State of Ohio Environmental Protection Agency

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Certified Mail

5/18/2009

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

Mr. Tim More
MASCO Retail Cabinet Group, LLC (KraftMaid Plant 2)
15535 S STATE AVE
P.O Box 1055
Middlefield, OH 44062

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0228000213
Permit Number: P0104097
Permit Type: Renewal
County: Geauga

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, 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.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NEDO

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 2)

Facility ID: 0228000213
Permit Number: P0104097
Permit Type: Renewal
Issued: 5/18/2009
Effective: 5/18/2009
Expiration: 5/18/2014

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 2)

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Authorization

Facility ID: 0228000213
Application Number(s): A0036266
Permit Number: P0104097
Permit Description: First FEPTIO for these emissions units to modify emissions units F002, F004, P017 and P018, which are currently permited in a PTI.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 5/18/2009
Effective Date: 5/18/2009
Expiration Date: 5/18/2014
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 2)
15535 S STATE AVE
MIDDLEFIELD, OH 44062

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: P0104097
Permit Description: First FEPTIO for these emissions units to modify emissions units F002, F004, P017 and P018, which are currently permited in a PTI.

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

Emissions Unit ID:	**F002**
Company Equipment ID:	P2-10908
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Sawdust Storage Silo
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P017**
Company Equipment ID:	P2-10921
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	P2-10907
Superseded Permit Number:	
General Permit Category and Type:	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 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

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

Table P2-F2	F002 – Paper bailer which is vented to Product Collector Cyclone P2-10908
Table P2-F4	F004 – Sawdust storage silo which is vented to Baghouse P2-10913
Table P2-P17	P017 - Emission Units which are vented to Baghouse P2-10921
Table P2-P18	P018 – Emission Units which are vented to Baghouse P2-10907

C. Emissions Unit Terms and Conditions

1. F002, P2-10908

Operations, Property and/or Equipment Description:

11,500 cfm Paper Bailer with product collector cyclone, P2-10908

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), e)(1), e)(2) 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) and particulate matter less than 10 microns (PM-10) from the product collector cyclone shall not exceed 5.0 tpy. Visible emissions of fugitive dust from the cyclone shall not exceed 10% opacity as a 3-minute average.
b.	OAC rule 3745-17-08(B) OAC rule 3745-17-07(B)	The requirements established pursuant to OAC rules 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) 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 emissions of fugitive dust from the product collector cyclone stack. 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) 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 emissions of fugitive dust were observed from the cyclone 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.

(2) 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 Limitation:

Visible emissions of fugitive dust from the cyclone 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)(3)**.**

b. Emission Limitation:

PE and PM-10 from the product collector cyclone shall not exceed 5.0 tpy.

Applicable Compliance Method:

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

E = 100 tons per year x 0.05

where:

E = emissions in tons per year PE and PM10;

100 tons per year = the maximum anticipated throughput; and

0.05 = the estimated factor for uncollected particles from the bailer. The paper to be bailed is all large chunks with no small paper particles into the bailer.

g) Miscellaneous Requirements

(1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P2-F2) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to the cyclone. 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 P2-F2 will be included in the next modification to this permit. If the Emissions Unit Table P2-F2 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 2. 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 P2-F2 FOR EMISSIONS UNIT F002 AT PLANT 2
EPA Label = P2-10908 Date 1/2009

Equipment	CFM in pipe
Brush Cleaner	2673
Brush Cleaner	962
Brush Cleaner	962
Brush Cleaner	962
Floor Sweep	1710

2. F004, Sawdust Storage Silo

Operations, Property and/or Equipment Description:

Storage Silo with 1680 cfm return air baghouse, P2-10913 and baghouse P2-10920 for 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 0.07 lb/hr and 0.32 tpy from the baghouse P2-10913 exhaust. PM-10 emissions from loading sawdust into the storage silo shall not exceed 0.04 lb/hr and 0.16 tpy from the baghouse P2-10913 exhaust. PE from loading sawdust into trucks from the storage silo shall not exceed 0.54

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		lb/hr and 2.35 tpy from the baghouse P2-10920 exhaust. PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.27 lb/hr and 1.17 tpy from the baghouse P2-10920 exhaust. Visible particulate emissions from each baghouse shall not exceed 0% opacity as a 6-minute average. Fugitive PE and PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 6.32 tpy. Visible emissions of fugitive dust from loading sawdust into trucks from the storage silo 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) 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 0.07 lb/hr and 0.32 tpy from the baghouse P2-10913 exhaust.

PM-10 emissions from loading sawdust into the storage silo shall not exceed 0.04 lb/hr and 0.16 tpy from the baghouse P2-10913 exhaust.

PE from loading sawdust into trucks from the storage silo shall not exceed 0.54 lb/hr and 2.35 tpy from the baghouse P2-10920 exhaust.

PM-10 emissions from loading sawdust into trucks from the storage silo shall not exceed 0.27 lb/hr and 1.17 tpy from the baghouse P2-10920 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 6.32 tpy.

Applicable Compliance Method:

Compliance shall be determined as follows:

E = SU x EF x (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 Table2.17-1, 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) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P2-F4) 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 P2-F4 will be included in the next modification to this permit. If the Emissions Unit Table P2-F4 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 2. 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 P2-F4 FOR EMISSIONS UNIT F004 AT PLANT 2
EPA Label = P2-10913 Date 1/2009

Equipment	CFM in pipe
Storage Silo	1680

3. P017, P2-10921

Operations, Property and/or Equipment Description:

Woodworking equipment with 12,500 cfm Baghouse P2-10921

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), c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), d)(5), e)(1), e)(2), e)(3), e)(4) 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 the baghouse stack. Particulate matter less than 10 microns (PM-10) shall not exceed 0.0025 grain per dscf from the baghouse stack. PE shall not exceed 0.54 lb/hr and 2.35 tpy from the baghouse stack. PM-10 emissions shall not exceed 0.27 lb/hr and 1.17 tpy from the baghouse stack. Visible particulate emissions from the baghouse stack shall not exceed 0% opacity as a 6-minute average. Fugitive PE and PM-10 emissions from dumpster operations shall not exceed

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.43 tpy. Visible emissions of fugitive dust from the dumpster area 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 stack shall not exceed 0% opacity as a 6-minute average.

Visible emissions of fugitive dust from the dumpster area 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 Limitation:

PE shall not exceed 0.54 lb/hr and 2.35 tpy from the baghouse stack.

PM-10 emissions shall not exceed 0.27 lb/hr and 1.17 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 dumpster operations shall not exceed 0.43 tpy.

Applicable Compliance Method:

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

E = 1,711 tons dust/year x 2 lbs/ton x .25 x 1 ton/2000 lbs = 0.43 ton/year

where:

E = estimated emissions in tons per year;

1,711 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 P2-P17) 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 P2-P17 will be included in the next modification to this permit. If the Emissions Unit Table P2-P17 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 2. 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.

(3) 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 P2-P17 FOR EMISSIONS UNIT P017 AT PLANT 2
EPA Label = P2-10921 Date 1/2009

Equipment	CFM in pipe
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	382
Molding Line Sta #1, 2, 3	859
Molding Line Sta #4 Toner Booth	4677
Molding Line Sta #4 Toner Booth	4677
Molding Line Sta #5 Oven	4677
Molding Line Sta #6 Stain Booth	4677
Molding Line Sta #6 Stain Booth	4677
Molding Line Sta #7	597
Molding Line Sta #7	597
Molding Line Sta #7	597
Molding Line Sta #7	597
Molding Line Topcoat Booth	2386
Molding Line Sta #9, 10, 11	382
Molding Line Sta #9,10, 11	382
Molding Line Sta #9, 10, 11	382
Molding Line Sta #9, 10, 11	382
Molding Line Sta #9, 10, 11	382
Molding Line Sta #12 Sealer Booth	2386
Molding Line Sta #13 UV	2386
Molding Line Sta #14, 15, 16	382
Molding Line Sta #14, 15, 16	382
Molding Line Sta #14, 15, 16	382
Molding Line Sta #14, 15, 16	382
Molding Line Sta #14, 15, 16	382
Molding Line Sta #14,15, 16	382
Molding Line Sta #14, 15, 16	382

Molding Line Sta #14, 15, 16	859
Molding Line Sta #17	597
Molding Line Sta #17	2386
Molding Line Sta #20-21	2386

4. P018, P2-10907

Operations, Property and/or Equipment Description:

Woodworking equipment with 8,500 cfm Baghouse P2-10907

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), c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), d)(5), e)(1), e)(2), e)(3), e)(4) 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 the baghouse stack. Particulate matter less than 10 microns (PM-10) shall not exceed 0.0025 grain per dscf from the baghouse stack. PE shall not exceed 0.36 lb/hr and 1.60 tpy from the baghouse stack. PM-10 emissions shall not exceed 0.18 lb/hr and 0.80 tpy from the baghouse stack. Visible particulate emissions from the baghouse stack shall not exceed 0% opacity as a 6-minute average. Fugitive PE and PM-10 emissions from loading into a dumpster shall not exceed

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.12 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 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 0.36 lb/hr and 1.60 tpy from the baghouse stack.

PM-10 emissions shall not exceed 0.18 lb/hr and 0.80 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 loading into a dumpster shall not exceed 0.12 tpy.

Applicable Compliance Method:

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

E = 1,164 tons dust/year x 2 lbs/ton x .10 x 1 ton/2000 lbs = 0.12 ton/year

where:

E = estimated emissions in tons per year;

1,164 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

0.10 is an emissions factor based upon estimated control efficiency of 90% for loading with a telescopic chute within a 3-sided enclosure.

g) Miscellaneous Requirements

(1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P2-P18) 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 P2-P18 will be included in the next modification to this permit. If the Emissions Unit Table P2-P18 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 2. 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 P2-P18 FOR EMISSIONS UNIT P018 AT PLANT 2
EPA Label = P2-10907 Date 1/2009

Equipment	CFM in pipe
Prototype Shop	
Weeke BP-12	1169
Belt Sander	382
Band Saw	382
Spindle Sander/Planer	382
10” Delta Table Saw	382
Whirlwind Sander	597
5-Speed Shaper	1169
5-Speed Shaper	1169
Table Saw/F-45	859
Time Saver	1527
Time Saver	1527
Time Saver	1527
Top Shop	
Hitachi Cut-Off Saw	215
Dewalt Cut-Off Saw	54
Table Saw/F-45	597
Table Saw/F-46	215