

Facility ID: 0238000178 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0238000178 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
sawdust silow unloading controlled by a fabric tube	OAC rule 3745-31-05(A)(3) (PTI 02-18223 Effective 7/10/2003)	See A.2.a, A.2.b and B.1 below.
	OAC rule 3745-17-07(B)	Exempt due to location in a non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.

2. **Additional Terms and Conditions**
 - (a) Particulate emissions (PE) shall not exceed 12.3 pounds per hour and 3.4 tons per year. Visible fugitive emissions shall not exceed 20% opacity, as a 3-minute average.

B. Operational Restrictions

1. Fugitive emissions from the wood waste storage silo load-out shall be reduced by using a fabric tube to reduce drop height.
2. The design of the fabric tube shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. The fabric tube shall be maintained in good operating condition. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage bin load-out in excess of 20% opacity, as a 3-minute average.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall record any load-out when the fabric tube was not used, and the corrective measures taken to eliminate future instances.
2. The permittee shall maintain an operations log with the date of each load-out, the duration in hours or each load-out, and tons of wood waste loaded-out from the wood waste storage bin.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the fabric tube was not in service during wood waste load-out. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall submit annual reports that summarize the following information:
 - a. the total mass of wood waste load-out, in tons per year;
 - b. the total PE for the wood waste loaded-out, calculated according to E.2; and
 - c. the PE emissions limit specified above.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Fugitive particulate emissions shall not exceed 12.3 pounds per hour.

Applicable Compliance Method:
Compliance with the particulate emission limitation shall be determined by multiplying the material loaded out by

the emission factor and the control efficiency of the fabric tube according to the following equation:

$$\text{lbs/hr} = (\text{tons wood waste load-out/hr}) \times (2.0 \text{ lbs/ton}) \times (1-0.75)$$

where:

2.0 lbs PE/ton is the emission factor for wood waste storage bin load-out from Ohio EPA's guideline entitled "Reasonably Available Control Measures for Fugitive Dust Sources."

0.75 represents the control efficiency of the fabric tube of 75% from Ohio EPA's guidelines entitled "Reasonably Available Control Measures for Fugitive Dust Sources."

Emission Limitation:

Fugitive particulate emissions shall not exceed 3.4 tons per year.

Applicable Compliance Method:

Compliance with the particulate emission limitation shall be determined by multiplying the material loaded out by the emission factor and the control efficiency of the fabric tube according to the following equation:

$$\text{lbs/hr} = (\text{tons wood waste load-out/year}) \times (2.0 \text{ lbs/ton}) \times (1-0.75) / (\text{ton}/2000 \text{ lbs})$$

where:

2.0 lbs PE/ton is the emission factor for wood waste storage bin load-out from Ohio EPA's guideline entitled "Reasonably Available Control Measures for Fugitive Dust Sources."

0.75 represents the control efficiency of the fabric tube of 75% from Ohio EPA's guidelines entitled "Reasonably Available Control Measures for Fugitive Dust Sources."

Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible fugitive emissions limitation shall be determined by OAC rule 3745-17-03 (B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. None

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
woodworking shop and a wood waste storage bin vent controlled by a 48,000 cfm baghouse, vented inside or outside	OAC rule 3745-31-05(A)(3) (PTI 02-18223 Effective 7/10/2003)	0.01 gr per dscf of exhaust gas, 4.1 pounds per hour and 18.0 tons per year of particulate emissions from the dust collector exhaust.
	OAC rule 3748-17-07(B)	See A.2.a below.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Exempt due to location in non-Appendix A area.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	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**

- (a) There shall be no visible particulate emissions from the dust collector exhaust.
- B. Operational Restrictions**
1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or with the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.
 2. The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
 3. The waste wood storage silo vent shall be controlled by the cyclone and baghouse at all times the woodworking shop is in operation.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).
Whenever the monitored value for the pressure drop deviates from the limit or range specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

 - f. a description of the corrective action;
 - g. the date corrective action was completed;
 - h. the date and time the deviation ended;
 - i. the total period of time (in minutes) during which there was a deviation;
 - j. the pressure drop readings immediately after the corrective action was implemented; and
 - k. the name(s) of the personnel who performed the work.
 2. The permittee shall perform weekly checks, when the emissions unit is in operation and vented outside 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

NOTE: The exhaust from the dust collector for this emissions units is currently vented back into the building. This is the normal operating mode for this emissions unit.
- D. Reporting Requirements**
1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit(s):
 - a. each period of time when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).
 2. The permittee shall submit quarterly 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 minimize or eliminate the visible particulate emissions.

3. These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Particulate emissions shall not exceed 0.01 gr/dscf and 4.1 pounds per hour.

Applicable Compliance Methods:

If required compliance shall be determined according to OAC rule 3745-17-03(B)(10), Method 5, 40 CFR 60, Appendix A).

Emission Limitation:

Particulate emissions shall not exceed 18.0 tons per year.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the following equation:

$(0.055 \text{ gr/dscf}) \times (48,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hrs/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-0.999)$

where:

0.055 gr/dscf is the emission factor from AP-42, table 10.4-1 versions 7/78;

48,000 cfm is the dust collector flow rate; and

99.9% is the dust collector manufacturer's certified control efficiency.

Emission Limitation:

No visible emissions from the dust collector exhaust.

Applicable Compliance Methods:

Compliance with this limitation shall be determined using Test-Method 22-like visible emissions observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation techniques of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emissions observations.)

F. Miscellaneous Requirements

1. None