



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

8/28/2009

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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 #1)
16052 Industrial Parkway
P.O. Box 1055
Middlefield, OH 44062

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0228000186
Permit Number: P0104607
Permit Type: Initial Installation
County: Geauga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; Canada



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104607
Facility ID: 0228000186

Permit Strategy Write-Up

P0104607 for MASCO Retail Cabinet Group, LLC (KraftMaid Plant 1)

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility is located at 16052 Industrial Parkway in Middlefield, Geauga County, Ohio. The facility manufactures wooden cabinets and operates under SIC 2434.

3. Facility Emissions and Attainment Status:

The facility is currently operating under a synthetic minor permit to avoid Title V permitting. Geauga County is classified as attainment for PM-2.5. The State of Ohio currently regulates PM-10 emissions as a surrogate for PM-2.5.

4. Source Emissions:

This permit is for the installation of new emissions unit P015, which will replace emissions unit P013. The emissions are generated by various woodworking equipment which vent into the baghouse and which exhaust is released through the baghouse stack. MASCO has proposed a BAT determination of 0.0025 grain PM-10 per dscf of exhaust from the baghouse to restrict the facility to less than 100 tpy. Fugitive emissions are generated from loading out of the shared sawdust hopper (shared with emissions units P009, P010, P014 and P015) and into trucks.

The allowable stack emissions are 2.92 tpy PM-10. The combined allowable PM-10 stack emissions from Plant 1 and Plant 2 will be 70.97 tpy after this permit is issued.

The allowable fugitive emissions, which are generated from loading sawdust into trucks, are 5.76 tpy.

5. Conclusion:

This facility will remain a synthetic minor facility after the installation of emissions unit P015.

6. Please provide additional notes or comments as necessary:

None



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104607
Facility ID: 0228000186

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM-10 (stack)	2.92
PE/PM-10 (fugitive) combined limit for emissions units P009, P010, P014 and P015	5.76

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
MASCO Retail Cabinet Group, LLC (KraftMaid - Plant #1)

Issue Date: 8/28/2009
Permit Number: P0104607
Permit Type: Initial Installation
Permit Description: New emissions unit P015.
Facility ID: 0228000186
Facility Location: MASCO Retail Cabinet Group, LLC (KraftMaid - Plant #1)
16052 INDUSTRIAL PKWY,
Middlefield, OH 44062
Facility Description: Wood Kitchen Cabinet and Countertop Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Bridget Byrne at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
MASCO Retail Cabinet Group, LLC (KraftMaid - Plant #1)

Facility ID: 0228000186
Permit Number: P0104607
Permit Type: Initial Installation
Issued: 8/28/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



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 #1)

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0228000186
Application Number(s): A0037174
Permit Number: P0104607
Permit Description: New emissions unit P015.
Permit Type: Initial Installation
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 8/28/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

MASCO Retail Cabinet Group, LLC (KraftMaid - Plant #1)
16052 INDUSTRIAL PKWY
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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104607

Permit Description: New emissions unit P015.

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

Emissions Unit ID:	P015
Company Equipment ID:	P1-25795
Superseded Permit Number:	P0104445
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

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

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104607

Facility ID: 0228000186

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P015, P1-25795

Operations, Property and/or Equipment Description:

new 31,150 cfm baghouse and truck loading replaces emissions unit P013

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. 1.b)(1), 1.c)(1) and (2), 1.d)(1)-(5), 1.e)(1)-(4) and 1.f)(1) and (2).

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)	0.005 grain particulate emissions (PE) per dscf and 0.0025 grain particulate matter less than 10 microns (PM-10) per dscf from the baghouse stack 1.34 lbs PE/hour and 5.85 tons per year from the baghouse stack 0.67 lb PM-10 per hour and 2.92 tons per year from the baghouse stack 0% visible emissions from the baghouse stack, as a six-minute average Combined fugitive PE and PM-10 emissions from P009, P010, P014 and P015 shall not exceed 5.76 tons per year from truck loading. 10% visible fugitive emissions, as a three-minute average



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)(1) 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)(1), 3745-17-08(B) and 3745-17-07(B) are less restrictive 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, 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.
- c. 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 including 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) 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.
- (3) 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.
- (4) 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.

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 Limitation:

0% visible emissions from the baghouse stack, as a six-minute average and 10% visible fugitive emissions, as a three-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

1.34 lbs PE/hour and 5.85 tons per year from the baghouse stack

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon the emission test requirements specified in f)(2).

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (1.34 lbs/hr) 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 limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

0.67 lb PM-10 per hour and 2.92 tons per year from the baghouse stack

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be demonstrated based upon the emission test requirements specified in f)(2).

The tpy emission limitation was developed by multiplying the short-term allowable PM-10 emission limitation (0.67 lb/hr) 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 limitation, compliance shall also be shown with the annual emission limitation.



d. Emission Limitation:

0.005 grain PE/dscf and 0.0025 grain PM-10/dscf from baghouse exhaust

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission test requirements specified in f)(2).

e. Emission Limitation:

Combined fugitive PE and PM-10 emissions from P009, P010, P014 and P015 shall not exceed 5.76 tons per year from truck loading.

Applicable Compliance Method:

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

$$E = 23,041 \text{ tons dust/year} \times 2 \text{ lbs/ton} \times 0.25 \times 1 \text{ ton}/2000 \text{ lbs} = 5.76 \text{ tons/year}$$

where:

E = estimated emissions, in tons per year;

23,041 = the tons of sawdust anticipated to be loaded into trucks per year;

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

0.25 = the emission factor based upon the estimated 75% control efficiency for the three sided enclosure for loading trucks.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Emissions testing shall be completed within one year of installation and startup. After the initial emissions testing is completed, the permittee shall retest the emissions unit every 5 years.

b. The emission testing shall be conducted to demonstrate compliance with 0.005 grain PE per dscf and 0.0025 grain PM-10 per dscf and with the hourly mass emission limitations specified in b)(1)a.

c. The following test methods shall be employed to demonstrate compliance with the allowable emission rates:

for PE – 40 CFR Part 60, Appendix A, Methods 1 through 5; and
for PM-10 – 40 CFR Part 51, Appendix M, Method 201.

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



- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

g) **Miscellaneous Requirements**

- (1) The permittee shall submit updated Emissions Unit Table for this emissions unit (Table P1-P15) 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 P1-P15 will be included in the next modification to this permit. If the Emissions Unit Table P1-P15 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 1. 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 P1-P15 FOR EMISSIONS UNIT P015 AT PLANT 1

EPA Label = P1-25795

Date 1/2009

Equipment	CFM in pipe
Router -4 Head Heian	401
Router -4 Head Heian	401
Router -4 Head Heian	401
Router -4 Head Heian	627
Router -Single Head Heian	401
Router -Single Head Heian	627
Unisaw P1-75	627
Flute Cutting Machine	903
Shaper	627
Koch Borer	627
Northfield Radial Arm Saw	401
Dato Saw P1-092	627
Power Matic Table Saw	627
Whirlwind Saw	401
Kreg Single Spindle Pocket Borer	401
Kreg Single Spindle Pocket Borer	401
Evan Double Spindle Borer	401
Power Matic Table Saw	627
Table Saw	0
Koch Borer	226
Koch Borer	401
Koch Borer	401
Weeke BHC 360	1606