State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
HOLMES COUNTY

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 02-16108

DATE: 4/2/2002

Berlin Wood Products Inc
Art Yoder
PO Box 184
Berlin, OH 44610

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

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

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 4/2/2002**
Terms and Conditions	**Effective Date: 4/2/2002**

FINAL PERMIT TO INSTALL 02-16108

Application Number:	02-16108
APS Premise Number:	0238000109
Permit Fee:	**$600**
Name of Facility:	Berlin Wood Products Inc
Person to Contact:	Art Yoder
Address:	PO Box 184 Berlin, OH 44610

Location of proposed air contaminant source(s) [emissions unit(s)]:
5039 County Road 120
Berlin, **Ohio**

Description of proposed emissions unit(s):
Dip Tank.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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 thirty (30) 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	8.1
OC	11.8

Emissions Unit ID: **P001**

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 - Planers, sanders and saws for the production of wood parts controlled by a primary cyclone and secondary, 21,532 acfm return air baghouse. Wood waste silo controlled by a small cyclone and returned to the return air baghouse.	OAC rule 3745-31-05(A)(3)	0.01 grain per dscf of exhaust gas, 1.85 pound per hour and 8.10 tons per year of particulate matter. No visible emissions except for one (1) minute in any hour from any building opening.
	OAC rule 3745-17-07(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Less stringent than OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's

recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.

2. The baghouse shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.

3. The waste wood storage silo vent shall be controlled by the cyclone and baghouse at all times the woodworking shop is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the bag house while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall maintain copies of the record of the daily pressure drop readings at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

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.

2. All deviation (excursion) reports shall be submitted in accordance with Section 2.b. of the General Terms and Conditions.

E. Testing Requirements

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

   a. Emission Limitation:
   0.01 gr/dscf and 1.85 pound per hour of particulate matter emissions

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

b. Emission Limitation:
8.10 tons per year of particulate matter emissions

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

(0.03 gr/dscf) X (21,532 cfm) X (60 min/hr) X (8760 hr/yr) X (lb/7000 gr) X (ton/2000 lb) X (1-.999)

Where:
0.03 gr/dscf is the emission factor from AP-42, table 10.4-1 version 2/80; and
21,532 cfm is the dust collector flow rate; and
99.9% is the dust collector control efficiency.

c. Emission Limitation:
No visible emission except for one (1) minute in any hour for any building opening.

Applicable Compliance Methods:
If required,compliance shall be determined according to USEPA Method 22, 40 CFR 60, Appendix A.

F. Miscellaneous Requirements

None.

Emissions Unit ID: **R004**

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
R004 - Dip tank (48 in. long x 12 in. wide x 15 in. high) to coat wood and metal parts.	OAC rule 3745-31-05(A)(3)	See A.2.c, A.2.d and A.2.e below The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-09(U).
	OAC rule 3745-21-07(G)(2)	See A.2.a below.
	OAC rule 3745-21-09(U)	See A.2.b below.

2. Additional Terms and Conditions

2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited when coating non-metal parts.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2.b On the days metal parts are coated, the permittee shall employ no more than 10 gallons

per day of coating, as applied.

2.c On the days metal parts are coated, organic compound (OC) emissions shall not exceed 64.5 pounds per day.

2.d On the days non-metal parts are coated, organic compound (OC) emissions shall not exceed 39.5 pounds per day.

2.d OC emissions shall not exceed 11.8 tons per year.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

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

   a. The company identification for each coating and cleanup material employed.

   b. The type of substrate being coated, i.e. metal or non-metal.

   c. The number of gallons of each coating and cleanup material employed.

   d. The OC content of each coating and cleanup material, in pounds OC per gallon.

   e. The total emission rate for all coatings and materials, in pounds OC per day.

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

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

   a. For days metal parts were coated, an identification of each day during which the total coating usage exceeded 10 gallons per day, and the actual total coating usage.

b. For days metal parts were coated, an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 64.5 lbs/d, and the actual average OC emissions for each such day.

c. For days non-metal parts were coated, an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 39.5 lbs/d, and the actual average OC emissions for each such day.

2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

   a. Emission Limitation:
   39.5 lbs OC/d when non-metal parts are coated

   Applicable Compliance Method-
   Compliance shall be based on the record keeping requirements as specified in term C.1.

   b. Emission Limitation-
   64.5 lbs OC/day when metal parts are coated

   Applicable Compliance Method-
   Compliance shall be based on the record keeping requirements as specified in term C.1.

   c. Emission Limitation-
   11.8 tpy of OC

   Applicable Compliance Method-
   Compliance shall be based on the record keeping requirements as specified in term C.1 and shall be the sum of the 365 daily emission rates for the calendar year.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

None.