OhioEPA
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Holmes County
Application No: 02-9768

CERTIFIED MAIL

RECEIVED
APR 29 1996
OHIO EPA NEDO

April 24, 1996

MILLER LUMBER COMPANY
ALVIN MILLER
7101 STATE ROUTE 39
MILLERSBURG, OH 44654

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review 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 Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 02-9768
APS Premise No. 0238000119
Permit Fee: $100.00

Name of Facility: MILLER LUMBER COMPANY

Person to Contact: ALVIN MILLER

Address: 7101 STATE ROUTE 39
MILLERSBURG, OH 44654

Location of proposed source(s): 7101 STATE ROUTE 39
MILLERSBURG, OHIO

Description of proposed source(s):
267 HP (8.92 MMBTU/HR) G & S MILL, WOOD FIRED, STOKER BOILER
.

Date of Issuance: April 24, 1996

Effective Date: April 24, 1996

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for MILLER LUMBER COMPANY located in Holmes County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
B008	267 HP, (8.92 MMBTU/hr) G & S mill wood fired stoker boiler with multiclone mechanical collector	Restrict boiler to wood and wood waste fuel only, PM emissions limited to 0.6 lb/MMBTU heat input stack emissions test for PM and SO_2 required at startup, and use of multiclone mechanical collect or for particulate control.	3745-31-05 3745-17-07 3745-17-10 (C) 3745-15-07 3745-15-06 3745-18-04	PM - 0.6 lb/MMBTU 23.44 TPY SO_2 - 0.207 lb/hr or 0.90 TPY NO_x - 3.74 lbs/hr or 16.4 TPY CO - 14.1 lbs/hr or 61.8 TPY PM_{10} -0.19lb/MMBTU or 7.50 TPY

5.35 lbs/hr

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
Particulates	23.44
SO_2	0.90
NO_x	16.4
CO	61.8
PM_{10}	7.50

CONSTRUCTION STATUS

The OEPA Northeast District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: B008, G & S mill 267 HP wood fired boiler.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A) APPLICABLE STATE REGULATIONS:

The following rules of the Ohio Administrative Code (OAC) establish the applicable emission limitations and/or control requirements of this source:

OAC Rule 3745-17-07(A)
OAC Rule 3745-17-10(C)
OAC Rule 3745-18-04(E)&(F)
OAC Rule 3745-15-06
OAC Rule 3745-15-07

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

B) ALLOWABLE EMISSIONS LIMITS:

1. Per OAC Rule 3745-17-10(C)(2), Figure I, Curve P-2, the particulate emissions from this source shall not exceed 0.60 pound per million Btu (mmBtu) of heat input. Annual total particulate emissions shall not exceed 23.44 tons per year.

2. The annual total PM_{10} emissions shall not exceed 7.50 tons per year.

3. Sulfur dioxide (SO_2) emissions from this source shall not exceed 0.90 tons per year.

C) EMISSIONS CONTROL EQUIPMENT:

This wood waste fired boiler shall be equipped with a multiclone mechanical collector for the express purpose of controlling the particulate emissions from this source. This multiclone particulate collector shall be used at all times that this boiler is in operation.

The multiclone collector shall be cleaned periodically and maintained in accordance with good engineering practices and manufacturers recommendations. A records of the dates and details of all cleaning and maintenance of this multiclone collector shall be kept in the boiler operating log.

D) GENERAL SOURCE OPERATING RESTRICTIONS:

1. The maximum heat input to this source shall not exceed 8.92 mmBtu per hour, the maximum rated capacity of this boiler.

2. The fuel used to fire this boiler shall be restricted to wood and/or wood waste ONLY.

3. The use of flyash reinjection in this source is prohibited.

4. This source shall employ an overfire air system which is designed, maintained, and operated in accordance with good engineering practices and which minimizes visible emissions.

5. The multiclone collector to be installed on this boiler shall be utilized for particulate emissions control at all times that this source is in operation.

E) PARTICULATE/VISIBLE EMISSION RESTRICTIONS:

This source shall comply with OAC Rule 3745-17-07(A), which limits visible particulate emissions as follows:

1. except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average; and

2. visible particulate emissions from the stack may exceed twenty (20) percent as a six-minute average for not more than six (6) consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity at any time.

The visible particulate emission limitations specified above shall not apply to the following operations, provided the operations are documented in a boiler operations log kept at the facility:

a) the start-up of the source for a period of time required to achieve stable combustion conditions, but no more than three (3) hours from the moment of start-up. "Start-up" means the commencement of firing of fuel from a cold non-fired condition;

b) the shutdown of the source for a period of not more than six (6) hours;

c) the malfunction of the source or associated equipment, if the owner of the source or operator of the equipment complies with the requirements of OAC Rule 3745-15-06;

d) intermittent soot-blowing operations (the cleaning of heat transfer surfaces with pressurized air or steam);

e) intermittent ash removal operations (the dumping or pulling of ash); and

f) the commencement of increased wood and/or wood waste firing from a banked condition for a period not to exceed thirty (30) minutes. "Banked condition" means the condition where the fuel is burned on the grates at rates which are sufficient to maintain ignition only.

This boiler operations log shall clearly document the date, beginning time, and ending time of the exempted operations listed above.

F) FUEL ANALYSIS REQUIREMENTS:

Prior to initial startup of this boiler, and periodically thereafter as required by the Director, Miller Lumber Company (or any subsequent owner/operator of this facility) shall be required to obtain a representative composite sample of the

wood and/or wood waste being used as fuel in this source and analyze such sample for heat content (Btu per pound), ash content, and sulfur content. All analyses values shall be reported on an as-burned and dry basis. Such sampling and analyses shall be performed by appropriate ASTM methodology or by other methods acceptable to, and approved by, the Director. This wood fuel analysis shall be submitted to the Ohio EPA, Northeast District Office, for review.

G) RECORDKEEPING REQUIREMENTS:

This facility shall maintain the following records related to the operation of this source:

1. an operations log in which shall be recorded the daily total number of hours of operation of this source, the number of hours of banked operation, the times of ash removal and soot blowing, and the date and time of any equipment malfunction which results in excessive emissions (plume opacity) from this source;

2. the weekly total volume and density of the wood/wood waste burned in this boiler;

3. the results of all required fuel analyses of the wood/wood waste burned in this boiler;

4. the dates and details of all cleaning and maintenance performed on the multiclone collector.

These records, as well as any other supporting analyses and computations, shall be retained on site in facility files for a period of not less than three (3) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

H) SOURCE START-UP TESTING REQUIREMENTS:

Prior to the issuance of a Permit to Operate for this source, and within six (6) months of the initial startup of this boiler, the permittee shall conduct, or have conducted, performance/emissions testing of this source in accordance with procedures approved by the Ohio EPA. Two copies of the written test report shall be submitted to the Agency within thirty days of the completion of these tests. This test report shall be signed by the person responsible for the test and shall describe the test procedures followed and the results of such tests. The Director, or an Ohio EPA representative, shall be allowed to witness the tests, examine the testing equipment, and require the acquisition or submission of data and information necessary to assure that source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment:

1. a completed Intent to Test form shall be submitted to the Ohio EPA, Northeast District Office, where the original PTI application was filed at least thirty (30) days in advance of the scheduled test and shall specify the operation parameters, the proposed test procedures, the pollutants to be tested for, and the time, date, place, and person(s) conducting such tests;

2. two copies of the test results shall be submitted to the Ohio EPA, Northeast District Office, within thirty (30) days after completion of the performance test; and

3. the performance/emissions tests conducted on this source shall specifically be performed for particulates and sulfur dioxide.

All reports and/or communications required by these terms and conditions shall be sent to:

Ohio Environmental Protection Agency
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087.