



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

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: 02-21103**

**Fac ID: 0204000360**

**DATE: 5/1/2007**

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, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NEDO



Permit To Install  
Terms and Conditions

Issue Date: 5/1/2007  
Effective Date: 5/1/2007

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-21103**

Application Number: 02-21103  
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):  
**Modifiaction 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

**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21103**  
**Modification Issued: 5/1/2007**

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

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

#### **10. Public Disclosure**

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

#### **11. Applicability**

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

#### **12. Best Available Technology**

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	26.46
PM-10	13.23

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 consists of all woodworking equipment which vents into P3-12740 (former facility ID P4-157), a 47,000 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 baghouse exhaust
See attached Table P3-P5. P3 is Plant 3.		2.01 lbs PE/hour and 8.82 tons per year from the baghouse stack
Modification		1.01 lbs PM-10 per hour and 4.41 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 02-21103) includes the following tables:

Table P3-P5	P005 - Emissions Units which are vented to Baghouse P3-12740
Table P3-P6	P006 - Emissions Units which are vented to Baghouse

	P3-12741
Table P3-P7	P007 - Emissions Units which are vented to Baghouse
	P3-20879
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.

**Krafr****PTI A****Modification Issued: 5/1/2007**Emissions Unit ID: **P005**

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. Emission Limitation  
0% visible emissions from the baghouse stack, as a six-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  
2.01 lbs PE per hour and 8.82 tons PE per year from the baghouse stack

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Applicable Compliance Method

OAC rule 3745-17-03(B)(10). See E.2.

c. Emission Limitation

1.01 lbs PM-10 per hour and 4.41 tons PM-10 per year from the baghouse stack

Applicable Compliance Method

OAC rule 3745-17-03(B)(10). See 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 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.

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**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P005**

P1-P012 (P1-13322)  
P3-P002 (P3-20866)

P3-P001 (P3-20865)  
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 02-21103) 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-P5, P3-6 and P3-P7 to

**Kraft****PTI A****Modification Issued: 5/1/2007**Emissions Unit ID: **P005**

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-P5, P3-6 and P3-P7 will be included in the next modification to PTI 02-21103. If none of the Emissions Unit Tables P3-P5, P3-6 and P3-P7 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 P3-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 P3-A will be included in the next modification to PTI 02-21103. If Emissions Unit Table P3-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, D.1, D.2, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P5 for emissions unit P005 at Plant 3  
EPA Label = P4-157

**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P005**

EPA Label = P3-12740  
 Date 6/2005

<b>EQUIPMENT</b>	<b>SIZE OF DUCT IN INCHES</b>
Moulding Cell Saw	7
Moulding Cell Saw	7
Hinge Cell #3 EZR Halfmoon Drill	7
Hinge Cell #3 EZR Cup Drill	7
Hinge Cell #3 EZR Snake Eyes Drill	7
Hinge Cell #3 Bumper Drill	7
Hinge Cell #3 Cup Hinge Drill	7
Drill Front Cell Bumper Drill	3
Mission Oak Cell Table Drill	3
Mission Oak Cell Table Drill	3
Mission Oak Cell Table Drill	3
Mission Oak Cell Table Drill	7
Pine Cell EZR Snake Eyes Drill	7
Pine Cell EZR Bumper Drill	7
Pine Cell EZR Pine EZR Drill	5
Pine Cell Bumper Drill	7
Pine Cell Bumper Drill	10
End Panel Cell Whirlwind Sander	8
End Panel Cell Delta Shaper	8
End Panel Cell Back Groover	8
End Panel Cell Delta Table Saw	7
KSMC Cell KSMC Drill	7
KSMC Cell KSMC Drill	7
KSMC Cell Bumper Drill	5
Hinge Cell #4 EZR Cup Drill	5
Hinge Cell #4 EZR Halfmoon Drill	7
Hinge Cell #4 EZR Snake Eyes Drill	7
Hinge Cell #4 Cup Hinge Drill	7
Hinge Cell #4 Bumper Drill	5
Hinge Cell #5 EZR Halfmoon Drill	7
Hinge Cell #5 EZR Cup Drill	7
Hinge Cell #5 EZR Snake Eyes Drill	7
Hinge Cell #5 Cup Hinge Drill	7
Hinge Cell #5 Bumper Drill	5
Hinge Cell #6 EZR Halfmoon Drill	7
Hinge Cell #6 EZR Cup Drill	7
Hinge Cell #6 EZR Snake Eyes Drill	7

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Hinge Cell #6 Cup Hinge Drill	7
Hinge Cell #6 Bumper Drill	7

TABLE P3-P5 for emissions unit P006 at Plant 3 continued

EPA Label = P4-157

EPA Label = P3-12740

Date 6/2005

Hinge Cell #7 EZR Halfmoon Drill	7
Hinge Cell #7 EZR Cup Drill	7
Hinge Cell #7 EZR Snake Eyes Drill	7
Hinge Cell #7 Cup Hinge Drill	7
Hinge Cell #7 Bumper Drill	5
Hinge Cell #8 EZR Halfmoon Drill	7
Hinge Cell #8 EZR Cup Drill	7
Hinge Cell #8 EZR Snake Eyes Drill	7
Hinge Cell #8 Cup Hinge Drill	7
Hinge Cell #8 Bumper Drill	7
Hinge Cell #1 EZR Halfmoon Drill	7
Hinge Cell #1 EZR Cup Drill	7
Hinge Cell #1 EZR Snake Eyes Drill	4
Hinge Cell #1 Cup Hinge Drill	7
Hinge Cell #1 Bumper Drill	7
Hinge Cell #2 EZR Halfmoon Drill	7
Hinge Cell #2 EZR Cup Drill	7
Hinge Cell #2 EZR Snake Eyes Drill	5
Hinge Cell #2 Cup Hinge Drill	7
Hinge Cell #2 Bumper Drill	7
Expedite Cell Cup Hinge Drill	7
Expedite Cell Cup Hinge Drill	7
Expedite Cell EZR Cup Hinge Drill	7
Expedite Cell EZR Cup Hinge Drill	7
Expedite Cell EZR Snake Eyes Drill	5
Expedite Cell Cup Hinge Drill	7
Expedite Cell Bumper Drill	7

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**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P005**



**Modification Issued: 5/1/2007**

Table P3-P6	P006 - Emissions Units which are vented to Baghouse
P3-12741	
Table P3-P7	P007 - Emissions Units which are vented to Baghouse
P3-20879	
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. Emission Limitation  
0% visible emissions from the baghouse stack, as a six-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  
2.01 lbs PE per hour and 8.82 tons PE per year from the baghouse stack

Modification Issued: 5/1/2007

Applicable Compliance Method

OAC rule 3745-17-03(B)(10). See E.2.

c. Emission Limitation

1.01 lbs PM-10 per hour and 4.41 tons PM-10 per year from the baghouse stack

Applicable Compliance Method

OAC rule 3745-17-03(B)(10). See 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 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-P013 (P1-13323)

P2-P012 (P2-10903)

P2-P010 (P2-10904)

P2-P007 (P2-10911)

P2-P021 (P2-10917)

P3-P005 (P3-12740)

P1-P009 (P1-13327)

P2-P014 (P2-10905)

P2-P006 (P2-10916)

P2-P013 (P2-10914)

P2-P011 (P2-10909)

P3-P007 (P3-20879)

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.

**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P006**

P1-P012 (P1-13322)  
P3-P002 (P3-20866)

P3-P001 (P3-20865)  
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 02-21103) 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-P5, P3-6 and P3-P7 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-P5, P3-6 and P3-P7 will be included in the next modification to PTI 02-21103. If none of the Emissions Unit Tables P3-P5, P3-6 and P3-P7 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 P3-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 P3-A will be included in the next modification to PTI 02-21103. If Emissions Unit Table P3-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, D.1, D.2, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P6 for emissions unit P006 at Plant 3  
EPA Label = P4-158

**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P006**

EPA Label = P3-12741  
 Date 6/2005

<b>EQUIPMENT</b>	<b>SIZE OF DUCT IN INCHES</b>
Sanding Line #1 Vacuum Blower	10
Sanding Line #1 Vacuum Blower	10
Sanding Line #1 Vacuum Blower	8
Sanding Line #1 Vacuum Blower	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 2-Head Sander	8
Sanding Line #1 3-Head Sander	8
Sanding Line #1 3-Head Sander	8
Sanding Line #1 3-Head Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Cross Grain Sander	8
Sanding Line #1 Rotary Polisher	8
Sanding Line #1 Sorbini	8
Sanding Line #1 Sorbini	8
Sanding Line#1 Sorbini	8
Sanding Line #1 Sorbini	8
Sanding Line #1 Sorbini	7
Sanding Line #1 Sorbini	7
Sanding Line #1 Downdraft Repair Table	7
Sanding Line #1 Downdraft Repair Table	7
Sanding Line #1 Downdraft Repair Table	7
Sanding Line #1 Downdraft Repair Table	7
Sanding Line #1 Downdraft Repair Table	7

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P007 is all woodworking equipment which vents into P3-20879, a 47,000 cfm baghouse.  See attached Table P3-P7. P3 is Plant 3.  Modification	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  2.01 lbs PE/hour and 8.82 tons per year from the baghouse stack  1.01 lbs PM-10 per hour and 4.41 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 02-21103) includes the following tables:

Table P3-P5                      P005 - Emissions Units which are vented to Baghouse  
 P3-12740

Modification Issued: 5/1/2007

Table P3-P6	P006 - Emissions Units which are vented to Baghouse P3-12741
Table P3-P7	P007 - Emissions Units which are vented to Baghouse P3-20879
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):

Modification Issued: 5/1/2007

- a. Emission Limitation  
0% visible emissions from the baghouse stack, as a six-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  
2.01 lbs PE per hour and 8.82 tons PE per year from the baghouse stack  
  
Applicable Compliance Method  
OAC rule 3745-17-03(B)(10). See E.2.
  - c. Emission Limitation  
1.01 lbs PM-10 per hour and 4.41 tons PM-10 per year from the baghouse stack  
  
Applicable Compliance Method  
OAC rule 3745-17-03(B)(10). See 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 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)

**Kraftmaid Cabinetry, Plant 3**  
**PTI Application: 02-21102**  
**Modif**

**Facility ID: 020400036**

**Emissions Unit ID: P007**

P2-P012 (P2-10903)  
 P2-P010 (P2-10904)  
 P2-P007 (P2-10911)  
 P2-P021 (P2-10917)  
 P3-P005 (P3-12740)

P2-P006 (P2-10916)  
 P2-P013 (P2-10914)  
 P2-P011 (P2-10909)  
 P3-P007 (P3-20879)

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-P002 (P3-20866)

P3-P001 (P3-20865)  
 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 02-21103) 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-P5, P3-6 and P3-P7 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.

Emissions Unit ID: **P007**

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-P5, P3-6 and P3-P7 will be included in the next modification to PTI 02-21103. If none of the Emissions Unit Tables P3-P5, P3-6 and P3-P7 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 P3-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 P3-A will be included in the next modification to PTI 02-21103. If Emissions Unit Table P3-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, D.1, D.2, E.1, E.2, F.1, F.2, F.3, and F.4.

TABLE P3-P7 for emissions unit P007 at Plant 3  
EPA Label = P3-20879  
Date 6/2005

<b>EQUIPMENT</b>	<b>SIZE OF DUCT IN INCHES</b>
Sanding Line #2 Vacuum Blower	16
Sanding Line #2 Vacuum Blower	13
Sanding Line #2 Vacuum Blower	16
Sanding Line #2 Vacuum Blower	13
Sanding Line #2 2-Head Sander	8
Sanding Line #2 2-Head Sander	8
Sanding Line #2 2-Head Sander Cosma	8

**Kraft****PTI A****Modification Issued: 5/1/2007**Emissions Unit ID: **P007**

Sanding Line #2 3-Head Sander	8
Sanding Line #2 3-Head Sander	8
Sanding Line #2 3-Head Sander	8
Sanding Line #2 Crossgrain Sander	7
Sanding Line #2 Crossgrain Sander	7
Sanding Line #2 Crossgrain Sander	7
Sanding Line #2 Crossgrain Sander	7
Sanding Line #2 Gyro Fladder	10
Sanding Line #2 Gyro Fladder	10
Sanding Line #2 Rotary Polisher	10
Sanding Line #2 Sorbini	7
Sanding Line #2 Sorbini	7

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.