



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01307

Fac ID: 0125042062

DATE: 9/29/2005

Columbus Wood Products LLC
Jay Minor
1800 East Fifth Avenue
Columbus, OH 432192582

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/29/2005
Effective Date: 9/29/2005**

FINAL PERMIT TO INSTALL 01-01307

Application Number: 01-01307
Facility ID: 0125042062
Permit Fee: **\$1800**
Name of Facility: Columbus Wood Products LLC
Person to Contact: Jay Minor
Address: 1800 East Fifth Avenue
Columbus, OH 432192582

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1800 East Fifth Avenue
Columbus, Ohio**

Description of proposed emissions unit(s):
Wood working operation vented to baghouse, 2 spray booths and 2 flat line spray machines

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

Emissions Unit ID: **P001**

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	6.1
OC	23.0

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P001 - Wood-working operation vented to 2 pneumafil baghouses	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(B)
	OAC rule 3745-17-08(B)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)(1)
OAC rule 3745-31-05(A)(3)	

Applicable Emissions
Limitations/Control
Measures

Particulate emissions (PE) from the bag house stacks shall not exceed 2.9 pounds per hour and 2.9 tons per year.

See sections A.2.a, A2.b and B.1, below.

There shall be no visible PE from the fabric filter stack serving this emissions unit.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Fugitive PE during load out of baghouse dust

shall not exceed 3.2 tons/year.

There shall be no visible PE during loadout except for 1 minute during any 60-minute period.

The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.

See Sections A.2.c below.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** The 2.9 lbs PE/hr and 2.9 tons PE/yr limitations from the bag house stacks for this emissions unit were established to reflect the maximum potential to emit. Therefore, no additional monitoring, recordkeeping and/or reporting other than the parametric monitoring of the baghouse is necessary to ensure compliance with these limits.
- 2.b** The permittee shall operate and maintain the dust collection system and vent emissions to the bag houses according to manufacturer's specifications to maximize capture efficiency and control capabilities.
- 2.c** The permittee shall transfer baghouse dust within an enclosure. The transfer shall be adequately enclosed so as to eliminate visible emissions of fugitive dust at all times. Any visible emissions of dust emanating during transfer shall be cause for the immediate halt of the unloading process until the situation is corrected.

B. 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.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop across the bag house on a daily basis.
- 2. The permittee shall perform weekly checks during the baghouse dust truck load-out operation, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive PE. No inspections are required on days the material handling operations are not in operation. The presence or absence of any visible emissions shall be noted in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:
 - a. whether the emissions are representative of normal operations;

Emissions Unit ID: **P001**

- b. if the emissions are not representative of normal operations, the cause of the visible emissions;
- c. the total duration of any visible emission incident; and
- d. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each truck loading serving this emissions unit.

D. Reporting Requirements

1. In accordance with paragraph A.2.b of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify all time periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semi-annual deviation (excursion) reports which note the following:
 - a. identify all days during which any abnormal visible fugitive PE were observed from the transfer operation serving the baghouse dust collector;
 - b. describe any corrective actions taken to eliminate the abnormal visible fugitive PE;
 - c. identify all days during which any visible PE were observed from any fabric filter stack serving this emissions unit; and
 - d. describe any corrective actions taken to eliminate the visible PE.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under Section A.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
PE from the baghouse stacks shall not exceed 2.9 lbs/hr.

Applicable Compliance Method:

The hourly PE emission rate may be determined by calculation derived from an estimated 1.6 tons of wood waste generated per hour multiplied times a 92% capture efficiency multiplied by the bag house design control efficiency of 99.9%, as follows: $1.6 \text{ tons} * 2,000 \text{ lbs/ton} * 0.92 \text{ capture} * (1 - 0.999)$ equal 2.94 lbs.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10)

- b. Emission Limitation:
PE from the baghouse stacks shall not exceed 2.9 tons/yr.

Applicable Compliance Method:

The annual PE emission rate may be determined by calculation derived from an estimated 3,200 tons of wood waste generated per year multiplied times a 92% capture efficiency multiplied by the bag house design control efficiency of 99.9% , as follows: $3,200 \text{ tons} * 0.92 \text{ capture} * (1 - 0.999)$ equal 2.94 tons.

- c. Emission Limitation:
There shall be no visible particulate emissions from the fabric filter stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the operation identified above shall be determined in accordance with Test Method 22 set forth in "Appendix on Test methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997.

- d. Emission Limitation:
Fugitive PE during load out of baghouse dust shall not exceed 3.2 tons/year.

Applicable Compliance Method:

The annual PE emission rate may be determined by calculation derived from an estimated 3,200 tons of wood waste generated per year multiplied times a 99.9% capture efficiency, as follows: $3,200 \text{ tons} * (1 - 0.999)$ equal 3.2 tons.

- e. Emission Limitation:

Column

PTI A

Issued: 9/29/2005

Emissions Unit ID: **P001**

There shall be no visible PE during dust load out except for 1 minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible emission limitation for the operation identified above shall be determined in accordance with Test Method 22 set forth in "Appendix on Test methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such appendix existed on July 1, 1997.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Spray booth 1 for wood products vented to filter	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year, for all coatings and cleanup materials.
	OAC rule 3745-21-07(G)(2)	See sections A.2.a, B.1 and B.2 below. The emission limitation specified in this rule is less stringent than, or equal in stringency to, the emissions limitation established pursuant to 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

B. Operational Restrictions

1. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.

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Emissions Unit ID: R001

2. The permittee shall maintain a minimum stack height of 32 feet above ground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and clean up material employed;
 - b. the number of gallons of each coating and clean up material employed;
 - c. the organic compound content of each coating and clean up material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and clean up materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and clean up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl acetate
TLV (mg/m3): 950

Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 416

MAGLC (ug/m3): 22,631

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new

Emissions Unit ID: **R001**

pollutants emitted, change in stack/exhaust parameters, etc.);

- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA, CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event occurs.
3. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the total OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.1.

- b. Emission Limitation:
OC emissions shall not exceed 7.3 tons per year, for all coatings and cleanup materials.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon a summation of the records required by C.1(d).

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Spray booth 2 for wood products vented to filter	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year for all coatings and cleanup materials.
	OAC rule 3745-21-07(G)(2)	See sections A.2.a, B.1 and B.2 below. The emission limitation specified in this rule is less stringent than, or equal in stringency to, the emissions limitation established pursuant to 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

B. Operational Restrictions

1. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.

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Issue

Facility ID: 0125042062

Emissions Unit ID: R002

2. The permittee shall maintain a minimum stack height of 32 feet above ground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and clean up material employed;
 - b. the number of gallons of each coating and clean up material employed;
 - c. the organic compound content of each coating and clean up material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and clean up materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and clean up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl acetate
TLV (mg/m3): 950

Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 416

MAGLC (ug/m3): 22,631

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new

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pollutants emitted, change in stack/exhaust parameters, etc.);

- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA, CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event occurs.
3. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the individual HAP, total HAPs and OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.1.

- b. Emission Limitation:
OC emissions shall not exceed 7.3 tons per year, for all coatings and cleanup materials.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon a summation of the records required by C.1(d).

F. Miscellaneous Requirements

None

Column

PTI A

Issued: 9/29/2005

Emissions Unit ID: R003

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Flat-line spray system with 6 guns in enclosure vented to filter	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year for all coatings and cleanup materials .
	OAC rule 3745-21-07(G)(2)	See sections A.2.a, B.1 and B.2 below. The emission limitation specified in this rule is less stringent than, or equal in stringency to, the emissions limitation established pursuant to 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

B. Operational Restrictions

1. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.

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2. The permittee shall maintain a minimum stack height of 16 feet above ground as measured from the ground to the top of the stack for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and clean up material employed;
 - b. the number of gallons of each coating and clean up material employed;
 - c. the organic compound content of each coating and clean up material, in pounds per gallon;
 - d. the total organic compound emission rate for all coatings and clean up materials, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly organic compound emission rate for all coatings and clean up materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: butyl acetate
TLV (mg/m3): 950

Maximum Hourly Emission Rate (lbs/hr): 2.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 416

MAGLC (ug/m3): 22,631

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. A description of the parameters changed (composition of materials, new

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pollutants emitted, change in stack/exhaust parameters, etc.);

- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Ohio EPA, CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event occurs.
3. The permittee shall submit annual reports to the Ohio EPA, CDO which summarizes the OC emitted from the facility. This annual report shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report..

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon record keeping requirements in section C.1.

- b. Emission Limitation:
OC emissions shall not exceed 7.3 tons per year, for all coatings and cleanup materials.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon a summation of the records required by C.1(d).

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R004 - Flat-line spray system with 3 guns for water base primer vented to filter	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.25 lb/hr and 1.1 ton OC/yr.
	OAC rule 3745-21-07(G)(2)	See section A.2.a below. See section A.2.b below.

2. Additional Terms and Conditions

- 2.a Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.
- 2.b This emissions unit does not currently employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This emissions unit is exempt from the emission limitations/control requirements specified in OAC rule 3745-21-07(G)(2) on any day during which only non-photochemically reactive materials are employed.

B. Operational Restrictions

1. The permittee shall vent all emissions from coating operation to the dry filtration

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system, whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

- a. the company identification for each coating employed;
- b. the number of gallons of each coating employed;
- c. the organic compound content of each coating, in pounds per gallon;
- d. the total organic compound emission rate for all coatings, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the CDO within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:
OC emissions shall not exceed 0.25 lb/hr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon calculation at maximum solvent content of 0.5 lb OC/gallon of coating multiplied by the maximum hourly coating application rate of 0.5 gallon equals 0.25 lb

OC/hr.

- b. Emission Limitation:
OC emissions shall not exceed 1.1 ton/yr.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in section C.1.

F. Miscellaneous Requirements

None