



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

4/19/2011

Edward Beachy
Beachy Woodworking
14290 CR 75
Brinkhaven, OH 43006

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000225
Permit Number: P0084838
Permit Type: Renewal
County: Holmes

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Beachy Woodworking**

Facility ID:	0238000225
Permit Number:	P0084838
Permit Type:	Renewal
Issued:	4/19/2011
Effective:	4/19/2011
Expiration:	4/19/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Beachy Woodworking

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Authorization

Facility ID: 0238000225
Application Number(s): A0015405, A0015406, A0015407
Permit Number: P0084838
Permit Description: Renewal PTIO for wood furniture operation; wood shop, manual coating booth and 325 HP stationary diesel engine.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/19/2011
Effective Date: 4/19/2011
Expiration Date: 4/19/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Beachy Woodworking
14290 CR 75
Brinkhaven, OH 43006

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

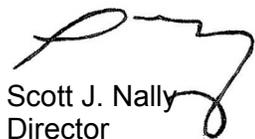
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0084838
Permit Description: Renewal PTIO for wood furniture operation; wood shop, manual coating booth and 325 HP stationary diesel engine.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Sealer/Topcoat Booth
Superseded Permit Number:	02-22810
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Wood Shop
Superseded Permit Number:	02-22810
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Diesel Engine
Superseded Permit Number:	02-22810
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a



renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. K001, Sealer/Topcoat Booth

Operations, Property and/or Equipment Description:

Spray booth w/ filters to coat wood furniture using an airless spray gun.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b(1)(d), d(7) – d(10), and e)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 18.35 pounds/hour (lbs/hr). VOC content of any coating shall not exceed 5.56 lbs/gal, as applied.</p> <p>VOC emissions from coating operations at this facility shall not exceed 21.41 tons/year (tpy) from all coatings and clean up materials. See b)(2)b.</p>
b	OAC rule 3745-17-11(C)	See b)(2)c.
c	OAC rule 3745-21-15(A)	Exempt. See b)(2)d.
d	ORC 3704.03(F)(4)(c)	See d)(7) – d)(10) and e)(3).

(2) Additional Terms and Conditions

a. The hourly **VOC** emissions limitation was established to reflect the uncontrolled potential to emit for this emissions unit. Therefore, it is not necessary to develop daily record keeping and/or reporting requirements to ensure compliance with this emissions limitation.

- b. This facility includes the following emissions units: P001, P002, K001, and K002 (stain booth exempt per OAC rule 3745-31-03(A)(1)(kk)).
 - c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
 - d. In accordance with OAC rule 3745-21-15(A)(2)(a), any facility that has the potential to emit VOC less than 25.0 tpy from all wood furniture manufacturing operations combined is exempt from the requirements of this rule.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each month for K001 & K002:
 - a. the company identification for each coating and clean up material employed;
 - b. the VOC content of each coating and clean up material, in lbs/gallon;
 - c. the number of gallons of each coating and clean up material employed minus the number of gallons of each coating and clean up material recovered for disposal;
 - d. the total VOC emissions from all coatings & clean up materials, in lbs/month (sum of b x c); and
 - e. the total annual VOC emissions for the facility, in tons/year
 - (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
 - (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request
- (7) The **PTIO** application for this emissions unit, **K001**, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour work week, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold

Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s)

Toxic Contaminant: toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (lbs/hr): 1.27

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 1043

MAGLC (ug/m³): 1794.33

The permittee, having demonstrated that emissions of **toluene** from emissions unit **K001** are calculated to be **less than 80%** of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

- (8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a

“modification”, the permittee shall apply for and obtain a final **PTIO** prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (3) The permittee shall include in the annual Permit Evaluation Report (PER) any changes made to a parameter or value used in the dispersion model, that was used to maintain compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions,

emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

VOC emissions shall not exceed 18.35 lbs/hr.

Applicable Compliance Method

The short term emissions limitation reflects the uncontrolled PTE and was derived by multiplying the maximum VOC content, as applied (5.56 lbs VOC/gal) by the maximum coating usage (3.3 gals/hr).

b. Emission Limitation

VOC content of coatings shall not exceed 5.56 lbs/gal.

Applicable Compliance Method

If required, USEPA Method 24 or formulation data shall be used to determine the VOC/HAP content(s) of each coating and clean up material.

c. Emission Limitation

VOC emissions shall not exceed 21.41 tpy.

Applicable Compliance Method

Compliance with the annual emissions limitation shall be demonstrated by the record keeping and reporting specified in sections d)(1) and e)(2).

g) Miscellaneous Requirements

(1) None.



2. P001, Wood Shop

Operations, Property and/or Equipment Description:

Wood shop including shapers, planer, saws, sanders, controlled by a large diameter cyclone and Aget 14,760 cfm return-air baghouse, and the associated woodwaste load-out.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.01 grain/dscf (gr/dscf) of exhaust gas; 1.27 pounds/hour (lbs/hr); and 5.56 tons/year (tpy). There shall be no visible emissions from the stack serving this emissions unit. Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average during load-out operations. See b)(2)a – b)(2)c
b	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3)
c	OAC rule 3745-17-07(B)	Exempt. See b)(2)d
d	OAC rule 3745-17-08(B)	Exempt. See b)(2)e
e	OAC rule 3745-17-11, Figure II	The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)f

(2) Additional Terms and Conditions

- a. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.
- b. The baghouse shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- c. During any unloading of sawdust into trucks from the cyclone dust collector hopper, every attempt shall be made to reduce or control fugitive dust emissions by minimizing the drop height to the truck, utilizing a truck with high side boards, or placing a covering over the discharge chute during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage silo load-out in excess of 20% opacity, as a 3-minute average.
- d. In accordance with OAC rule 3745-17-07(B)(11)d, OAC rule 3745-17-07(B)(1) shall not apply to any fugitive emissions unit which is exempted from the requirements of OAC rule 3745-17-08(B).
- e. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).
- f. The facility is located in Holmes County. It is exempt from Table I requirements, per OAC rule 3745-17-11 (A)(2)(b).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between **0.5 to 3.0** inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on **weekly** basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
 - a. Emission Limitation
PE shall not exceed 0.01 gr/dscf and 1.27 lbs/hr

Applicable Compliance Method
If required, compliance shall be determined in accordance with USEPA Method 5 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation
PE shall not exceed 5.56 tpy

Applicable Compliance Method

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

$(\text{gr/dscf})(1 \text{ lb}/7000 \text{ gr})(\text{baghouse cfm})(60 \text{ mins/hr})(\text{hrs/yr})(1 \text{ ton}/2000 \text{ lbs})(\text{overall control efficiency of the baghouse})$

c. Emission Limitation

There shall be no visible emissions from the stack serving this emissions unit

Applicable Compliance Method

If required, compliance with this emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 22 of 40 CFR Part 60, Appendix A.

d. Emission Limitation

Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average during load-out operations.

Applicable Compliance Method

If required, compliance with this emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A and the modifications listed in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.



3. P002, Diesel Engine

Operations, Property and/or Equipment Description:

325 HP John Deere PowerTech Model 6081HF070 stationary diesel engine

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(A)(3)	<p>Particulate Emissions (PE)/Particulate Matter (PM) less than 10 microns in diameter (PM-10) shall not exceed 0.72 lb/hr and 3.15 tons/year (tpy).</p> <p>Sulfur Dioxide (SO₂) emissions shall not exceed 0.95 lb/hr and 4.17 tpy See b)(2)a and c)(1) below.</p> <p>Nitrogen Dioxide (NO_x) emissions shall not exceed 3.41 lbs/hr and 4.95 tpy</p> <p>Organic Compound (OC) emissions shall not exceed 0.82 lb/hr and 3.58 tpy</p> <p>Carbon Monoxide (CO) emissions shall not exceed 1.85 lbs/hr and 8.11 tpy</p> <p>Visible PE from the stack serving this emissions unit shall not exceed 10%</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(5)(a).
b	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
c	OAC rule 3745-17-11(B)(5)(a)	PE shall not exceed 0.310 lb/mmBTU.
d	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B)
e	40 CFR Subpart IIII, 60.4200(a)(2)	Exempt. See b)(2)b.

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-31-05(A)(3), best available technology for this emissions unit includes the emission limitations and fuel sulfur content restriction.
- b. Construction for this emissions unit was completed prior to July 11, 2005.

c) Operational Restrictions

- (1) The permittee shall use only diesel fuel/number 2 fuel oil with a maximum sulfur content of 0.5%, by weight, for combustion in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day the permittee burns a fuel other than diesel fuel in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- (2) The permittee shall maintain documentation of the sulfur content of all fuels received.
- (3) The permittee shall perform weekly 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. 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 emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions 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.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Ohio EPA Northeast District Office.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number **d)(3)** above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

- (1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
PE/ PM-10 shall not exceed 0.72 lb/hr and 3.15 tpy

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined by multiplying the (0.00033 lb/hp-hr) emission factor from California Air Resources Board (CARB) Tier 2 Certification for this model year and engine family by the power output rating of this unit (hp).

If required, compliance with the hourly limit shall be determined in accordance with USEPA Methods 1- 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the short term limit (0.72 lb/hr) by (8,760 hours/year) and the conversion factor (1 ton/2000 lbs). Compliance with the annual limit shall be assumed provided the permittee maintains compliance with the hourly limit.

b. Emission Limitation

SO₂ emissions shall not exceed 0.95 lb/hr and 4.17 tpy

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined by the following equation:

$$(0.326 \text{ lb fuel/hp-hr})(325 \text{ hp})(S)(64 \text{ SO}_2/32S)(0.9)$$

Where:

0.326 lb fuel/hp-hr = manufacturers supplied fuel consumption

325hp = maximum rated horsepower

S = percent sulfur in the fuel

64 = molecular mass of sulfur dioxide

32 = molecular mass of sulfur

0.9 = 90% conversion of sulfur to sulfur dioxide

The annual emission limitation was developed by multiplying the short term limit (0.95 lb/hr) by (8,760 hours/year) and the conversion factor (1 ton/2000 lbs). Compliance with the annual limit shall be assumed provided the permittee maintains compliance with the hourly limit.

c. Emission Limitation

NO_x emissions shall not exceed 3.41 lbs/hr and 4.95 tpy

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined by multiplying the (0.0105 lb/hp-hr) emission factor from CARB Tier 2 Certification for this model year and engine family by the power output rating of this unit (hp).

The annual emission limitation was developed by multiplying the short term limit (3.41 lbs/hr) by (8,760 hours/year) and the conversion factor (1 ton/2000 lbs). Compliance with the annual limit shall be assumed provided the permittee maintains compliance with the hourly limit.

d. Emission Limitation

OC emissions shall not exceed 0.82 lb/hr and 3.58 tpy

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined by multiplying the (0.00251 lb-hp-hr) emission factor from AP-42, Table 3.3-1 (10/96) by the power output rating of this emission unit (hp).

The annual emission limitation was developed by multiplying the short term limit (0.82 lb/hr) by (8,760 hours/year) and the conversion factor (1 ton/2000 lbs).

Compliance with the annual limit shall be assumed provided the permittee maintains compliance with the hourly limit.

e. Emission Limitation

CO emissions shall not exceed 1.85 lbs/hr and 8.11 tpy

Applicable Compliance Method

Compliance with the hourly emission limit shall be determined by multiplying the (0.0057 lb/hp-hr) emission factor from CARB Tier 2 Certification for this model year and engine family by the power output rating of this unit (hp).

The annual emission limitation was developed by multiplying the short term limit (1.85 lbs/hr) by (8,760 hours/year) and the conversion factor (1 ton/2000 lbs). Compliance with the annual limit shall be assumed provided the permittee maintains compliance with the hourly limit.

f. Emission Limitation

Visible PE from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method

If required, compliance with this emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g. Emission Limitation

PE shall not exceed 0.310 lb/mmBTU

Applicable Compliance Method

Compliance with this limit shall be determined by the following equation:

$$(0.0022 \text{ lb/hp-hr}) / (\text{hp-hr}/7,000 \text{ BTU})(10^6 \text{ BTU/mmBTU})$$

Where:

$$0.0022 \text{ lb/hp-hr} = \text{emission factor from AP 42, Table 3.3-1 (10/96)}$$

If required, compliance with this limit shall be determined in accordance with USEPA Methods 1- 5 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.