491
Sorbini Panel Cleaner P4-404 (Top Coat)	1257
Sorbini Panel Cleaner P4-404 (Top Coat)	1257
Sorbini Panel Cleaner P4-404 (Top Coat)	1257
Sorbini Panel Cleaner P4-404 (Top Coat)	2234
Brush Assembly Denniber P4-415 (Top Coat)	873
Brush Assembly Denniber P4-415 (Top Coat)	873
Brush Assembly Denniber P4-415 (Top Coat)	873
Brush Assembly Denniber P4-415 (Top Coat)	873



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

Brush Assembly Denniber P4-415 (Top Coat)	1257
Brush Assembly Denniber P4-415 (Top Coat)	1257
Down Draft Table P4-416 (Top Coat)	3491
Panel Cleaner P4-418	1257





	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>and P004, combined, shall not exceed 0.54 tpy.</p> <p>Visible emissions of fugitive dust from the dumpster shall not exceed 10% opacity as a 3-minute average.</p>
b.	<p>OAC rule 3745-17-11(B) OAC rule 3745-17-07(A) OAC rule 3745-17-08(B) OAC rule 3745-17-07(B)</p>	<p>The requirements established pursuant to OAC rules 3745-17-11(B), 3745-17-07(A), 3745-17-08(B) and 3745-17-07(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D)(1)(b).</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The pressure drop across the baghouse shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except following rebagging until sufficient filter cake is developed on the bags.

(2) The facility shall retain the option to install a bag leak detector. Should this option be chosen, the bag leak detector shall be properly installed and calibrated, operated and maintained. An audible alarm shall be installed to sound should emissions above the percent saturation, determined during the calibration testing, be exceeded. The requirement to operate this emissions unit within the pressure drop range of 1 to 5 inches of water shall be vacated under this option.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and



- c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the area around the dumpster serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (4) Notwithstanding the frequency of reporting requirements specified in d)(2) and d)(3), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. for 1 full quarter the facility's visual observations indicate no visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

- (5) Should a bag leak detector be installed and operated as specified in c)(2) the facility shall maintain records of the details of each event where the audible alarm sounds. These records shall include the date, time, duration, cause, and the facility's response to the alarm. These records will normally record instances where an emissions violation was avoided. Should a bag leak detector be installed and operated as specified in c)(2) the facility shall not be required to maintain records specified in d)(1) and d)(2) above.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (2) The permittee shall submit annual 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 Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (3) The permittee shall submit annual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the area around the dumpster serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year.



Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

Visible particulate emissions from the baghouse stack shall not exceed 0% opacity as a 6-minute average.

Visible emissions of fugitive dust from the dumpster shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and (B)(3), as appropriate.

b. Emission Limitations:

PE shall not exceed 1.49 lbs/hr and 6.52 tpy from the baghouse stack.

PM-10 emissions shall not exceed 0.74 lb/hr and 3.26 tpy from the baghouse stack.

Applicable Compliance Method:

These limitations are based upon the design of the baghouses and compliance with the grain loading limitations. Compliance with the grain loading limitations has been demonstrated at similar, but larger, control equipment at this facility.

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

The tpy emission limitations were developed by multiplying the short-term allowable PE and PM-10 limitations (as appropriate) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.



Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.

c. Emission Limitations:

Particulate emissions (PE) shall not exceed 0.005 grain per dscf from the baghouse stack.

Particulate matter less than 10 microns (PM-10) shall not exceed 0.0025 grain per dscf from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

d. Emission Limitation:

Fugitive PE and PM-10 emissions from the dumpster for emissions units P003 and P004, combined, shall not exceed 0.54 tpy.

Applicable Compliance Method:

Compliance was demonstrated one time based upon the maximum dust loading as follows:

$$E = 2,148 \text{ tons dust/year} \times 2 \text{ lbs/ton} \times 0.25 \times 1 \text{ ton}/2000 \text{ lbs} = 0.54 \text{ ton/year}$$

where:

E = estimated emissions in tons per year;

2148 is the tons of sawdust anticipated to be loaded into trucks per year;

2 lbs/ton is an emission factor taken from RACM, Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations; and

0.25 is an emissions factor based upon estimated control efficiency of 75% for loading within a 3-sided enclosure.

g) Miscellaneous Requirements

- (1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P3-P3) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.



After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted. The updated Emissions Unit Table P3-P3 will be included in the next modification to this permit. If the Emissions Unit Table P3-P3 does not require an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

- (2) The permittee shall submit an updated table of PTI exempt emissions units to the Director (the Ohio EPA, Northeast District Office) on an annual basis for Plant 3. The updated table shall include the complete list of emissions units including any PTI exempt emissions unit(s) installed during the last calendar year and an identification of all emissions unit(s) that is/are permanently shut down and dismantled. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

The updated table of PTI exempt emissions units will be included in the next modification to this permit. If the table of PTI exempt emissions units does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

TABLE P3-P3 FOR EMISSIONS UNIT P003 AT PLANT 3  
 EPA Label = P3-12742 Date 1/2009

Equipment	CFM in pipe
Brush Assembly Denniber P4-03 (Primer)	1021
Brush Assembly Denniber P4-03 (Primer)	1021
Brush Assembly Denniber P4-03 (Primer)	1021
Brush Assembly Denniber P4-03 (Primer)	1021
Brush Assembly Denniber P4-03 (Primer)	1021
Brush Assembly Denniber P4-03 (Primer)	1021
Sorbini Panel Cleaner P4-05 (Primer)	1815
Sorbini Panel Cleaner P4-05 (Primer)	1815
Sorbini Panel Cleaner P4-05 (Primer)	1815
Sorbini Panel Cleaner P4-05 (Primer)	1021
Sorbini Smart Sand Machine (Primer)	1390
Sorbini Smart Sand Machine (Primer)	1390
Sorbini Smart Sand Machine (Primer)	2836
Down Draft Table P4-13 (Primer)	1815
Down Draft Table P4-14 (Primer)	1815
Brush Assembly Denniber P4-39 (Top Coat)	1021
Brush Assembly Denniber P4-415 (Top Coat)	1021
Brush Assembly Denniber P4-415 (Top Coat)	1021
Brush Assembly Denniber P4-415 (Top Coat)	1021
Brush Assembly Denniber P4-415 (Top Coat)	1021
Brush Assembly Denniber P4-415 (Top Coat)	1021
Down Draft Table P4-277 (Top Coat)	1815
Sorbini Panel Cleaner P4-23 (Top Coat)	1815
Sorbini Panel Cleaner P4-404 (Top Coat)	1815
Sorbini Panel Cleaner P4-404 (Top Coat)	1815
Sorbini Panel Cleaner P4-404 (Top Coat)	1021



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

DMC Roto Sand Unit P4-33 (Top Coat)	2836
DMC Roto Sand Unit P4-33 (Top Coat)	1815
DMC Roto Sand Unit P4-33 (Top Coat)	1021
Down Draft Table P4-278 (Top Coat)	1815





	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>the dumpster for emissions units P003 and P004, combined, shall not exceed 0.54 tpy.</p> <p>Visible emissions of fugitive dust from the dumpster shall not exceed 10% opacity as a 3-minute average.</p>
b.	<p>OAC rule 3745-17-11(B)            OAC rule 3745-17-07(A)            OAC rule 3745-17-08(B)            OAC rule 3745-17-07(B)</p>	<p>The requirements established pursuant to OAC rules 3745-17-11(B), 3745-17-07(A), 3745-17-08(B) and 3745-17-07(B) are less stringent than the requirements established pursuant to OAC rule 3745-31-05(D)(1)(b).</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The pressure drop across the baghouse shall be maintained within the range of 1 to 5 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except following rebagging until sufficient filter cake is developed on the bags.

(2) The facility shall retain the option to install a bag leak detector. Should this option be chosen, the bag leak detector shall be properly installed and calibrated, operated and maintained. An audible alarm shall be installed to sound should emissions above the percent saturation, determined during the calibration testing, be exceeded. The requirement to operate this emissions unit within the pressure drop range of 1 to 5 inches of water shall be vacated under this option.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

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

a. the color of the emissions;

b. the total duration of any visible emission incident; and



- c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the area around the dumpster serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
  - b. the total duration of any visible emission incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (4) Notwithstanding the frequency of reporting requirements specified in d)(2) and d)(3), the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:
- a. for 1 full quarter the facility's visual observations indicate no visible emissions; and
  - b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to daily readings if any visible emissions are observed.

- (5) Should a bag leak detector be installed and operated as specified in c)(2) the facility shall maintain records of the details of each event where the audible alarm sounds. These records shall include the date, time, duration, cause, and the facility's response to the alarm. These records will normally record instances where an emissions violation was avoided. Should a bag leak detector be installed and operated as specified in c)(2) the facility shall not be required to maintain records specified in d)(1) and d)(2) above.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (2) The permittee shall submit annual 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 Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.
  - (3) The permittee shall submit annual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the area around the dumpster serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) each year in the PER and shall cover the previous year.



Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations:

Visible particulate emissions from the baghouse stack shall not exceed 0% opacity as a 6-minute average.

Visible emissions of fugitive dust from the dumpster shall not exceed 10% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1) and (B)(3), as appropriate.

- b. Emission Limitations:

PE shall not exceed 1.34 lbs/hr and 5.85 tpy from the baghouse stack.

PM-10 emissions shall not exceed 0.67 lb/hr and 2.92 tpy from the baghouse stack.

Applicable Compliance Method:

These limitations are based upon the design of the baghouses and compliance with the grain loading limitations. Compliance with the grain loading limitations has been demonstrated at similar, but larger, control equipment at this facility.

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

The tpy emission limitations were developed by multiplying the short-term allowable PE and PM-10 limitations (as appropriate) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.



Therefore, if compliance is shown with the short-term allowable emission limitations, compliance shall also be shown with the annual emission limitations.

c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.005 grain per dscf from the baghouse stack.

Particulate matter less than 10 microns (PM-10) shall not exceed 0.0025 grain per dscf from the baghouse stack.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 for PE and 40 CFR Part 51, Appendix M, Method 201 for PM-10.

d. Emission Limitation:

Fugitive PE and PM-10 emissions from the dumpster for emissions units P003 and P004, combined, shall not exceed 0.54 tpy.

Applicable Compliance Method:

Compliance was demonstrated one time based upon the maximum dust loading as follows:

$$E = 2,148 \text{ tons dust/year} \times 2 \text{ lbs/ton} \times 0.25 \times 1 \text{ ton}/2000 \text{ lbs} = 0.54 \text{ ton/year}$$

where:

E = estimated emissions in tons per year;

2,148 is the tons of sawdust anticipated to be loaded into trucks per year;

2 lbs/ton is an emission factor taken from RACM, Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations; and

0.25 is an emissions factor based upon estimated control efficiency of 75% for loading within a 3-sided enclosure.

g) Miscellaneous Requirements

- (1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P3-P4) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report



shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted. The updated Emissions Unit Table P3-P4 will be included in the next modification to this permit. If the Emissions Unit Table P3-P4 does not require an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

- (2) The permittee shall submit an updated table of PTI exempt emissions units to the Director (the Ohio EPA, Northeast District Office) on an annual basis for Plant 3. The updated table shall include the complete list of emissions units including any PTI exempt emissions unit(s) installed during the last calendar year and an identification of all emissions unit(s) that is/are permanently shut down and dismantled. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

The updated table of PTI exempt emissions units will be included in the next modification to this permit. If the table of PTI exempt emissions units does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

TABLE P3-P4 FOR EMISSIONS UNIT P004 AT PLANT 3  
EPA Label = P3-12743 Date 1/2009

Equipment	CFM in pipe
Brush Assembly Denniber P4-136 (Primer)	1021
Brush Assembly Denniber P4-136 (Primer)	1021
Brush Assembly Denniber P4-136 (Primer)	1021
Brush Assembly Denniber P4-136 (Primer)	1021
Brush Assembly Denniber P4-136 (Primer)	1021
Brush Assembly Denniber P4-136 (Primer)	1021
Sorbini Panel Cleaner P4-141 (Primer)	454
Sorbini Panel Cleaner P4-141 (Primer)	1021
Sorbini Panel Cleaner P4-141 (Primer)	1021
Sorbini Panel Cleaner P4-141 (Primer)	1021
Sorbini Smart Sand Machine (Primer)	1390
Sorbini Smart Sand Machine (Primer)	1390
Sorbini Smart Sand Machine (Primer)	2836
Down Draft Table P4-149 (Primer)	1815
Down Draft Table P4-150 (Primer)	1815
Brush Assembly Denniber P4-179 (Top Coat)	1021
Brush Assembly Denniber P4-179 (Top Coat)	1021
Brush Assembly Denniber P4-179 (Top Coat)	1021
Brush Assembly Denniber P4-179 (Top Coat)	1021
Brush Assembly Denniber P4-179 (Top Coat)	1021
Brush Assembly Denniber P4-179 (Top Coat)	1021
Down Draft Table P4-180 (Top Coat)	1815
Sorbini Panel Cleaner P4-181 (Top Coat)	454



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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

**Permit Number:** P0104093

**Facility ID:** 0204000360

**Effective Date:** 5/15/2009

Sorbini Panel Cleaner P4-181 (Top Coat)	1021
Sorbini Panel Cleaner P4-181 (Top Coat)	1021
Sorbini Panel Cleaner P4-181 (Top Coat)	1021
DMC Roto Sand Unit P4-135 (Top Coat)	1815
DMC Roto Sand Unit P4-135 (Top Coat)	1815
DMC Roto Sand Unit P4-135 (Top Coat)	2836
Down Draft Table P4-188 (Top Coat)	1815