



Environmental Protection Agency

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

4/17/2012

Mr. Bryan Coblentz
Winesburg Hardwood Lumber Co LLC
2871 US 62
Dundee, OH 44624

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238002007
Permit Number: P0109381
Permit Type: Initial Installation
County: Holmes

Certified Mail

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

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Winesburg Hardwood Lumber Co LLC**

Facility ID:	0238002007
Permit Number:	P0109381
Permit Type:	Initial Installation
Issued:	4/17/2012
Effective:	4/17/2012
Expiration:	4/17/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Winesburg Hardwood Lumber Co LLC

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Authorization

Facility ID: 0238002007
Application Number(s): A0043525, A0043635
Permit Number: P0109381
Permit Description: Initial PTIO for installation and operation of one wood-fired industrial boiler, two stationary diesel engines and a tub grinder.
Permit Type: Initial Installation
Permit Fee: \$2,500.00
Issue Date: 4/17/2012
Effective Date: 4/17/2012
Expiration Date: 4/17/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Winesburg Hardwood Lumber Co LLC
2871 US Rte 62
Dundee, OH 44624

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

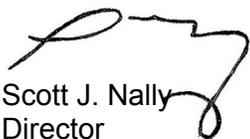
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109381

Permit Description: Initial PTIO for installation and operation of one wood-fired industrial boiler, two stationary diesel engines and a tub grinder.

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

- Emissions Unit ID: B001**
Company Equipment ID: Boiler #1
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P001**
Company Equipment ID: Diesel Engine #1 (Pallet)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P002**
Company Equipment ID: Diesel Engine #2 (Mill)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID: P005**
Company Equipment ID: Tub Grinder #1
Superseded Permit Number:
General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
 - c) The Ohio EPA has determined that the Winesburg Hardwood Lumber Company is subject to the requirements of the area source MACT/GACT for stationary reciprocating internal combustion engines (RICE) (40 CFR Part 63, Subpart ZZZZ). Ohio EPA does not have the delegated authority to implement this rule. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with this rule are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website:

<http://www.epa.gov/ttn/atw/area/arearules.html>

C. Emissions Unit Terms and Conditions



1. B001, Boiler #1

Operations, Property and/or Equipment Description:

3.01 MMBtu/hr wood-fired boiler that supplies hot water for process and space heating.

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

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

a. d)(3)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-03(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) shall not exceed 0.99 pound per hour and 4.35 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.81 pounds per hour and 7.92 tons per year.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.66 pound per hour and 2.90 tons per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).</p> <p>See b)(2)a.</p>



b.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(F)	See d)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-10(C)(2)	PE shall not exceed 0.60 lb/MMBtu of actual heat input. The requirements of this rule are less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
f.	OAC rule 3745-18-06(B)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of CO, NO_x and PE specified in b)(1)a from this air contaminant source since the uncontrolled potentials to emit for the emissions of CO, NO_x and PE are less than 10 tons per year.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The operations log required in d)(1) above shall be maintained on site.
- (3) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The

permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

- (3) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term d)(1) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

PE shall not exceed 0.99 pound per hour and 4.35 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable PE emission limit shall be demonstrated by multiplying the PE emission factor of 0.33 lb/MMBtu [AP-42, Table 1.6-2, (9/03)] by the emissions unit's maximum rated capacity of 3.01 MMBtu/hr.

If required, compliance with the hourly emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8). Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.99 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitations:

CO emissions shall not exceed 1.81 pounds per hour and 7.92 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable CO emission limit shall be demonstrated by multiplying the CO emission factor of 0.60 lb/MMBtu [AP-42, Table 1.6-2, (9/03)] by the emissions unit's maximum rated capacity of 3.01 MMBtu/hr.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 10 or 10B, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (1.81 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

c. Emission Limitations:

NO_x emissions shall not exceed 0.66 pound per hour and 2.90 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable NO_x emission limit shall be demonstrated by multiplying the NO_x emission factor of 0.22 lb/MMBtu [AP-42, Table 1.6-2, (9/03)] by the emissions unit's maximum rated capacity of 3.01 MMBtu/hr.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (0.66 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

d. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

e. Emission Limitation:

PE shall not exceed 0.60 lb/MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.



2. P001, Diesel Engine #1 (Pallet)

Operations, Property and/or Equipment Description:

400 BHP, Cummins, Model NTC-400, Stationary RICE used as a primary power source for the Pallet Shop.

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

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

a. d)(6)

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

a. b)(1)d, b)(2)d, c)(2), d)(2), d(3), e)(2) and f)(1)h

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-03(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.88 pound per hour and 1.77 tons per year. Carbon monoxide (CO) emissions shall not exceed 2.67 pounds per hour and 5.38 tons per year. Organic compounds (OC) emissions shall not exceed 1.01 pounds per hour and 2.01 tons per year. See b)(2)a, b)(2)b and c)(2). The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(5)(b).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	ORC 3704.03(T)	Nitrogen oxides (NO _x) emissions shall not exceed 12.40 pounds per hour. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) as effective December 1, 2006	See b)(2)c.
d.	OAC rule 3745-31-05(D)(1)(b), Synthetic Minor to avoid Title V	Facility-wide NO _x emissions shall not exceed 77.6 tons per rolling, 12-month period. See b)(2)d, c)(2) and c)(3).
e.	ORC 3704.03(F)	See d)(6).
f.	OAC rule 3745-17-07(A)	Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
g.	OAC rule 3745-17-11(B)(5)(b)	The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.
h.	OAC rule 3745-18-06(G)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 pound per MMBtu of actual heat input.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. The hourly allowable emission limitations for PE, NO_x, CO and OC reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these hourly allowable emission limitations. The annual allowable emission limitations for PE, CO and OC are based on the maximum hourly allowable emission limitation multiplied by the maximum annual operating hours' limitation. Therefore, the record keeping and/or reporting requirements for the annual

operating hours limitation is sufficient to ensure compliance with these annual allowable emission limitations.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of CO, OC and PE from this air contaminant source since the uncontrolled potentials to emit for the emissions of CO, OC and PE are less than 10 tons per year.

- d. The facility-wide NO_x emissions shall not exceed 77.6 tons per year, based upon a rolling, 12-month summation of the monthly NO_x emissions from emissions units P001, P002 and P005, combined. This federally enforceable limitation is based on the maximum annual operating hours under c)(2) of this permit, and is being established for the purposes of avoiding Title V major source applicability.

c) **Operational Restrictions**

- (1) This emissions unit shall be operated with No. 2 Ultra Low Sulfur Diesel Fuel (0.0015% max.).
- (2) The maximum annual operating hours for this emissions unit shall not exceed 4016, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	335
1-2	670
1-3	1005
1-4	1340
1-5	1675
1-6	2010
1-7	2345
1-8	2680
1-9	3015

1-10	3350
1-11	3685
1-12	4016

After the first 12 calendar months of operation or the first 12 calendar months following this issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
- (2) The permittee shall record the following information each month for each emissions unit:
 - a. the total operating time, in hours; and
 - b. the rolling, 12-month summation of the monthly operating time, in hours.
- (3) The permittee shall record the following information each month for emissions units P001, P002 and P005, combined:
 - a. the total NO_x emissions, in tons; and
 - b. the rolling, 12-month summation of NO_x emissions, in tons.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) The operations log required in d)(4) above shall be maintained on site.
 - (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for each emissions unit;
 - ii. all exceedances of the rolling, 12-month emission limitation for NO_x;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(4) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

PE shall not exceed 0.88 pound per hour and 1.77 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE emission limit shall be demonstrated by multiplying the PE emission factor of 0.0022 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8). Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.88 lb/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitations:

CO emissions shall not exceed 2.67 pounds per hour and 5.38 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable CO emission limit shall be demonstrated by multiplying the CO emission factor of 0.0067 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 10 or 10B, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable CO limitation (2.67 lbs/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

c. Emission Limitations:

NO_x emissions shall not exceed 12.40 pounds per hour.

Applicable Compliance Methods:

Compliance with the hourly allowable NO_x emission limit shall be demonstrated by multiplying the NO_x emission factor of 0.0310 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitations:

OC emissions shall not exceed 1.01 pounds per hour and 2.01 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable OC emission limit shall be demonstrated by multiplying the OC emission factor of 0.0025 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable OC limitation (1.01 lbs/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

e. Emission Limitation:

Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation:

The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

SO₂ emissions shall not exceed 0.5 pound per MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

h. Emissions Limitation:

Facility-wide NO_x emissions shall not exceed 77.6 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual NO_x emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements specified in d).

- g) Miscellaneous Requirements
 - (1) None.



3. P002, Diesel Engine #2 (Mill)

Operations, Property and/or Equipment Description:

400 BHP, Cummins, Model NTC-400, Stationary RICE used as a primary power source for the Mill.

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

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

a. d)(6)

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

a. b)(1)c, b)(2)b, c)(2), d)(3), d)(4), e)(2) and f)(1)h

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 0.88 pound per hour and 1.77 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.67 pounds per hour and 5.38 tons per year.</p> <p>Organic compounds (OC) emissions shall not exceed 1.01 pounds per hour and 2.01 tons per year.</p> <p>See b)(2)a and c)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(5)(b).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	ORC 3704.03(T)	Nitrogen oxides (NO _x) emissions shall not exceed 12.40 pounds per hour. See b)(2)a.
c.	OAC rule 3745-31-05(D)(1)(b), Synthetic Minor to avoid Title V	Facility-wide NO _x emissions shall not exceed 77.6 tons per rolling, 12-month period. See b)(2)b, c)(2) and c)(3).
d.	ORC 3704.03(F)	See d)(6).
e.	OAC rule 3745-17-07(A)	Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-11(B)(5)(b)	The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.
g.	OAC rule 3745-18-06(G)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 pounds per MMBtu of actual heat input.

(2) Additional Terms and Conditions

- a. The hourly allowable emission limitations for PE, NO_x, CO and OC reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these hourly allowable emission limitations. The annual allowable emission limitations for PE, CO and OC are based on the maximum hourly allowable emission limitation multiplied by the maximum annual operating hours' limitation. Therefore, the record keeping and/or reporting requirements for the annual operating hours limitation is sufficient to ensure compliance with these annual allowable emission limitations.
- b. The facility-wide NO_x emissions shall not exceed 77.6 tons per year, based upon a rolling, 12-month summation of the monthly NO_x emissions from emissions units P001, P002 and P005, combined. This federally enforceable limitation is based on the maximum annual operating hours under c)(2) of this permit, and is being established for the purposes of avoiding Title V major source applicability.

c) Operational Restrictions

- (1) This emissions unit shall be operated with No. 2 Ultra Low Sulfur Diesel Fuel (0.0015% max.).



- (2) The maximum annual operating hours for this emissions unit shall not exceed 4016, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	335
1-2	670
1-3	1005
1-4	1340
1-5	1675
1-6	2010
1-7	2345
1-8	2680
1-9	3015
1-10	3350
1-11	3685
1-12	4016

After the first 12 calendar months of operation or the first 12 calendar months following this issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
- (2) The permittee shall record the following information each month for each emissions unit:
 - a. the total operating time, in hours; and
 - b. the rolling, 12-month summation of the monthly operating time, in hours.

- (3) The permittee shall record the following information each month for emissions units P001, P002 and P005, combined:
- a. the total NO_x emissions, in tons; and
 - b. the rolling, 12-month summation of NO_x emissions, in tons.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) The operations log required in d)(4) above shall be maintained on site.
- (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for each emissions unit;
 - ii. all exceedances of the rolling, 12-month emission limitation for NO_x;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

PE shall not exceed 0.88 pound per hour and 1.77 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE emission limit shall be demonstrated by multiplying the PE emission factor of 0.0022 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8). Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.88 lb/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitations:

CO emissions shall not exceed 2.67 pounds per hour and 5.38 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable CO emission limit shall be demonstrated by multiplying the CO emission factor of 0.0067 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 10 or 10B, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable CO limitation (2.67 lbs/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

c. Emission Limitation:

NO_x emissions shall not exceed 12.40 pounds per hour.

Applicable Compliance Methods:

Compliance with the hourly allowable NO_x emission limit shall be demonstrated by multiplying the NO_x emission factor of 0.0310 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. Emission Limitations:

OC emissions shall not exceed 1.01 pounds per hour and 2.01 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable OC emission limit shall be demonstrated by multiplying the OC emission factor of 0.0025 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 400 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable OC limitation (1.01 lbs/hr) by the maximum allowable annual hours of operation (4,016 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

e. Emission Limitation:

Visible PE from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

f. Emission Limitation:

The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

g. Emission Limitation:

SO₂ emissions shall not exceed 0.5 pounds per MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

h. Emissions Limitation:

Facility-wide NO_x emissions shall not exceed 77.6 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual NO_x emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements specified in d).

g) Miscellaneous Requirements

- (1) None.

4. P005, Tub Grinder #1

Operations, Property and/or Equipment Description:

Dura-Tech, Model HD10, portable tub grinder for processing of wood waste from mill and pallet shop with 300 HP diesel engine.

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

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

a. d)(8)

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

a. b)(1)c, b)(2)f, c)(2), d)(6), d)(7), e)(2) and f)(1)h

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The particulate emissions (PE) from the tub grinder portion of this emissions unit shall not exceed 4.90 pounds per hour and 13.12 tons per year.</p> <p>Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.</p> <p>Emissions from the diesel engine shall not exceed the following rates:</p> <p>PE shall not exceed 0.66 pound per hour and 1.77 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 2.01 pounds per hour and 5.38 tons per year.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Organic compounds (OC) emissions shall not exceed 0.75 pound per hour and 2.01 tons per year. See b)(2)a, b)(2)b and c)(2). The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-11(B)(5)(b).
b.	ORC 3704.03(T)	Nitrogen oxides (NO _x) emissions shall not exceed 9.30 pounds per hour. See b)(2)c.
c.	OAC rule 3745-31-05(D)(1)(b), Synthetic Minor to avoid Title V	Facility-wide NO _x emissions shall not exceed 77.6 tons per rolling, 12-month period. See b)(2)c, c)(2) and c)(3).
d.	ORC 3704.03(F)	See d)(8).
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the diesel engine exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-17-07(B)(1)	Exempt. See b)(2)d.
g.	OAC rule 3745-17-08(B)	Exempt. See b)(2)e.
h.	OAC rule 3745-17-11(B)(5)(b)	The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.
i.	OAC rule 3745-18-06(B)	Stationary internal combustion engines which have rated heat input capacities equal to, or less than, ten MM Btu per hour total rated capacity are exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code.

(2) Additional Terms and Conditions

- a. This emissions unit shall not cause a nuisance per Ohio Administrative Code (OAC) rule 3745-15-07.
- b. The hourly allowable emission limitation for PE for the tub grinder and the hourly allowable emission limitations for PE, NO_x, CO and OC for the tub grinder's diesel engine reflect the potentials to emit for this emissions unit. Therefore, it is

not necessary to develop record keeping and/or reporting requirements to ensure compliance with these hourly allowable emission limitations. The annual allowable emission limitation for PE for the tub grinder and the annual allowable emission limitations for PE, CO and OC for the tub grinder's diesel engine are based on the maximum hourly allowable emission limitation multiplied by the maximum annual operating hours' limitation. Therefore, the record keeping and/or reporting requirements for the annual operating hour limitation is sufficient to ensure compliance with these annual allowable emission limitations.

- c. The facility-wide NO_x emissions shall not exceed 77.6 tons per year, based upon a rolling, 12-month summation of the monthly NO_x emissions from emissions units P001, P002 and P005, combined. This federally enforceable limitation is based on the maximum annual operating hours under c)(2) of this permit, and is being established for the purposes of avoiding Title V major source applicability.
- d. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-07(B)(11)(e), this emissions unit is exempt from the requirements of OAC rule 3745-17-07(B).
- e. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08(A)(1), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) **Operational Restrictions**

- (1) This emissions unit shall be operated with No. 2 Ultra Low Sulfur Diesel Fuel (0.0015% max.).
- (2) The maximum annual operating hours for this emissions unit shall not exceed 5355, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	447
1-2	894
1-3	1341
1-4	1788
1-5	2235
1-6	2682



1-7	3129
1-8	3576
1-9	4023
1-10	4470
1-11	4917
1-12	5355

After the first 12 calendar months of operation or the first 12 calendar months following this issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the grinding and material handling operations in accordance with the following frequencies:

<u>grinding and material handling operations</u>	<u>minimum inspection frequency</u>
All	Each day of operation

The purpose of the inspections is to determine the need for implementing the above-mentioned additional control measures for emissions of fugitive dust. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for this grinding and material handling operation if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements, including ORC 3704.03(T).

- (2) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall maintain a record of the sulfur content of each shipment of diesel fuel received for burning in this emissions unit.
- (4) The permittee shall record the following information each month for each emissions unit:
 - a. the total operating time, in hours; and
 - b. the rolling, 12-month summation of the monthly operating time, in hours.

- (5) The permittee shall record the following information each month for emissions units P001, P002 and P005, combined:
- the total NO_x emissions, in tons; and
 - the rolling, 12-month summation of NO_x emissions, in tons.
- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emissions incident; and
 - any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The operations log required in d)(7) above shall be maintained on site.
- (8) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month restriction on the hours of operation for each emissions unit;
 - ii. all exceedances of the rolling, 12-month emission limitation for NO_x;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The PE from the tub grinder portion of this emissions unit shall not exceed 4.90 pounds per hour and 13.12 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE emission limit shall be demonstrated by multiplying the PE emission factor of 0.35 lb/ton (Ohio EPA RACM Table 2.17-1) by the emissions unit's maximum rated capacity of 14 tons/hr.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (4.90 lbs/hr) by the maximum allowable annual hours of operation (5,355 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this limitation through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

c. Emission Limitations:

PE from the diesel engine shall not exceed 0.66 pound per hour and 1.77 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable PE emission limit shall be demonstrated by multiplying the PE emission factor of 0.0022 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 300 hp.

If required, compliance with the hourly emission limitation shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(8). Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.66 lb/hr) by the maximum allowable annual hours of operation (5,355 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

d. Emission Limitations:

CO emissions from the diesel engine shall not exceed 2.01 pounds per hour and 5.38 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable CO emission limit shall be demonstrated by multiplying the CO emission factor of 0.0067 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 300 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 10 or 10B, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable CO limitation (2.01 lbs/hr) by the maximum allowable annual hours of operation (5,355 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

e. Emission Limitation:

NO_x emissions shall not exceed 9.30 pounds per hour.

Applicable Compliance Methods:

Compliance with the hourly allowable NO_x emission limit shall be demonstrated by multiplying the NO_x emission factor of 0.0310 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 300 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

f. Emission Limitations:

OC emissions from the diesel engine shall not exceed 0.75 pound per hour and 2.01 tons per year.

Applicable Compliance Methods:

Compliance with the hourly allowable OC emission limit shall be demonstrated by multiplying the OC emission factor of 0.0025 lb/hp-hr [AP-42, Table 3.3-1, (10/96)] by the emissions unit's maximum rated capacity of 300 hp.

If required, compliance with the hourly emission limitation shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and either 25 or 25A, as appropriate. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable OC limitation (0.75 lb/hr) by the maximum allowable annual hours of operation (5,355 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g. Emission Limitation:

The PE from the diesel engine's exhaust shall not exceed 0.310 pound per MMBtu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative EPA-approved test methods may be used with prior approval from the Ohio EPA.

h. Emission Limitation:

Facility-wide NO_x emissions shall not exceed 77.6 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual NO_x emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements specified in d).

g) Miscellaneous Requirements

- (1) None.