State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

11/20/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-26-00-0160
Sauder Woodworking
JOHN D SCHLATTER
502 MIDDLE STREET
ARCHBOLD, OH 43502

Dear JOHN D SCHLATTER:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging 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 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. 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

If you have any questions, please contact Northwest District Office.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **11/20/02**	Effective Date: **12/11/02**	Expiration Date: **11/20/07**

This document constitutes issuance of a Title V permit for Facility ID: 03-26-00-0160 to:
Sauder Woodworking
502 MIDDLE STREET
ARCHBOLD, OH 43502

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P100 (BAGHOUSE ME # 288 SWC)
PRODUCT DESIGN CENTER AREA K

P200 (BAGHOUSE ME # 2729 SWC)
WEST SILO AREA H

P201 (BAGHOUSE ME # 619 SWC)
CENTER SILO AREA H

P202 (BAGHOUSE ME # 2730 SWC)
EAST SILO AREA H

P203 (BAGHOUSE ME # 1130 SWC)
SAUDER TECHNICAL CENTER AREA P

P204 (BAGHOUSE ME #TBD)
WEST CENTRAL SILO AREA H (NOT YET INSTALLED)

P205 (BAGHOUSE ME #TBD)
CENTER CENTRAL SILO AREA H (NOT YET INSTALLED)

P206 (BAGHOUSE ME #TBD)
EAST CENTRAL SILO AREA H (NOT YET INSTALLED)

P207 (BAGHOUSE ME # 5062-A SWC)
SIFTER AT THE DRY KILN AREA

P300 (BAGHOUSE ME # 1685 SWC)
ELM STREET PLANT AREA C

P301 (BAGHOUSE ME # 1686 SWC)
ELM STREET PLANT AREA C

P302 (BAGHOUSE ME # 2152 SWC)
ELM STREET PLANT AREA C

P303 (BAGHOUSE ME # 3370 SWC)
SAUDER STREET PLANT AREA D

P304 (BAGHOUSE ME # 3371 SWC)
SAUDER STREET PLANT AREA D

P305 (BAGHOUSE ME # 1199 SWC)
SAUDER STREET PLANT AREA D

P306 (BAGHOUSE ME # 1301 SWC)
SAUDER STREET PLANT AREA D

P307 (BAGHOUSE ME # 1596 SWC)
SAUDER STREET PLANT AREA D

P308 (BAGHOUSE ME # 2926 SWC)
SAUDER STREET PLANT COURTYARD AREA F

P309 (BAGHOUSE ME # 2700 SWC)
SAUDER STREET PLANT COURTYARD AREA F

P310 (BAGHOUSE ME # 1073 SWC)
SAUDER STREET PLANT COURTYARD AREA F

P311 (BAGHOUSE ME # 1188 SWC)
SAUDER STREET PLANT COURTYARD AREA F

P312 (BAGHOUSE ME # 1938 SWC)
SAUDER STREET PLANT COURTYARD AREA F

P313 (BAGHOUSE ME #4122 SWC)
SAUDER STREET PLANT AREA D

P314 (BAGHOUSE ME # 4123 SWC)
SAUDER STREET PLANT AREA D

P316 (PAPER CONVERTING)
SAUDER STREET PLANT PAPER CONVERTING PROCESS

P317 (BAGHOUSE ME #TBD)
SAUDER STREET PLANT AREA F (NOT YET INSTALLED)

P318 (BAGHOUSE ME # 1048)
SAUDER STREET PLANT AREA E

P319 (EVERGRAIN LAMINATORS)
SAUDER STREET PLANT EVERGRAIN LAMINATORS

P400 (BAGHOUSE ME # 2951 SWC)
BRUSH CREEK PLANT SOUTH SECTION AREA M

P401 (BAGHOUSE ME # 2946 SWC)
BRUSH CREEK PLANT NORTH SECTION AREA M

P402 (BAGHOUSE ME # 2947 SWC)
BRUSH CREEK PLANT NORTH SECTION AREA M

P403 (BAGHOUSE ME # 2948 SWC)
BRUSH CREEK PLANT NORTH SECTION AREA M

P404 (BAGHOUSE ME # 3250 SWC)
BRUSH CREEK PLANT NORTH SECTION AREA M

P405 (BAGHOUSE ME # 3219 SWC)
BRUSH CREEK PLANT SOUTH SECTION AREA N

P406 (BAGHOUSE ME # 4130 SWC)
BRUSH CREEK PLANT SOUTH SECTION AREA N

P407 (BAGHOUSE ME # 5046)
BRUSH CREEK PLANT SOUTH SECTION AREA N

P408 (BAGHOUSE ME #TBD)
BRUSH CREEK PLANT AREA N (NOT YET INSTALLED)

P500 (BAGHOUSE ME # 1513 SWC)
BARRE ROAD PLANT AREA A

P501 (BAGHOUSE ME # 307 SWC)
BARRE ROAD PLANT AREA A

P502 (BAGHOUSE ME # 381 SWC)
BARRE ROAD PLANT AREA A

P503 (BAGHOUSE ME # 3241 SWC)
BARRE ROAD PLANT AREA B

P504 (BAGHOUSE ME # 3369 SWC)
BARRE ROAD PLANT AREA B

P505 (BAGHOUSE ME # 2176 SWC)
BARRE ROAD PLANT AREA B

P506 (BAGHOUSE ME # 2177 SWC)
BARRE ROAD PLANT AREA B

P507 (BAGHOUSE ME # 2925 SWC)
BARRE ROAD PLANT AREA B

P508 (BAGHOUSE ME #4304 SWC)
BARRE ROAD PLANT AREA B

P509 (BAGHOUSE ME #4613 SWC)
MYERS ROAD PLANT AREA Q

P510 (BAGHOUSE ME #4614 SWC)
MYERS ROAD PLANT AREA Q

P511 (BAGHOUSE ME #4615 SWC)
MYERS ROAD PLANT AREA Q

P512 (LAMINATOR)
MYERS ROAD PLANT LAMINATOR

P513 (HYMMEN LAMINATOR #1)
MYERS ROAD PLANT LAMINATOR (NOT YET INSTALLED)

P514 (BAGHOUSE ME #TBD)
MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

P515 (BAGHOUSE ME #TBD)
MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

P516 (BAGHOUSE ME #TBD)
MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

P517 (BAGHOUSE ME #TBD)
BARRE ROAD AREA B (NOT YET INSTALLED)

P518 (BAGHOUSE ME #TBD)
MYERS ROAD PLANT (NOT YET INSTALLED)

P801 (INKERS)
PLANTWIDE 453 INKERS

P802 (HANDWIPING OPERATIONS)
PLANTWIDE HANDWIPING OPERATIONS

R201 (MAINTENANCE PAINT BOOTH SWC)
LINCOLN STREET ENG/MAINT. PAINT BOOTH

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
ii. **For emission limitations, operational restrictions, and control device operating parameter limitations:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping requirements specified in this permit; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the

deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and

reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. 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 unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as

insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility shall comply with all applicable requirements of 40 CFR Part 63, subpart JJ as well as with all the applicable requirements of subpart A of Part 63 (General Provisions), as identified in Table I of subpart JJ.

2. Work Practice Standards:

2.a This facility shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of 40 CFR Part 63, subpart JJ, section 63.803. The written work practice implementation plan shall be developed in accordance with 40 CFR Part 63, subpart JJ and shall be available for inspection by the Director upon request. If the Director determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of section 63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director may require this facility to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

2.b This facility shall train all new and existing employees, including contract personnel, who are involved in finishing, gluing, cleaning, washoff operations, use of manufacturing equipment, or implementation of the requirements of subpart JJ. All new personnel shall be trained in accordance with 40 CFR Part 63, subpart JJ. All existing personnel shall be trained in accordance with 40 CFR Part 63, subpart JJ. All personnel shall be given refresher training annually. This facility shall maintain a copy of the training program with the work practice implementation plan.

The training program shall include, at a minimum, the following:

i. a list of all current personnel by name and job description that are required to be trained;

ii. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

iii. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

iv. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

A. State and Federally Enforcable Section (continued)

2.c This facility shall prepare, and maintain with the work practice implementation plan, a written leak inspection and maintenance plan that specifies the following:

i. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

ii. an inspection schedule;

iii. methods for documenting the date and results of each inspection and any repairs that were made;

iv. the time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(a) a first attempt at repair (e.g. tightening of packing glands) shall be made no later than (5) five calendar days after the leak is detected; and

(b) final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within (3) three months.

2.d This facility shall develop an organic HAP solvent accounting form to record the following:

i. the quantity and type of organic solvent used each month for washoff and cleaning, as defined in 63.801 of subpart JJ;

ii. the number of pieces washed off, and the reason for the washoff; and

iii. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

2.e This facility shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63, subpart JJ in concentrations subject to MSDS reporting as required by OSHA.

2.f This facility shall not use compounds containing more than 8.0 percent, by weight, of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

2.g This facility shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

A. State and Federally Enforcable Section (continued)

2.h This facility shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

i. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

ii. for touchup and repair under the following conditions:

(a) the touchup and repair occurs after completion of the finishing operations; or

(b) the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

iv. when emissions from the finishing application station are directed to a control device;

v. the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

vi. the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

(a) the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(b) the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

2.i This facility shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

2.j This facility shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

2.k This facility shall prepare, and maintain with the work practice implementation plan a formulation assessement plan that:

i. Identifies VHAP from the list presented in Table 5 of 40 CFR Part 63, subpart JJ that are being used in finishing operations by the affected source.

ii. Establishes a baseline level of usage by the affected source for each VHAP identified in section 63.803(l)(1). The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in section 63.803(l)(1). For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted stryene, which shall be calculated by multiplying that amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined by using the equation in 63.805(d) or (e).

iii. Tracks the annual usage of each VHAP identified in section 63.803(l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

A. State and Federally Enforcable Section (continued)

iv. In accordance with 40 CFR Part 63, subpart JJ, the annual usage of the VHAP identified in section 63.803(l)(1) exceeds its baseline level, then this facility shall provide written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the facility from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(a) the exceedance is no more than 15.0 percent above the baseline;

(b) usage of the VHAP is below the de minimis level presented in Table 5 of subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system), which is determined using the procedures in 63.805(d) or (e);

(c) the affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(d) the source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

v. If none of the above explanations are the reason for the increase, the facility shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility needs to take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

vi. In accordance with 40 CFR Part 63, subpart JJ, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of subpart JJ.

If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph (l)(4)(iv) of section 63.803, then the affected source shall follow the procedures established in section 63.803(l)(5).

3. This facility shall submit a compliance certification with the semiannual report required by 63.807(c). The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

4. Record keeping Requirements:

4.a This facility shall fulfill all record keeping requirements of 63.10 of subpart A, according to the applicability criteria in 63.800(d) of subpart JJ.

A. State and Federally Enforcable Section (continued)

4.b This facility shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

i. records demonstrating that the operator training program required by 63.803(b) is in place;

ii. records collected in accordance with the inspection and maintenance plan required by 63.803(c);

iii. records associated with the cleaning solvent accounting system required by 63.803(d);

iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 63.803(h)(5);

v. records associated with the formulation assessment plan required by 63.803(l); and

vi. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

4.c This facility shall maintain records of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b) and the semiannual reports required by 63.807(c).

4.d This facility shall maintain all records in accordance with the requirements of 63.10(b)(1).

5. Reporting Requirements:

5.a This facility shall fulfill all reporting requirements of 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in 63.800(d) of subpart JJ.

5.b If required, this facility shall provide a written notification under section 63.803(l)(4) of subpart JJ. The notification shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

6. MACT "Hammer" Requirements:

6.a The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Webs (surface coatings), 40 CFR Part 63, Subpart JJJJ. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts. The deadline to submit the Part I application, as specified in 40 CFR Part 63.53, was May 15, 2002.

A. State and Federally Enforcable Section (continued)

6.b If the final MACT standard is not promulgated by May 15, 2004, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted no later than May 15, 2004 [this date may be changed to May 15, 2003 as a result of a settlement between U.S. EPA and the Sierra Club], and must contain the following information:

i. for a new affected source, the anticipated date of startup of operation;

ii. the hazardous air pollutants (HAPs)emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for HAPs from the affected source;

iii. any existing federal, State, or local limitations or requirements applicable to the affected source;

iv. for each affected emission point or group of affected emission points, an identification of control technology in place;

v. information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor; and

vi. any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR Part 63.

The Part II application for a MACT determination may, but is not required to, contain the following information:

i. recommended emission limitations for the affected source and support information. (the permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation);

ii. a description of the control technologies that would be applied to meet the emission limitation, including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied; and

iii. relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.

6.c If the NESHAP is promulgated before May 15, 2004, the facility shall be subject to the rule as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:

i. Within 120 days after promulgation of 40 CFR Part 63, Subpart JJJJ, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report, in accordance with 40 CFR Part 63.9(b)(2):

(a) the name and mailing address of the permittee;

(b) the physical location of the source if it is different from the mailing address;

(c) identification of the relevant MACT standard and the source's compliance date;

(d) a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each HAP; and

(e) a statement confirming the facility is a major source for HAPs.

A. State and Federally Enforcable Section (continued)

ii. Within 60 days following completion of any required compliance demonstration activity specified in 40 CFR Part 63, Subpart JJJJ, the permittee shall submit a notification of compliance status that contains the following information:

(a) the methods used to determine compliance;

(b) the results of any performance tests, visible emission observations, continuous monitoring systems performance evaluations, and/or other monitoring procedures or methods that were conducted;

(c) the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

(d) the type and quantity of HAPs emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart JJJJ;

(e) an analysis demonstrating whether the affected source is a major source or an area source;

(f) a description of the air pollution control equipment or method for each emission point, including each control device or method for each HAP and the control efficiency (percent) for each control device or method; and

(g) a statement of whether or not the permittee has complied with the requirements of 40 CFR Part 63, Subpart JJJJ.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B301-oil heater; P315-Hymmen laminator; Z100-air makeup unit RFA-1 PD; Z101-RFA-2 PD air makeup unit; Z104-incidental gluing; Z201-ME RFM-1 air makeup unit; Z202-RFG-1 air makeup unit; Z203-R&D small lab spray booth; Z204-R&D powder coat spray booth; Z205-R&D powder coat spray booth oven; Z206-hot water boiler; Z207-natural gas V8 emergency generator; Z208-5 horse power circulation pump; Z210-miscellaneous emergency generator; Z303-ES RFE-3 air makeup unit; Z304-ES RSF-1 air makeup unit; Z305-ES RSF-2 air makeup unit; Z306-ES RFS-3 air makeup unit; Z307-ES RFS-4 air makeup unit; Z308-ES RFS-5 air makeup unit; Z309-ES RFS-6 air makeup unit; Z310-ES RFS-7 air makeup unit; Z311-ES RFS-8 air makeup unit; Z312-ES RFS-9 air makeup unit; Z313-ES RFS-10 air makeup unit; Z314-ES RFS-11 air makeup unit; Z315-ES RFW-1 air makeup unit; Z316-ES RFW-2 air makeup unit; Z317-ES RFW-3 air makeup unit; Z318-ES RFW-4 air makeup unit; Z319-ES RFW-5 air makeup unit; Z320-ES RFW-1 air makeup unit; Z322-ES RFS-12 air makeup unit; Z323-ES RFS-13 air makeup unit; Z324-ES RFS-14 air makeup unit; Z325-ES RFE-1 air makeup unit; Z326-ES RFE-2 air makeup unit; Z327-LR RFW-7 air makeup unit; Z328-LR RFW-8 air makeup unit; Z329-LR RFW-9 air makeup unit; Z330-LR RFW-10 air makeup unit; Z401-BC RFJ-1 air makeup unit; Z402-BC RFJ-3 air makeup unit; Z403-BC RFJ-5 air makeup unit; Z502-BR RFF-1 air makeup unit; Z503-BR RFF-2 air makeup unit; Z504-BR RFF-3 air makeup unit; Z505-BR RFF-4 air makeup unit; Z506-BR RFF-5 air makeup unit; Z507-BR RFF-6 air makeup unit; Z508-BR RFO-1 air makeup unit; Z509-BR RFO-2 air makeup unit; Z510-BR RFO-3 air makeup unit; Z511-BR RFO-4 air makeup unit; Z512-BR RFO-5 air makeup unit, Z513-BR RFO-6 air makeup unit; Z514-BR RFO-7 air makeup unit; Z515-BR RFO-8 air makeup unit; Z516-BR RFF-7 air makeup unit; Z517-insta-fill foam in place; and Z518-cross cut saw.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 288 SWC (P100)

Activity Description: PRODUCT DESIGN CENTER AREA K

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 20,280-acfm baghouse (ME #288)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.09 lbs PE/hr, 4.75 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 0.78 lb PM10/hr, 3.42 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.09 lbs PE/hr, 4.75 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (30,160 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.78 lb PM10/hr, 3.42 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (30,160 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2729 SWC (P200)

Activity Description: WEST SILO AREA H

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 20,280-acfm baghouse (ME #2729)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	0.73 lb of particulate emissions (PE)/hr, 3.20 TPY PE 0.52 lb of particulate matter less than 10 microns (PM10)/hr, 2.28 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR Part 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

V. Testing Requirements (continued)

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10, Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.73 lbs PE/hr, 3.20 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.52 lb PM10/hr, 2.28 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 619 SWC (P201)

Activity Description: CENTER SILO AREA H

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 24,128-acfm baghouse (ME #619)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 0.87 lbs PE/hr, 3.80 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 0.62 lb PM10/hr, 2.72 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.87 lbs PE/hr, 3.80 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (24,128 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.62 lb PM10/hr, 2.72 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (24,128 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2730 SWC (P202)

Activity Description: EAST SILO AREA H

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 20,280-acfm baghouse (ME #2730)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	0.73 lb of particulate emissions (PE)/hr, 3.20 TPY PE 0.52 lb of particulate matter less than 10 microns (PM10)/hr, 2.28 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

V. Testing Requirements (continued)

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.73 lb PE/hr, 3.20 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.52 lb PM10/hr, 2.28 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1130 SWC (P203)

Activity Description: SAUDER TECHNICAL CENTER AREA P

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 12,000-acfm baghouse (ME #1130)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 0.43 lbs PE/hr, 1.89 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 0.31 lb PM10/hr, 1.36 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.43 lbs PE/hr, 1.89 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (12,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.31 lb PM10/hr, 1.36 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (12,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P204)

Activity Description: WEST CENTRAL SILO AREA H (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 20,280-acfm baghouse (west central silo area H)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	0.73 lb of particulate emissions (PE)/hr, 3.20 TPY PE 0.52 lb of particulate matter less than 10 microns (PM10)/hr, 2.28 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.73 lb PE/hr, 3.20 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.52 lb PM10/hr, 2.28 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P205)

Activity Description: CENTER CENTRAL SILO AREA H (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 24,128-acfm baghouse (Center Central Silo Area H)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	0.87 lb of particulate emissions (PE)/hr, 3.81 TPY PE 0.62 lb of particulate matter less than 10 microns (PM10)/hr, 2.72 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.87 lb PE/hr, 3.81 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (24,128 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.62 lb PM10/hr, 2.72 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (24,128 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P206)

Activity Description: EAST CENTRAL SILO AREA H (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 20,280-acfm baghouse (East Central Silo Area H)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	0.73 lb of particulate emissions (PE)/hr, 3.20 TPY PE 0.52 lb of particulate matter less than 10 microns (PM10)/hr, 2.28 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.73 lb PE/hr, 3.20 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.52 lb PM10/hr, 2.28 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 5062-A SWC (P207)

Activity Description: SIFTER AT THE DRY KILN AREA

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wood waste storage silo system consisting of collection points, duct work and a 4000-acfm baghouse (ME #5062-A)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13489)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 0.14 lb PE/hr, 0.61 TPY P 0.0030 grain (gr) of particulate matter less than 10 microns (PM10), 0.103 lb PM10/hr, 0.45 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the wood waste storage silo system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13489, issued on November 1, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13489, issued on November 1, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.14 lb PE/hr, 0.61 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (4000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.103 lb PM10/hr, 0.45 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (4000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the wood waste storage silo system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1685 SWC (P300)

Activity Description: ELM STREET PLANT AREA C

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #1685)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1686 SWC (P301)

Activity Description: ELM STREET PLANT AREA C

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #1686)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2152 SWC (P302)

Activity Description: ELM STREET PLANT AREA C

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #2152)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.59 lbs PE/hr, 11.35 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3370 SWC (P303)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #3370)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3371 SWC (P304)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #3371)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1199 SWC (P305)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #1199)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1301 SWC (P306)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #1301)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1596 SWC (P307)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #1596)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2926 SWC (P308)

Activity Description: SAUDER STREET PLANT COURTYARD AREA F

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #2926)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2700 SWC (P309)

Activity Description: SAUDER STREET PLANT COURTYARD AREA F

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #2700)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1073 SWC (P310)

Activity Description: SAUDER STREET PLANT COURTYARD AREA F

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #1073)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1188 SWC (P311)

Activity Description: SAUDER STREET PLANT COURTYARD AREA F

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #1188)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.59 lbs PE/hr, 11.35 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1938 SWC (P312)

Activity Description: SAUDER STREET PLANT COURTYARD AREA F

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #1938)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.59 lbs PE/hr, 11.35 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #4122 SWC (P313)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #4122)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 4123 SWC (P314)

Activity Description: SAUDER STREET PLANT AREA D

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #4123)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: PAPER CONVERTING (P316)

Activity Description: SAUDER STREET PLANT PAPER CONVERTING PROCESS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paper converting operation (continuous paper web)	OAC rule 3745-21-09(F)	2.9 lbs of volatile organic compounds (VOC)/gal of coating, excluding water and exempt solvents
	40 CFR Part 63, Subpart B	See Part II - A.6.
	OAC rule 3745-31-05(A)(3) (PTI #03-13519)	emissions from coatings/adhesives: 1.50 lbs organic compounds (OC)/hr & 6.6 tons OC/yr emissions from cleanup: 7.9 tons OC/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and 40 CFR, Part 63, Subpart B.

2. Additional Terms and Conditions

2.a The hourly OC emission limitation was established for PTI purposes and represents the potential to emit for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each coating/adhesive employed;

b. the OC content of each coating/adhesive employed, in pounds per gallon;

c. the VOC content of each coating/adhesive employed (excluding water and exempt solvents), in pounds per gallon, as applied;

d. the number of gallons of each coating/adhesive employed;

e. the OC emission rate for each coating/adhesive employed (b x d), in pounds;

f. the total OC emission rate for all the coatings/adhesives employed (summation of e for all coatings/adhesives, divided by 2000), in tons; and

g. the annual, year-to-date OC emission rate for all the coatings/adhesives employed (summation of f for each calendar month to date from January to December), in tons.

2. The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. the OC content of each cleanup material employed, in pounds per gallon;

c. the number of gallons of each cleanup material employed;

d. the OC emission rate for each cleanup material employed (b x c), in pounds;

e. the total OC emission rate for all the cleanup materials employed, (summation of d for all cleanup materials, divided by 2000), in tons; and

f. the annual, year-to-date OC emission rate for all the cleanup materials employed (summation of e for each calender month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations: 1.50 lbs OC/hr & 6.6 tons OC/yr, from coatings/adhesives

Applicable Compliance Method:
The hourly allowable OC emission limitation was established by multiplying the maximum OC content of all the coatings (0.005 lb OC/lb coating/adhesive) by the maximum usage rate of all the coatings/adhesives (300 lbs/hr).

If required, compliance with the hourly allowable OC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements specified in condition A.III.1.of this permit.

1.b Emission Limitation: 7.9 tons OC/yr, from cleanup materials usage

Applicable Compliance Method: Compliance with the annual emission limitation shall be determined by the record keeping requirements specified in condition A.III.2 of this permit

1.c Emission Limitation: 2.9 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. This emissions unit is not subject to the Ohio EPA's Air Toxic Policy as this emissions unit was installed prior to May 1986.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P317)

Activity Description: SAUDER STREET PLANT AREA F (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Sauder Street area F)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lb PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1048 (P318)

Activity Description: SAUDER STREET PLANT AREA E

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 3744-acfm baghouse (ME #1048)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 0.14 lbs PE/hr, 0.59 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 0.096 lb PM10/hr, 0.42 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 0.14 lbs PE/hr, 0.59 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (3744 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 0.096 lb PM10/hr, 0.42 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (3744 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: EVERGRAIN LAMINATORS (P319)

Activity Description: SAUDER STREET PLANT EVERGRAIN LAMINATORS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Evergrain laminators	OAC rule 3745-21-07(G)	none (See A.II.1.)
	40 CFR, Part 63, Subpart JJ	none (See A.I.2.a.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13519)	emissions from adhesives: 1.38 lbs organic compounds (OC)/hr & 6.0 tons OC/yr emissions from cleanup: 1.0 ton OC/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and 40 CFR, Part 63, Subpart JJ.

2. Additional Terms and Conditions

2.a According to the permittee, this emissions unit, as presently operated, does not employ any coating or contact adhesive as defined in 40 CFR, Part 63, Subpart JJ, and thus, is not subject to any of the requirements established pursuant to 40 CFR, Part 63, Subpart JJ. The permittee shall not use any coating or contact adhesive in this emissions unit without complying with all the applicable requirements of 40 CFR, Part 63, Subpart JJ.

2.b The hourly OC emission limitation was established for PTI purposes and represents the potential to emit for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each adhesive employed;

b. the OC content of each adhesive employed, in pounds/gallon;

c. documentation on whether or not each material employed is a photochemically reactive material;

d. the number of gallons of each adhesive employed;

e. the OC emission rate for each adhesive employed (b x d), in pounds;

f. the total OC emission rate for all the adhesives employed (summation of e for all adhesives, divided by 2000), in tons; and

g. the annual, year-to-date OC emission rate for all the adhesives employed (summation of f for each calendar month to date from January to December), in tons.

2. The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. the OC content of each cleanup material employed, in pounds per gallon;

c. documentation on whether or not each material employed is a photochemically reactive material;

d. the number of gallons of each cleanup material employed;

e. the OC emission rate for each cleanup material employed (b x d), in pounds;

f. the total OC emission rate for all the cleanup materials employed (summation of e for all cleanup materials), in tons; and,

g. the annual, year-to-date OC emission rate for all the cleanup materials employed (summation of e for each calendar month to date from January to December), in tons.

IV. Reporting Requirements

1. The permitttee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations: 1.38 lbs OC/hr & 6.0 tons OC/yr, from adhesives

Applicable Compliance Method:
The hourly allowable OC emission limitation was established by multiplying the maximum OC content of all the coatings (0.0005 lb OC/lb coating/adhesive) by the maximum usage rate of all the coatings/adhesives (2500 lbs/hr).

If required, compliance with the hourly allowable OC emission limitation shall be demonstrated in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements specified in condition A.III.1.of this permit.

1.b Emission Limitation: 1.0 ton OC/yr, from cleanup materials

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in section A.III.2. of this permit.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Evergrain laminators	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's annual emissions increase (as a result this modification), for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2951 SWC (P400)

Activity Description: BRUSH CREEK PLANT SOUTH SECTION AREA M

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000 acfm baghouse (ME #2951)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	1.80 lbs of particulate emissions (PE)/hr, 7.88 TPY PE 1.29 lbs of particulate matter less than 10 microns (PM10)/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2946 SWC (P401)

Activity Description: BRUSH CREEK PLANT NORTH SECTION AREA M

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #2946)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2947 SWC (P402)

Activity Description: BRUSH CREEK PLANT NORTH SECTION AREA M

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #2947)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2948 SWC (P403)

Activity Description: BRUSH CREEK PLANT NORTH SECTION AREA M

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #2948)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3250 SWC (P404)

Activity Description: BRUSH CREEK PLANT NORTH SECTION AREA M

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #3250)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3219 SWC (P405)

Activity Description: BRUSH CREEK PLANT SOUTH SECTION AREA N

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000 acfm baghouse (ME #3219)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	1.80 lbs of particulate emissions (PE)/hr, 7.88 TPY PE 1.29 lbs of particulate matter less than 10 microns (PM10)/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 4130 SWC (P406)

Activity Description: BRUSH CREEK PLANT SOUTH SECTION AREA N

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #4130)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 0.0030 grains (gr) of particulate matter less than 10 microns (PM10)/dry standard cubic foot (dscf), 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 5046 (P407)

Activity Description: BRUSH CREEK PLANT SOUTH SECTION AREA N

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #5046)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13201)	2.59 lbs of particulate emissions (PE)/hr, 11.35 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.11 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.11 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P408)

Activity Description: BRUSH CREEK PLANT AREA N (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Brush Creek area N)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 1513 SWC (P500)

Activity Description: BARRE ROAD PLANT AREA A

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #1513)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lb PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13347, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 307 SWC (P501)

Activity Description: BARRE ROAD PLANT AREA A

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #307)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lb PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 381 SWC (P502)

Activity Description: BARRE ROAD PLANT AREA A

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (ME #381)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 1.80 lbs PE/hr, 7.88 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.29 lb PM10/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3241 SWC (P503)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000 acfm baghouse (ME #3241)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	1.80 lbs of particulate emissions (PE)/hr, 7.88 TPY PE 1.29 lbs of particulate matter less than 10 microns (PM10)/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lbs PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 3369 SWC (P504)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #3369)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2176 SWC (P505)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #2176)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.59 lbs PE/hr, 11.35 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2177 SWC (P506)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #2177)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.59 lbs PE/hr, 11.35 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13447, issued on November 2, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME # 2925 SWC (P507)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #2925)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #4304 SWC (P508)

Activity Description: BARRE ROAD PLANT AREA B

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000 acfm baghouse (ME #4304)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13508, issued on December 4, 2001: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #4613 SWC (P509)

Activity Description: MYERS ROAD PLANT AREA Q

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #4613)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13201)	2.59 lbs of particulate emissions (PE)/hr, 11.35 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #4614 SWC (P510)

Activity Description: MYERS ROAD PLANT AREA Q

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #4614)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13201)	2.59 lbs of particulate emissions (PE)/hr, 11.35 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #4615 SWC (P511)

Activity Description: MYERS ROAD PLANT AREA Q

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (ME #4615)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13201)	2.59 lbs of particulate emissions (PE)/hr, 11.35 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grain PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13201, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.35 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lbs PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: LAMINATOR (P512)

Activity Description: MYERS ROAD PLANT LAMINATOR

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Hymmen laminator #2	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13201)	0.36 lb of organic compounds (OC)/hr, 1.6 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the company identification for each liquid organic material employed in this emissions unit; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permitee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each resin employed;

b. the number of gallons of each resin employed;

c. the OC content of each resin, in lbs/gallon;

d. the total OC emission rate* for all resins, in lbs/month; and

e. the year-to-date, emissions for the calendar year, in tons.

*It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process and is not emitted to the atmosphere. Therefore, the emission rate for each resin is equal to the number of gallons times the OC content times a unitless factor of 0.1.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. 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:

1.a Emission Limitation: 0.36 lb OC/hr

Applicable Compliance Method: The hourly OC limit is based on the emissions unit's potential to emit.* Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.

*The potential to emit for this emissions unit was determined by multiplying the maximum usage rate of 59.5 gallons of coating per hour, times the maximum OC content of 0.06 lb/gallon and an emission factor of 0.1 (see condition A.III.2).

1.b Emission Limitation:1.6 TPY of OC

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limitation using the record keeping specified in section A.III.2.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: HYMMEN LAMINATOR #1 (P513)

Activity Description: MYERS ROAD PLANT LAMINATOR (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Hymmen laminator #1 (roller type adhesive applicator with 2,976 acfm ventilation system)	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	0.014 lb of volatile organic compounds (OC)/hr, 0.06 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the company identification for each liquid organic material employed in this emissions unit; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permitee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each resin employed;

b. the number of gallons of each resin employed;

c. the OC content of each resin, in lbs/gallon;

d. the total OC emission rate* for all resins, in lbs/month; and

e. the year-to-date, emissions for the calendar year, in tons.

*It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process and is not emitted to the atmosphere. Therefore, the emission rate for each resin is equal to the number of gallons times the OC content times a unitless factor of 0.1.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: 0.014 lb OC/hr

Applicable Compliance Method: The hourly OC limit is based on the emissions unit's historical potential to emit.* Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.

*The potential emit for this emissions unit was determined by taking the historical worst case scenario maximum ambient concentration of OC** (1 ppm) in the room that this emissions unit is in, converting from ppm to pounds per cubic foot by the flow rate of the roof vent (2976 acfm) and then multiplying by 60 minutes/hour.

**The OC emissions are solely in the form of formaldehyde.

1.b Emission Limitation: 0.06 TPY OC

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limitation using the record keeping specified in section A.III.2.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined in OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require a permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P514)

Activity Description: MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Meyers Road Plant South)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lb PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P515)

Activity Description: MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Meyers Road Plant South)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf and 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lb PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P516)

Activity Description: MYERS ROAD PLANT SOUTH (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Meyers Road Plant South)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lb PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P517)

Activity Description: BARRE ROAD AREA B (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 72,000-acfm baghouse (Barre Road Area B)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	2.59 lbs of particulate emissions (PE)/hr, 11.34 TPY PE 1.85 lbs of particulate matter less than 10 microns (PM10)/hr, 8.10 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 2.59 lbs PE/hr, 11.34 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.85 lb PM10/hr, 8.10 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BAGHOUSE ME #TBD (P518)

Activity Description: MYERS ROAD PLANT (NOT YET INSTALLED)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic wood waste handling system consisting of collection points, duct work and a 50,000-acfm baghouse (Meyers Road Plant)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	1.80 lbs of particulate emissions (PE)/hr, 7.88 TPY PE 1.29 lbs of particulate matter less than 10 microns (PM10)/hr, 5.65 TPY PM10 opacity restrictions (See A.I.2.c.) See A.I.2.d.
	40 CFR 52.21 OAC rules 3745-31-10 through 20	0.0042 gr PE/dscf, 0.0030 gr PM10/dscf (See A.I.2.e.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

2.c Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

2.d The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rules 3745-31-10 through 20.

2. Additional Terms and Conditions (continued)

2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grain PM10/dscf from the wood waste handling system.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. 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 eliminate the visible emissions.

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13380, issued on June 27, 2002: paragraph 1. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

2. The permittee shall submit semiannual written reports which (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 appropriate Ohio District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

1.a The emissions testing shall be conducted within 6 months prior to permit renewal.

V. Testing Requirements (continued)

1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

1.d 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, Northwest 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 tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

1.e Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, 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.

1.f A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

2. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

2.a Emissions Limitation: 0.0042 gr PE/dscf, 1.80 lbs PE/hr, 7.88 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate may be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

V. Testing Requirements (continued)

2.b Emissions Limitation: 0.0030 gr PM10/dscf, 1.29 lb PM10/hr, 5.65 TPY PM10

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0030 gr PM10/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

2.c Emissions Limitation: Visible particulate emissions from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to Method 9 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The preventative maintenance and malfunction abatement plan/system and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: INKERS (P801)

Activity Description: PLANTWIDE 453 INKERS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
453 inkers (roller type stain applicators with fugitive emissions to building air)	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13380)	6.80 lbs organic compounds (OC)/hr, 29.90 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and 40 CFR, Part 63.802(a)(1).
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The permittee shall only use stains in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the company identification for each liquid organic material employed in this emissions unit; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

2. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:

III. Monitoring and/or Record Keeping Requirements (continued)

2.a a certified product data sheet for each stain (certified product data sheet defined in 40 CFR 63.801); and

2.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

2. The permittee shall submit semi-annual compliance certification reports to the Director as required by 40 CFR Part 63, Subpart 63.807(c), that that the following information:

2.a A statement that compliant stains have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

2.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.

3. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations as required below:

3.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual useage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide information required by Part II, section A.2.k.iv.

3.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.v.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: 6.80 lbs OC/hr

Applicable Compliance Method: The hourly OC limit is based on the emissions unit's potential to emit.* Therefore, no daily record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.

*The potential emit for this emissions unit was determined by taking the historical, worst case emission rate of 0.015 lb OC/hour/inker and multiplying that by the total number of inkers (453).

1.b Emission Limitation: 29.90 TPY OC

Applicable Compliance Method: The annual limitation was developed by multiplying the hourly limitation by 8760 and then dividing by 2000. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.c Emission Limitation: stains - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.2 and section A.V.2.

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Director that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined in OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require a permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: HANDWIPING OPERATIONS (P802)

Activity Description: PLANTWIDE HANDWIPING OPERATIONS

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
plant wide hand application of stain (production operations)	OAC rule 3745-21-07(G)	none (See A.II.1.)
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.I.2.a.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13519)	15.4 tons organic compounds (OC)/yı The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and 40 CFR, Part 63.802(a)(1).

2. Additional Terms and Conditions

2.a The permittee shall only use stains in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:

1.a a certified product data sheet for each stain (certified product data sheet defined in 40 CFR 63.801); and

1.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification for each stain employed;

b. the OC content of each stain employed, in pounds per gallon;

c. documentation on whether or not each material employed is a photochemically reactive material;

d. the number of gallons of each stain employed;

e. the OC emission rate for each stain employed (b x d), in pounds;

f. the total OC emission rate for all the stains employed (summation of e for all stains, divided by 2000), in tons; and

g. the annual, year-to-date OC emission rate for all the stains employed (summation of f for each calendar month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports to the Director, as required by 40 CFR, Part 63, Subpart 63.807(c), that include a statement that only compliant stains have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

2. Written notifications for annual VHAP usage exceedances (in accordance with 40 CFR Part 63, subpart JJ) pertaining to the formulation assessment plan for finishing operations as required below:

2.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual useage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide information required by Part II, section A.2.k.iv.

2.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, A.2.k.vi. The written notification shall provide information required by Part II, A.2.k.vi.

If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.

3. The permitttee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

4. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance wtih the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation: stains - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with the VHAP content limitation above by using the record keeping requirements specified in section A.III.2 and section A.V.2 of this permit.

1.b Emission Limitation: 15.4 tons OC/yr

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation shall be determined by the record keeping requirements specified in section A.III.2 of this permit.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Director to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC/OC Content Analysis by Reference Method 24," EPA-340/1-91-010.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: MAINTENANCE PAINT BOOTH SWC (R201)

Activity Description: LINCOLN STREET ENG/MAINT. PAINT BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
maintenance paint booth	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as otherwise provided by rule.
	OAC rule 3745-17-11(B)	See A.I.2.a.
	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-21-09(U)(2)(e)(iii)	See A.I.2.a.
	OAC rule 3745-31-05(A)(3) (PTI #03-13509)	for coatings usage: 93.6 lbs organic compounds (OC)/day, 17.1 tons OC/yr 2.15 lbs particulate emissions (PE)/hr, 9.4 tons PE/year (See A.I.2.b.) The maximum daily coating usage shall not exceed 10 gallons of coating in any one day for the coating of metal and nonmetal parts. for cleanup materials usage: 147.2 lbs OC/month, 0.88 ton OC/yr See A.I.2.c.

2. Additional Terms and Conditions

2.a The requirement under this applicable rule is less stringent than that established pursuant to OAC rule 3745-31-05 (A)(3).

2.b All PE is assumed to be particulate matter less than 10 microns in size (PM10).

2. Additional Terms and Conditions (continued)

2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-21-07.

2.d The 93.6 lbs OC/day emission limitation was established for PTI purposes to reflect the emission unit's potential to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The use of any photochemically reactive material, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited for the coating of nonmetal parts and for cleanup materials.

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating usage in this emissions unit:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The total volume, in gallons, of all the coatings employed.

2. The permittee shall collect and record the following information each month for the coating usage in this emissions unit:

a. The name and identification number of each coating employed.

b. The volume, in gallons, of each coating employed.

c. The OC content of each coating, in pounds per gallon.

d. The OC emission rate for each coating employed, in pounds (b x c).

e. The total OC emission rate from all the coatings employed, in pounds (summation of d for all coatings).

f. The year-to-date OC emissions from all the coatings employed (summation of e for coatings for each calendar month to date).

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for the cleanup material usage in this emissions unit:

a. The company identification for each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The OC content of each cleanup material, in pounds per gallon.

d. The OC emission rate from each cleanup material employed, in pounds [b x c] .*

e. The total OC emission rate from all the cleanup materials employed, in pounds (summation of d for all cleanup materials).*

f. The year-to-date OC emissions from all the cleanup materials employed (summation of e for all the cleanup materials for each calendar month to date).

*The company may calculate OC emissions from the cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

4. On days when coating non-metal parts and/or cleanup materials are used, the permittee shall maintain records of the following information for this emissions unit:

a. the company identification for each liquid organic material employed in this emissions unit; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limitation of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was used for the coating of nonmetal parts and each day during which a photochemically reactive material was used for cleanup operations. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit deviation (excursion) reports that identify any exceedance of the OC emission limitation (form cleanup materials usage) of 147.2 pounds. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined according to the following methods:

1.a Emission Limitations: Coatings - 93.6 lbs OC/day & 17.1 tons OC/yr

Applicable Compliance Method:
The daily allowable OC emission limitation was established by multiplying the maximum OC content of all the coatings (lbs/gallon) by the maximum coating usage rate (gallons/day).

The permittee shall demonstrate compliance with the annual allowable OC emission limitation above in accordance with the record keeping requirements specified in section A.III.2 of this permit.

1.b Emission Limitation: 2.15 lbs PE/hr

Applicable Compliance Method: The permittee may demonstrate compliance with the hourly allowable PE limitation by employing the following equation:

E = PE rate (lbs/hr)

E = maximum coating solids usage (lbs/hr) x (1 - TE) (1 - CE)

where,

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 50 percent)

CE = control efficiency of the control equipment (assumed to be 95 percent)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60 Appendix A, Methods 1 - 5.

1.c Emission Limitation: 9.4 tons PE/yr

Applicable Compliance Method:
Provided compliance is shown with the hourly PE limitation, compliance with the annual PE limitation shall be ensured (the annual limitation was developed by multiplying the hourly limitation by 8,760, and then dividing by 2,000).

1.d Emission Limitation: less than 10 gallons of coating/day

Applicable Compliance Method: The permittee shall demonstrate compliance with the coating usage restriction above in accordance with the record keeping requirements specified in A.III.1 of this permit.

1.e Emission Limitations: Cleanup - 147.2 lbs OC/month & 0.88 ton OC/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the monthly and annual allowable OC emission limitations above in accordance with the record keeping requirements in section A.III.3 of this permit.

1.f Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as otherwise proved by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above pursuant to OAC rule 3745-17-03 (B)(1).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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