State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
ASHTABULA COUNTY

Street Address: 50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 02-20472
Fac ID: 0204000360
DATE: 4/12/2007

Kraftmaid Cabinetry, Plant 3
Bennett Wetzel
15535 South State St.
Middlefield, OH 44062-1055

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 4/12/2007**
Terms and Conditions **Effective Date: 4/12/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-20472

Application Number:	02-20472
Facility ID:	0204000360
Permit Fee:	**$300**
Name of Facility:	Kraftmaid Cabinetry, Plant 3
Person to Contact:	Bennett Wetzel
Address:	15535 South State St. Middlefield, OH 44062-1055

Location of proposed air contaminant source(s) [emissions unit(s)]:
150 Grand Valley Ave.
Orwell, **Ohio**

Description of proposed emissions unit(s):
Modification of emissions testing requirements.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
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 (i.e., postmarked) quarterly 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

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)

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.

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 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

Pollutant	Tons Per Year
PE	32.71
PM-10	17.61

Emissions Unit ID: **F001**

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 is a grinder with an air return 4968 cfm dust collector, P4-83. See section A.I.2.a.	OAC rule 3745-31-05 (A)(3)	1.53 tons fugitive PE per year and 1.53 tons fugitive PM-10 per year from the grinder 20% visible fugitive emissions, as a three-minute average, from the grinder

2. Additional Terms and Conditions

2.a The dust collector exhaust does not vent into the atmosphere. Rather, the exhaust air from the dust collector is recirculated into the grinder and becomes process air in the grinder. The grinder has an opening through which excess air escapes.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the grinder. 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 location and 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.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observations from daily to weekly for the grinder 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.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the grinder and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Director (the Ohio EPA, Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

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. <u>Emission Limitation</u>

Emissions Unit ID: **F001**

20% visible fugitive emissions from the grinder, as a three-minute average

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested.

b. Emissions Limitations
1.53 tons fugitive PE per year and 1.53 tons fugitive PM-10 per year from the grinder

Applicable Compliance Method
Compliance shall be determined as follows:

E = SU x EF x (1-CE)

Where:
E = Annual emissions, in tons
SU = Amount of sawdust unloaded per year, in tons
EF = Emission factor of 0.35 lb/ton from RACM Table 2.17, Fugitive dust Emission factors for Woodworking Operations
CE = Control efficiency estimated to be 80% for the cyclone.

F. Miscellaneous Requirements

None

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F002 is the sawdust storage silo and truck loading with a 1,500 cfm air return baghouse, P4-13430. See section A.I.2.a.	OAC rule 3745-31-05 (A)(3)	0.19 ton fugitive PE per year and 0.19 ton fugitive PM-10 per year from truck loading 20 % visible fugitive emissions from truck loading, as a three-minute average

2. Additional Terms and Conditions

2.a Sawdust is collected from many baghouses in Plant 3 and transported via a collector system to the sawdust storage silo. The exhaust from the silo baghouse does not vent into the atmosphere. Rather, the exhaust air from this baghouse is recirculated into the collector system which transports the dust into the silo. The fugitive emissions permitted in this emissions unit are for loading sawdust from the silo into trucks.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the truck loading. 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.

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.

Notwithstanding the frequency of reporting requirements specified above, the permittee may reduce the frequency of visual observations from daily to weekly for the grinder 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.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible emissions of fugitive dust were observed from the truck loading 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

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):

Emissions Unit ID: **F002**

a. Emission Limitation
20% visible fugitive emissions from truck loading, as a three-minute average

Applicable Compliance Method
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested.

b. Emission Limitation
0.19 ton fugitive PE and 0.19 ton fugitive PM-10 per year from truck loading

Applicable Compliance Method
Compliance shall be determined as follows:

E = SU x EF x (1-CE)

Where:
E = Annual emissions, in tons
SU = Amount of sawdust unloaded per year, in tons
EF = Emission factor of 2 lbs PE/ton sawdust unloaded, taken from RACM Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations
CE = Control efficiency estimated to be 75% for the telescopic tube and 3-sided enclosure, as determined using RACM Table 2.17-3.

F. Miscellaneous Requirements

None

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 is all woodworking equipment which vents into P4-20865 (former facility ID P4-270), a 36,432 cfm baghouse.	OAC rule 3745-31-05 (A)(3)	0.005 grain Particulate Emissions (PE) per dscf and 0.0025 grain PM-10 per dscf from the baghouse stack
See attached Table P3-P1. (P3 is Plant 3.)		1.56 lbs PE/hour and 6.84 tons per year from the baghouse stack
Modification		0.78 lb PM-10 per hour and 3.42 tons per year from the baghouse stack
		0% visible emissions from the baghouse stack, as a six-minute average
	OAC rule 3745-17-11 (B)	See A.2.b.
	OAC rule 3745-17-07 (A)(1)	See A.2.b.

2. Additional Terms and Conditions

2.a This permit to install (PTI 02-20472) includes the following tables:

Table P3- P1 P001 - Emission Units which are vented to Baghouse P4-20865

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

Table P3- P4	P004 - Emission Units which are vented to Baghouse P4-12743
Table P3- A	All PTI exempt Emissions Units at Plant 3

2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-03(A)(3).

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. 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.

C. Monitoring and/or Record keeping 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.

   Notwithstanding the frequency of reporting requirements specified above, the permittee

may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

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

3. Should a bag leak detector be installed and operated as specified in B.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 B.2 the facility shall not be required to maintain records specified in C.1 and C.2 above.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all period of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

2. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

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. <u>Emission Limitation</u>
0% visible emissions from the baghouse stack, as a six-minute average

<u>Applicable Compliance Method</u>
Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested.

b. Emission Limitation
1.56 lbs PE per hour and 6.84 tons PE per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

c. Emission Limitation
0.78 lbs PM-10 per hour and 3.42 tons PM-10 per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

d. Emission Limitation
0.005 grain PE/dscf and 0.0025 grain PM-10/dscf from baghouse exhaust

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2..

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

a. Emissions testing was conducted on P010 (P1-13326) on July 8, 2005, at Plant 1. Emissions testing was conducted on P021 (P2-10915) on July 6, 2005, and on P020 (P2-10918) on July 7, 2005, at Plant 2. Emissions testing was conducted on P006 (P3-12741) on July 19, 2005, at Plant 3. The results of this testing indicated the tested emissions units are operating in compliance with the emissions limitations specified in this permit. Emissions testing shall be completed on 2 - 6 of the following emissions units each year, such that all the listed emissions units have been tested within 5 years of issuance of this permit.

P1-P008 (P1-13325)	P1-P009 (P1-13327)
P1-P013 (P1-13323)	P2-P014 (P2-10905)
P2-P012 (P2-10903)	P2-P006 (P2-10916)
P2-P010 (P2-10904)	P2-P013 (P2-10914)
P2-P007 (P2-10911)	P2-P011 (P2-10909)
P2-P021 (P2-10917)	P3-P007 (P3-20879)
P3-P005 (P3-12740)	

The following emissions units exhaust inside the plant. The configuration of the

baghouse stack and the air conditioning unit does not allow for emissions testing, as Reference Method 1 cannot be met. Should any of these units be modified to allow for emissions testing, the modified unit must be tested within 90 days following the modification.

P1-P012 (P1-13322)	P3-P001 (P3-20865)
P3-P002 (P3-20866)	P3-P003 (P3-12742)

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 A.1.

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

Methods 1 - 5 and 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.

F. Miscellaneous Requirements

1. This permit to install (PTI 02-20472) is designed to contain all woodworking emissions units, excluding the coating application processes, roadways and parking areas, which are required to obtain a permit to install and a list of all insignificant emissions units at this facility. This permit will typically be modified whenever KraftMaid Cabinetry Plant 3

applies for a permit to either modify existing emissions units or to install new emissions units at this facility.

2. The permittee shall submit updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

   After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted.

   The updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 will be included in the next modification to PTI 02-20472. If none of the Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 requires an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

3. The permittee shall submit an updated Emissions Unit Table A (PTI exempt Emissions Units) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. 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 Emissions Unit Table A will be included in the next modification to PTI 02-20472. If Emissions Unit Table A does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

4. This permit replaces any previous permit issued for any equipment included in this permit-to-install.

5. The following terms and conditions specified above are federally enforceable: A.1, A.2,

Emissions Unit ID: **P001**

B.1, B.2, C.1, C.2, C.3, D.1, D.2, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P1 for emissions unit P001 at Plant 3
EPA Label = P4-270
EPA Label = P3-20865
Date 6/2005

EQUIPMENT	**SIZE OF DUCT IN INCHES**
BRUSH ASSEMBLY DENNIBER P4-308	5
BRUSH ASSEMBLY DENNIBER P4-308	5
BRUSH ASSEMBLY DENNIBER P4-308	5
BRUSH ASSEMBLY DENNIBER P4-308	5
BRUSH ASSEMBLY DENNIBER P4-308	6
BRUSH ASSEMBLY DENNIBER P4-308	6
DOWN DRAFT TABLE P4-309	10
SORBINI PANEL CLEANER P4-310	6
SORBINI PANEL CLEANER P4-310	6
SORBINI PANEL CLEANER P4-310	6
SORBINI PANEL CLEANER P4-310	8
BRUSH ASSEMBLY DENNIBER P4-318	5
BRUSH ASSEMBLY DENNIBER P4-318	5
BRUSH ASSEMBLY DENNIBER P4-318	5
BRUSH ASSEMBLY DENNIBER P4-318	5
BRUSH ASSEMBLY DENNIBER P4-318	6
BRUSH ASSEMBLY DENNIBER P4-318	6
DOWN DRAFT TABLE P4-319	10
DOWN DRAFT TABLE P4-320	10

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
P002 is all woodworking equipment which vents into P4-20866 (former facility ID P4-345), a 58,500 cfm Honeywell baghouse. See attached Table P3-P2. (P3 is Plant 3.) Modification	OAC rule 3745-31-05 (A)(3) OAC rule 3745-17-11 (B)	OAC rule 3745-17-07 (A)(1)

Applicable Emissions
Limitations/Control Measures

0.005 grain Particulate Emissions (PE) per dscf and 0.0025 grain PM-10 per dscf from the baghouse exhaust

2.51 lbs PE per hour and 10.98 tons PE per year from the baghouse stack

1.25 lbs PM-10 per hour and 5.49 tons PM-10 per year from the baghouse stack

0% visible emissions from the baghouse stack, as a six-minute average

0.10 ton fugitive PE per year and 0.10 ton fugitive PM-10 per year from the dumpster

10% visible fugitive emissions from the dumpster loading, as a three-minute average

See A.2.b.

See A.2.b.

2. Additional Terms and Conditions

2.a This permit to install (PTI 02-20472) includes the following tables:

Table P3- P1	P001 - Emission Units which are vented to Baghouse P4-20865
Table P3- P2	P002 - Emission Units which are vented to Baghouse P4-20866
Table P3- P3	P003 - Emission Units which are vented to Baghouse P4-12742
Table P3- P4	P004 - Emission Units which are vented to Baghouse P4-12743
Table P3- A	All PTI exempt Emissions Units at Plant 3

2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-03(A)(3).

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. 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.

C. Monitoring and/or Record keeping 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 above, 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.

5. The permittee shall revert to daily readings if any visible emissions are observed.
   Should a bag leak detector be installed and operated as specified in B.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 B.2 the facility shall not be required to maintain records specified in C.1 and C.2 above.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

2. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

3. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

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. <u>Emission Limitation</u>
   0% visible emissions from the baghouse stack, as a six-minute average
   10% visible fugitive emissions from the dumpster, as a three-minute average

   <u>Applicable Compliance Method</u>
   Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested**.**

   b. <u>Emission Limitation</u>
   0.10 ton fugitive PE and 0.10 ton fugitive PM-10 per year from the dumpster

   <u>Applicable Compliance Method</u>
   Compliance shall be determined as follows:

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

   Where:
   E = Annual emissions, in tons
   SU = Amount of sawdust unloaded per year, in tons
   EF = Emission factor of 2 lbs PE/ton sawdust unloaded, taken from RACM Table

2.17-1, Fugitive Dust Emission Factors for Woodworking Operations
CE = Control efficiency estimated to be 75% for the telescopic tube

c. Emission Limitation
2.51 lbs PE per hour and 10.98 tons PE per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

d. Emission Limitation
1.25 lbs PM-10 per hour and 5.49 tons PM-10 per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

e. Emission Limitation
0.005 grain PE/dscf and 0.0025 grain PM-10/dscf from baghouse exhaust

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

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

a. Emissions testing was conducted on P010 (P1-13326) on July 8, 2005, at Plant 1. Emissions testing was conducted on P021 (P2-10915) on July 6, 2005, and on P020 (P2-10918) on July 7, 2005, at Plant 2. Emissions testing was conducted on P006 (P3-12741) on July 19, 2005, at Plant 3. The results of this testing indicated the tested emissions units are operating in compliance with the emissions limitations specified in this permit. Emissions testing shall be completed on 2 - 6 of the following emissions units each year, such that all the listed emissions units have been tested within 5 years of issuance of this permit.

P1-P008 (P1-13325)	P1-P009 (P1-13327)
P1-P013 (P1-13323)	P2-P014 (P2-10905)
P2-P012 (P2-10903)	P2-P006 (P2-10916)
P2-P010 (P2-10904)	P2-P013 (P2-10914)
P2-P007 (P2-10911)	P2-P011 (P2-10909)
P2-P021 (P2-10917)	P3-P007 (P3-20879)
P3-P005 (P3-12740)	

The following emissions units exhaust inside the plant. The configuration of the baghouse stack and the air conditioning unit does not allow for emissions testing, as Reference Method 1 cannot be met. Should any of these units be modified to allow for emissions testing, the modified unit must be tested within 90 days following the modification.

P1-P012 (P1-13322)	P3-P001 (P3-20865)
P3-P002 (P3-20866)	P3-P003 (P3-12742)

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 A.1.

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

Methods 1 - 5 and 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.

F. Miscellaneous Requirements

1. This permit to install (PTI 02-20472) is designed to contain all woodworking emissions units, excluding the coating application processes, roadways and parking areas, which are required to obtain a permit to install and a list of all insignificant emissions units at this facility. This permit will typically be modified whenever KraftMaid Cabinetry Plant 3 applies for a permit to either modify existing emissions units or to install new emissions units at this facility.

2. The permittee shall submit updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

   After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted.

   The updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 will be included in the next modification to PTI 02-20472. If none of the Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 requires an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

3. The permittee shall submit an updated Emissions Unit Table A (PTI exempt Emissions Units) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. 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 Emissions Unit Table A will be included in the next modification to PTI 02-20472. If Emissions Unit Table A does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

4. This permit replaces any previous permit issued for any equipment included in this permit-to-install.

5. The following terms and conditions specified above are federally enforceable: A.1, A.2, B.1, B.2, C.1, C.2, C.3, C.4, C.5, D.1, D.2, D.3, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P2 for emissions unit P002 at Plant 3

Emissions Unit ID: **P002**

EPA Label = P4-345
EPA Label = P3-20866
Date 6/2005

EQUIPMENT	**SIZE OF DUCT IN INCHES**
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-383 (PRIMER)	6
DOWN DRAFT TABLE P4-384 (PRIMER)	10
SORBINI PANEL CLEANER P4-385 (PRIMER)	6
SORBINI PANEL CLEANER P4-385 (PRIMER)	6
SORBINI PANEL CLEANER P4-385 (PRIMER)	6
SORBINI PANEL CLEANER P4-385 (PRIMER)	8
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	5
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-393 (PRIMER)	6
DOWN DRAFT TABLE P4-394 (PRIMER)	10
DOWN DRAFT TABLE P4-395 (PRIMER)	10
BRUSH ASSEMBLY DENNIBER P4-402 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-02 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-402 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-402 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-402 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-402 (TOP COAT)	6
DOWN DRAFT TABLE P4-403 (TOP COAT)	10
SORBINI PANEL CLEANER P4-404 (TOP COAT)	6
SORBINI PANEL CLEANER P4-404 (TOP COAT)	6
SORBINI PANEL CLEANER P4-404 (TOP COAT)	6
SORBINI PANEL CLEANER P4-404 (TOP COAT)	8
BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)	5
BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)	6

BRUSH ASSEMBLY DENNIBER P4-415 (TOP COAT)		6
DOWN DRAFT TABLE P4-416 (TOP COAT)		10
PANEL CLEANER P4-418	6	

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-17-07 (A)(1)
P003 is all woodworking equipment which vents into P4-12742 (former facility ID P4-159), a 34,750 cfm baghouse. See attached Table P3-P4. (P3 is Plant 3.) Modification	OAC rule 3745-31-05 (A)(3)	
	OAC rule 3745-17-11 (B)	

Applicable Emissions Limitations/Control Measures
0.005 grain Particulate Emissions (PE) per dscf and 0.0025 grain PM-10 per dscf from the baghouse exhaust
1.49 lbs PE/hour and 6.52 tons per year from the baghouse stack
0.74 lb PM-10 per hour and 3.26 tons per year from the baghouse stack
0% visible emissions from the baghouse stack, as a six-minute average
0.37 ton fugitive PE per year and 0.37 ton fugitive PM-10 per year from the dumpster
10% visible fugitive emissions from the dumpster, as a three-minute average
See A.2.b.
See A.2.b.

2. Additional Terms and Conditions

2.a This permit to install (PTI 02-20472) includes the following tables:

Table P3- P1 P001 - Emission Units which are vented to Baghouse P4-20865

Table P3- P2 P002 - Emission Units which are vented to Baghouse P4-

20866	
Table P3- P3	P003 - Emission Units which are vented to Baghouse P4-
12742	
Table P3- P4	P004 - Emission Units which are vented to Baghouse P4-
12743	
Table P3- A	All PTI exempt Emissions Units at Plant 3

2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-03(A)(3).

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. 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.

C. Monitoring and/or Record keeping 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 above, the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

   a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

   b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

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

5. Should a bag leak detector be installed and operated as specified in B.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 B.2 the facility shall not be required to maintain records specified in C.1 and C.2 above.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

2. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

3. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

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. Emission Limitation
   0% visible emissions from the baghouse stack, as a six-minute average
   10% visible fugitive emissions from the dumpster, as a three-minute average

   Applicable Compliance Method
   Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested.

   b. Emission Limitation
   0.37 ton fugitive PE and 0.37 ton fugitive PM-10 per year from the dumpster

   Applicable Compliance Method
   Compliance shall be determined as follows:

   $E = SU \times EF$

   Where:
   E = Annual emissions, in tons
   SU = Amount of sawdust unloaded per year, in tons
   EF = Emission factor of 2 lbs PE/ton sawdust unloaded, taken from RACM Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations

c. Emission Limitation
1.49 lbs PE/hour and 6.52 tons per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

d. Emission Limitation
0.74 lbs PM-10 per hour and 3.26 tons PM-10 per year from the baghouse stack

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

e. Emission Limitation
0.005 grain PE/dscf and 0.0025 grain PM-10/dscf from the baghouse exhaust

Applicable Compliance Method
OAC rule 3745-17-03(B)(10). See section E.2.

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

a. Emissions testing was conducted on P010 (P1-13326) on July 8, 2005, at Plant 1. Emissions testing was conducted on P021 (P2-10915) on July 6, 2005, and on P020 (P2-10918) on July 7, 2005, at Plant 2. Emissions testing was conducted on P006 (P3-12741) on July 19, 2005, at Plant 3. The results of this testing indicated the tested emissions units are operating in compliance with the emissions limitations specified in this permit. Emissions testing shall be completed on 2 - 6 of the following emissions units each year, such that all the listed emissions units have been tested within 5 years of issuance of this permit.

P1-P008 (P1-13325)	P1-P009 (P1-13327)
P1-P013 (P1-13323)	P2-P014 (P2-10905)
P2-P012 (P2-10903)	P2-P006 (P2-10916)
P2-P010 (P2-10904)	P2-P013 (P2-10914)
P2-P007 (P2-10911)	P2-P011 (P2-10909)
P2-P021 (P2-10917)	P3-P007 (P3-20879)
P3-P005 (P3-12740)	

The following emissions units exhaust inside the plant. The configuration of the baghouse stack and the air conditioning unit does not allow for emissions testing, as Reference Method 1 cannot be met. Should any of these units be modified to allow for emissions testing, the modified unit must be tested within

90 days following the modification.

P1-P012 (P1-13322)	P3-P001 (P3-20865)
P3-P002 (P3-20866)	P3-P003 (P3-12742)

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 A.1.

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

Methods 1 - 5 and 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.

F. Miscellaneous Requirements

1. This permit to install (PTI 02-20472) is designed to contain all woodworking emissions units, excluding the coating application processes, roadways and parking areas, which are required to obtain a permit to install and a list of all insignificant emissions units at this facility. This permit will typically be modified whenever KraftMaid Cabinetry Plant 3 applies for a permit to either modify existing emissions units or to install new emissions units at this facility.

2. The permittee shall submit updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down

and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In

general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted.

The updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 will be included in the next modification to PTI 02-20472. If none of the Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 requires an update, the permittee shall submit a report by February 28 of each year that states no revisions are required.

3. The permittee shall submit an updated Emissions Unit Table A (PTI exempt Emissions Units) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. 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 Emissions Unit Table A will be included in the next modification to PTI 02-20472. If Emissions Unit Table A does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

4. This permit replaces any previous permit issued for any equipment included in this permit-to-install.

5. The following terms and conditions specified above are federally enforceable: A.1, A.2, B.1, B.2, C.1, C.2, C.3, C.4, C.5, D.1, D.2, D.3, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P3 for emissions unit P003 at Plant 3
EPA Label = P4-159
EPA Label = P3-12742
Date 6/2005

EQUIPMENT	**SIZE OF DUCT IN INCHES**
BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6

Emissions Unit ID: **P003**

BRUSH ASSEMBLY DENNIBER P4-03 (PRIMER)	6
SORBINI PANEL CLEANER P4-05 (PRIMER)	8
SORBINI PANEL CLEANER P4-05 (PRIMER)	8
SORBINI PANEL CLEANER P4-05 (PRIMER)	8
SORBINI PANEL CLEANER P4-05 (PRIMER)	6
DMC ROTO SAND UNIT P4-12 (PRIMER)	8
DMC ROTO SAND UNIT P4-12 (PRIMER)	10
DOWN DRAFT TABLE P4-13 (PRIMER)	8
DOWN DRAFT TABLE P4-14 (PRIMER)	8
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-39 (TOP COAT)	6
DOWN DRAFT TABLE P4-277 (TOP COAT)	8
SORBINI PANEL CLEANER P4-23 (TOP COAT)	8
SORBINI PANEL CLEANER P4-23 (TOP COAT)	8
SORBINI PANEL CLEANER P4-23 (TOP COAT)	8
SORBINI PANEL CLEANER P4-23 (TOP COAT)	6
DMC ROTO SAND UNIT P4-33 (TOP COAT)	10
DMC ROTO SAND UNIT P4-33 (TOP COAT)	8
DMC ROTO SAND UNIT P4-33 (TOP COAT)	6
DOWN DRAFT TABLE P4-278 (TOP COAT)	8

PART II - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 is all woodworking equipment which vents into P3-12743 (former facility ID P4-160), a 31,150 cfm baghouse. See attached Table P3-P4. (P3 is Plant 3.)	OAC rule 3745-31-05 (A)(3)	0.005 grain Particulate Emissions (PE) per dscf and 0.0025 grain PM-10 per dscf from baghouse exhaust 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 0.33 ton fugitive PE per year and 0.33 ton fugitive PM-10 per year from the dumpster 10% visible fugitive emissions from the dumpster, as a three-minute average
	OAC rule 3745-17-11 (B) OAC rule 3745-17-07 (A)(1)	See A.2.b.

See A.2.b.

2. Additional Terms and Conditions

2.a This permit to install (PTI 02-20472) includes the following tables:

Table P3- P1	P001 - Emission Units which are vented to Baghouse P4-20865
Table P3- P2	P002 - Emission Units which are vented to Baghouse P4-20866
Table P3- P3	P003 - Emission Units which are vented to Baghouse P4-12742
Table P3- P4	P004 - Emission Units which are vented to Baghouse P4-12743
Table P3- A	All PTI exempt Emissions Units at Plant 3

2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-03(A)(3).

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. 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.

C. Monitoring and/or Record keeping 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 above, the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

   a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

   b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

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

5. Should a bag leak detector be installed and operated as specified in B.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 B.2 the facility shall not be required to maintain records specified in C.1 and C.2 above.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

2. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the

previous 6-month periods. Should the facility opt to install a bag leak detector, this reporting requirement shall be vacated.

3. The permittee shall submit semiannual 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) by January 31 and July 31 of each year and shall cover the previous 6-month periods. February 1, 2006

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. Emission Limitation
   0% visible emissions from the baghouse stack, as a six-minute average
   10% visible fugitive emissions from the dumpster, as a three-minute average

   Applicable Compliance Method
   Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if requested.

   b. Emission Limitation
   0.33 ton fugitive PE and 0.33 ton fugitive PM-10 per year from the dumpster

   Applicable Compliance Method
   Compliance shall be determined as follows:

   E = SU x EF

   Where:
   E = Annual emissions, in tons
   SU = Amount of sawdust unloaded per year, in tons
   EF = Emission factor of 2 lbs PE/ton sawdust unloaded, taken from RACM Table 2.17-1, Fugitive Dust Emission Factors for Woodworking Operations

   c. Emission Limitation
   1.34 lbs PE/hour and 5.85 tons per year from the baghouse stack

Applicable Compliance Method
This limitation is based upon the design of the baghouse and compliance with the grain loading limitation. Compliance with the grain loading limitation has been demonstrated at similar, but larger, control equipment at this facility. OAC rule 3745-17-03(B)(10), if requested.

d. Emission Limitation
0.67 lb PM-10 per hour and 2.92 tons per year from the baghouse stack

Applicable Compliance Method
This limitation is based upon the design of the baghouse and compliance with the grain loading limitation. Compliance with the grain loading limitation has been demonstrated at similar, but larger, control equipment at this facility. OAC rule 3745-17-03(B)(10), if requested.

e. Emission Limitation
0.005 grain PE/dscf and 0.0025 grain PM-10/dscf from baghouse exhaust

Applicable Compliance Method
OAC rule 3745-17-03(B)(10), if requested.

F. Miscellaneous Requirements

1. This permit to install (PTI 02-20472) is designed to contain all woodworking emissions units, excluding the coating application processes, roadways and parking areas, which are required to obtain a permit to install and a list of all insignificant emissions units at this facility. This permit will typically be modified whenever KraftMaid Cabinetry Plant 3 applies for a permit to either modify existing emissions units or to install new emissions units at this facility.

2. The permittee shall submit updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 to the Director (the Ohio EPA, Northeast District Office) on an annual basis. The updated Tables shall include an updated demonstration of loading to each baghouse. The updated tables shall include a complete list of emissions units for each table (including an identification of all emissions unit(s) that is/are permanently shut down and dismantled and new or replacement emissions units) as of the end of the calendar year and shall highlight or otherwise flag the changes from the previous year. This report shall be submitted to the Director (the Ohio EPA, Northeast District Office) by February 28 of each year.

   After this report is submitted, the Director (the Ohio EPA, Northeast District Office) may consider the changes to determine if a modification to the issued permits is necessary. In general, a few changes which are not significant and which do not affect the operation of the control equipment will not trigger a request for an application to modify the issued permit be submitted.

   The updated Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 will be included in the next modification to PTI 02-20472. If none of the Emissions Unit Tables P3-P1, P3-P2, P3-P3 and P3-P4 requires an update, the permittee shall submit a report by

February 28 of each year that states no revisions are required.

3. The permittee shall submit an updated Emissions Unit Table A (PTI exempt Emissions Units) to the Director (the Ohio EPA, Northeast District Office) on an annual basis. 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 Emissions Unit Table A will be included in the next modification to PTI 02-20472. If Emissions Unit Table A does not require an update, the permittee shall submit a report by February 28 of each year that states no revision is required.

4. This permit replaces any previous permit issued for any equipment included in this permit-to-install.

5. The following terms and conditions specified above are federally enforceable: A.1, A.2, B.1, B.2, C.1, C.2, C.3, C.4, C.5, D.1, D.2, D.3, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P4 for emissions unit P004 at Plant 3
EPA Label = P4-160
EPA Label = P3-12743
Date 6/2005

EQUIPMENT	**SIZE OF DUCT IN INCHES**
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	6
BRUSH ASSEMBLY DENNIBER P4-136 (PRIMER)	6
SORBINI PANEL CLEANER P4-141 (PRIMER)	4
SORBINI PANEL CLEANER P4-141 (PRIMER)	6
SORBINI PANEL CLEANER P4-141 (PRIMER)	6
SORBINI PANEL CLEANER P4-141 (PRIMER)	6
DMC ROTO SAND UNIT P4-148 (PRIMER)	10
DMC ROTO SAND UNIT P4-148 (PRIMER)	6
DOWN DRAFT TABLE P4-149 (PRIMER)	8
DOWN DRAFT TABLE P4-150 (PRIMER)	8
BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)	6
BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)	6

Emissions Unit ID: **P004**

BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)		6
BRUSH ASSEMBLY DENNIBER P4-179 (TOP COAT)		6
DOWN DRAFT TABLE P4-180 (TOP COAT)		8
SORBINI PANEL CLEANER P4-181 (TOP COAT)		4
SORBINI PANEL CLEANER P4-181 (TOP COAT)		6
SORBINI PANEL CLEANER P4-181 (TOP COAT)		6
SORBINI PANEL CLEANER P4-181 (TOP COAT)		6
DMC ROTO SAND UNIT P4-135 (TOP COAT)	8	
DMC ROTO SAND UNIT P4-135 (TOP COAT)	8	
DMC ROTO SAND UNIT P4-135 (TOP COAT)	10	
DOWN DRAFT TABLE P4-188 (TOP COAT)		8

TABLE P3-A for all the PTI exempt emissions units at Plant 3

In addition, this facility has hand sanders, routers, miter saws, table saws and other wood working equipment which are exempt from PTI requirements.