

STAFF DETERMINATION FOR THE APPLICATION  
TO CONSTRUCT UNDER THE FEDERAL PREVENTION OF SIGNIFICANT  
DETERIORATION REGULATIONS FOR THE INSTALLATION OF ADDITIONAL  
546,688 ACFM OF WOODWASTE HANDLING CAPACITY AND ASSOCIATED  
INKING AND LAMINATING PROCESSES FOR SAUDER WOODWORKING  
COMPANY, PTI NO. 03-13380, OF 502 MIDDLE STREET, ARCHBOLD, FULTON  
COUNTY, OHIO

October 17, 2000

Ohio Environmental Protection Agency  
Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215

### Facility Description

The Sauder Woodworking Company located at its woodworking facility located at 502 Middle Street, Archbold, Fulton County, Ohio is proposing to construct additional sawing and edge banding equipment, boring and board cleaning equipment, and soft forming and end caper equipment with 10 pneumatic wood waste handling systems (two at 20,280 acfm, one at 24,128 acfm, one at 50,000 acfm, and six at 72,000) to control saw dust emissions. Sauder Woodworking is also proposing to install a

Sauder processes large sheets of raw fiberboard by laminating them with various laminators. The laminated fiber boards are then cut, shaped, sanded, counter banded, edged, and inked as needed. The saw dust generated from these operations is transferred to silos at the Co-Generation facility for combustion or load-out. Sauder also produces shipping corrugated boxes, foaming packing material, and other packaging paper products. Particulate matter emitted from the packaging area are collected and routed to an internally venting baghouse.

### New Source Review (NSR)/PSD Applicability

Sauder is classified as a "major" stationary source because its potential particulate emissions, excluding fugitive emissions, exceed 250 tons per year in an attainment area. The city of Archbold, Ohio, where these emissions units will be installed and modified is located in Fulton County and is an attainment area for all criteria pollutants. Per the PSD regulations, once a source emits a regulated pollutant that triggers a major modification at a major source level emissions, a PSD analysis is required. In addition, all pollutants which will be emitted at a rate in excess of the significance levels would also require the facility to perform a PSD analysis for those pollutants. Table 1 shows the emissions from the proposed modification.

Table 1, Net Emissions from the Proposed Installation

Pollutant	Maximum Emissions of Pollutant Emission Sources (TPY) <sup>1</sup>	Significant Level (TPY)	Significant Emissions Increase
PM	69.8	25	yes
PM <sub>10</sub>	69.8	15	yes
SO <sub>2</sub>	0.0	40	no
NO <sub>x</sub>	0.0	40	no
CO	0.0	100	no
VOC	25.6	40	no
Pb (lead)	0.0	0.6	no
HAP	0.0	N/A	-
HAPs	0.0	N/A	-

<sup>1</sup>Based upon the above information, PSD review is required for PM and PM<sub>10</sub>.

Sauder is subject to the MACT standard under 40 CFR Part 63, Subpart JJ- Wood Furniture Manufacturing Operations. However, since the proposed laminator is not classified as a contact adhesive (it utilizes heat and pressure to bond the laminate to the substrate) no MACT emissions limits are applicable to the proposed modifications.

#### Control Technology Review

The proposed project at Sauder is subject to PSD regulations which mandate that a case-by case Best Available Control Technology (BACT) analysis be performed for the following significant pollutants: PM and PM<sub>10</sub>. The application did not use a complete "top-down" approach to determine an appropriate level of control because Sauder has agreed to use baghouses with 99% control efficiency and effluent grain loading limits of 0.0042 grains PM per dry standard cubic foot and 0.00023 grains PM<sub>10</sub> per dry standard cubic foot.

While the application did not discuss a "top-down" approach to determine an appropriate level of control, it referenced the September 1999 application that described the types of control equipment which can be used to control particulate matter. Control equipment which can be used to control particulate matter are cyclones, electrostatic precipitators, venturi scrubbers, packed tower scrubbers, and baghouses. Because Sauder and Ohio EPA consider baghouses to be "top-of-the-line" control technology, no further discussion was given citing EPA's "New Source Review Workshop Manual" page B.8. which states that "an applicant proposing the top control alternative need not provide cost and other detailed information in regard to other control options".

#### Site Description/Air Quality Designations

Sauder is located at 502 Middle Street, Archbold, Fulton County, Ohio. Under Section 107 of the Clean Air Act (CAA) as of June 24, 1992, the area which contains Fulton

County was classified as attainment for all of the criteria pollutants, i.e., particulate matter less than 10 microns, sulfur dioxide, nitrogen dioxide, carbon monoxide, volatile organic compounds (ozone) and lead.

#### Ambient Air Quality Monitoring Requirements

Sauder is located in Fulton County which is in Air Quality Control Region (AQCR) 177. The area is attainment or attainment/unclassifiable for particulate matter less than 10 microns (PM<sub>10</sub>), sulfur dioxide, nitrogen dioxide, carbon monoxide, volatile organic compounds (ozone) and lead.

The project will exceed the PSD significant emission rate for PM<sub>10</sub>. U.S. EPA regulations require a year of ambient air quality data to be obtained as part of the PSD application. An applicant may conduct monitoring on-site, model to demonstrate a "De Minimis" impact, or use existing air quality data to fulfill some of the requirements of a PSD ambient air quality analysis. If monitoring is required, U.S. EPA has set up specific conditions on the acceptability of existing air quality monitors to ensure the monitor is representative of air quality in this area.

In this instance, Ohio EPA has identified existing ambient data which it judged to be representative of the current PM<sub>10</sub> air quality within the impact area; therefore, Sauder would not be required to conduct pre-application monitoring. Table 2, below summarizes the predicted impact concentrations versus the De Minimus pre-application monitoring concentrations.

Table 2, Predicted Impact Versus De Minimus Pre-application Monitoring Concentrations

Monitoring Pollutant	Averaging Period	Predicted Impact Concentration	De Minimus Concentration	De Minimus?
PM <sub>10</sub>	24-hour	19.01 ug/m <sup>3</sup>	10 ug/m <sup>3</sup>	no
	Annual	2.31 ug/m <sup>3</sup>	N/A	N/A

The proposed project would have PM<sub>10</sub> emissions increases exceeding the PSD significant emission rates and predicted ambient impact concentrations greater than the De Minimus Concentrations. This triggers the requirement for air quality modeling to assess the potential impact of the proposed project.

### Modeling

The facility was evaluated using the ISCST3 model (version 99155). Toledo/Flint (1985-1987, 1990-1991, the most recent, available data on the Ohio EPA web page) meteorological data were used. Rural mode and regulatory default were assumed.

The maximum 24-hours and annual average PM<sub>10</sub> concentrations due to the project were 19.01 ug/m<sup>3</sup> and 2.31 ug/m<sup>3</sup>, respectively. These values are above the PSD PM<sub>10</sub> significant impact increments. Therefore, additional modeling to determine if the project will cause or contribute to violations of the NAAQS or PSD increments is necessary.

### PSD Increment Analysis

All areas surrounding Sauder are Class II PSD areas. The increment analysis was performed by modeling all potentially interacting increment-consuming or expanding sources, including those at Sauder.

Results of the PSD modeling are that the PM<sub>10</sub>- CTSCREEN/h6h 5-year ISC model shows the peak annual concentrations of 3.51 ug/m<sup>3</sup> and the high-sixth-high concentration over the five year period of 28.68 PM<sub>10</sub>.

The PSD impacts are below the full federal PSD Class II increments for PM<sub>10</sub>. PM<sub>10</sub> is above the Ohio EPA ½ increment policy. The areas exceeding ½ of the PSD increment are limited to the peaks of three hills near the facility. In fact, the peak concentrations are occurring on plant property. The absolute magnitude of the impacts are not considered to be unacceptable and the areal extent of the area exceeding the ½ PSD increment is considered to be acceptable.

Each of the total peak impacts of the pollutant increases due to the proposed project and existing PSD sources were below the acceptable incremental impacts.

### NAAQS Analysis

NAAQS analyses were performed to determine the combined impact of the entire Sauder facility combined with all potentially interacting facilities. Background values provided by Ohio EPA were used to account for the impacts of minor sources and more distant sources not explicitly included in the modeling analysis.

The peak NAAQS impacts, including background, are: PM<sub>10</sub> - The high-sixth-high 24-hour concentration over five years 5-years was 141.72 ug/m<sup>3</sup>. The peak annual concentration was 42.9 ug/m<sup>3</sup>. The background values used are: PM<sub>10</sub> - 24-hour and annual; 61 ug/m<sup>3</sup> and 23 ug/m<sup>3</sup>, respectively.

While peak impacts for each of the criteria pollutants are below each of their respective

ambient standards, there appears to be little additional margin available. The current modeling analyses were performed at emission rates which exceed the new permitted allowables. The emission rates included in the modeling were based on previous emission estimates. More recent stack test data show a smaller fraction of fine particulate than was originally assumed and have allowed the facility to accept lower allowable emission rates. This means that the modeling analyses are conservative relative to the allowed emission rates.

### BACT Review

As discussed in above, PSD regulations require a BACT analysis for pollutants regulated under the CAA that are emitted in quantities exceeding pollutant-specific threshold values. The regulated pollutant associated with this proposed project emitted in significant quantities is PM<sub>10</sub>.

The BACT requirement is defined as "an emission limitation (including a visible emissions standard) based on the maximum reduction for each pollutant subject to regulation under the CAA, which would be emitted from any proposed major stationary source or major modification that the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable..."(EPA 1990b). The BACT analysis, previously submitted in September 1999 as part of an earlier PSD construction permit application, demonstrated that BACT requirements are met by the woodwaste handling systems which contain baghouses with PM<sub>10</sub> control efficiency of 99% and effluent grain loading limits of 0.0042 grains PM per dry standard cubic foot and 0.00023 grains PM<sub>10</sub> per dry standard cubic foot.

This BACT analysis is not based on a complete "top-down" approach because Sauder has proposed to use woodwaste handling systems that contain baghouses with PM<sub>10</sub> control efficiency of 99% and effluent grain loading limits of 0.0042 grains PM per dry standard cubic foot and 0.00023 grains PM<sub>10</sub> per dry standard cubic foot. These baghouses are considered "top-of-the-line" controls. This is consistent with the draft top-down BACT guidance document issued by EPA on March 15, 1990, which is reflected in EPA's draft *New Source Review Workshop Manual* (EPA 1990b).

In the "top-down" methodology, available control technology options are identified based on knowledge of the source and previous regulatory decisions for other identical or similar sources. These options are then ranked in order of control effectiveness, the "top" option being most stringent. The feasibility or appropriateness of each option as BACT is based on technical feasibility and economic, energy, and environmental impacts. If the top control option is technically infeasible or is otherwise rejected as inappropriate after considering site-specific impacts, it is rejected and the next most stringent option is then considered. This process continues until a control option is determined to be technically feasible and without adverse economic, energy, and environmental impact. If the company chooses to implement the top option for control,

then no further top-down analysis is required. The top option is then selected as BACT.

The following resources were reviewed, to verify that the woodwaste handling systems that contain baghouses with PM<sub>10</sub> control efficiency of 99% still "top-of-the-line" saw dust control technology:

- ◆ Air pollution regulatory control agencies with PSD determinations in their region;
- ◆ EPA's RACT/BACT/LAER Clearinghouse (RBLC);
- ◆ Other BACT analyses for woodwaste handling sources;
- ◆ Technical journals;
- ◆ Publications of professional associations.

The RBLC database, made available through EPA's OAQPS Technology Transfer Network, lists technologies that have previously been approved as BACT. Previous BACT determinations were identified for woodwaste handling systems and the associated production activities.

#### Secondary Impact

The company has demonstrated that the predicted pollutant concentrations throughout the study area are below the secondary NAAQS. Since the secondary NAAQS are designed to limit the amount of pollutants emitted into the ambient air that would have an adverse impact on human welfare, soils and vegetation. No sensitive plant species were identified within Sauder's impact area. Therefore, no significant adverse impact on human welfare, soils and vegetation is anticipated due to the proposed modification.

#### Conclusions

Based upon the analysis of the permit to install application and its supporting documentation provided by Sauder, the Ohio EPA staff has determined that the proposed installation will comply with all applicable State and Federal environmental regulations and that the requirements for BACT are satisfied. The Ohio EPA staff recommends that a permit to install be issued to the Sauder Woodworking Company.

State of Ohio Environmental Protection Agency



RE: DRAFT PERMIT TO INSTALL

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.  
Center

FULTON COUNTY

Application No: 03-13380

DATE: 10/17/2000

Sauder Woodworking Company  
Everett Crawford  
800 W Barre Rd  
Archbold, OH 43502

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA  
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Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Terms and Conditions**

**DRAFT PERMIT TO INSTALL 03-13380**

Application Number: 03-13380  
APS Premise Number: 0326000160  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Sauder Woodworking Company  
Person to Contact: Everett Crawford  
Address: 800 W Barre Rd  
Archbold, OH 43502

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**502 Middle St.**  
**Archbold, Ohio**

Description of proposed emissions unit(s):  
**7-woodwaste handling systems, 4-woodwaste silos, 1-Hymmen laminators and 453 inkers.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13380

Issued: To be entered upon final issuance

**Part I - GENERAL TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **5. Severability Clause**

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## **7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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**10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
  
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **6. Construction of New Sources(s)**

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### **7. 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.

#### **8. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### **9. Best Available Technology**

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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.

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**10. 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
PE	86.13
PM <sub>10</sub>	4.66
OC	29.96

**Sauder Woodworking Company**

**Facility ID: 0326000160**

**PTI Application: 03-13380**

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P204 - Pneumatic (20,280 acfm) wood waste handling system (west central silo area H)	OAC rule 3745-31-05(A)(3)	0.73 lb PE/hr
		0.040 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21	0.0042 gr PE/dscf, 3.20 TPY PE
	OAC rule 3745-31-10 through 3745-31-20	(see A.I.2.e.) 0.00023 gr PM <sub>10</sub> /dscf, 0.18 TPY PM <sub>10</sub>

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through 3745-31-20.
- 2.c This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule

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3745-17-11 is not applicable.

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

**Sauder Woodworking Company**

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**Issued: To be entered upon final issuance**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.)
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the

**Sauder Woodworking Company**  
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**Issued: To be entered upon final issuance**

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person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
- a. Emissions Limitation: 0.0042 gr PE/dscf, 0.73 lb PE/hr, 3.20 TPY PE

Applicable Compliance Method:  
 Compliance with the PE outlet concentration

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

- b. Emissions Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.040 lb PM<sub>10</sub>/hr, 0.18 TPY PM<sub>10</sub>

Applicable Compliance Method:  
 Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity

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**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: Visible emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
 Environmental Appeals Board  
 401 M Street, SW (MC-113do)  
 Washington, D.C. 21460

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**  
**B. State Only Enforceable Section**

**Facility ID: 0326000160**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P204 - Pneumatic (20,280 acfm) wood waste handling system (west central silo area H)		

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Sauder Woodworking Company**

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**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

Saude  
PTI A

Emissions Unit ID: P205

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P205 - Pneumatic (24,128 acfm) wood waste handling system (center central silo area H)	OAC rule 3745-31-05(A)(3)	0.87 lb PE/hr
		0.048 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
OAC rule 3745-17-11	None (see A.I.2.d.)	
40 CFR 52.21	OAC rule 3745-31-10 through	0.0042 gr PE/dscf, 3.81 TPY PE
3745-31-20	(see A.I.2.e.)	0.00023 gr PM <sub>10</sub> /dscf, 0.21 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

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3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

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Emissions Unit ID: P205

**Issued: To be entered upon final issuance**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent

Emissions Unit ID: P205

to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
    - a. Emissions Limitation: 0.0042 gr PE/dscf, 0.87 lb PE/hr, 3.81 TPY PE

Applicable Compliance Method:

Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by

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Issued: To be entered upon final issuance

Emissions Unit ID: P205

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

- b. Emissions Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.048 lb PM<sub>10</sub>/hr, 0.21 TPY PM<sub>10</sub>

Applicable Compliance Method:

Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (24,128 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the

**Saude****PTI A****Issued: To be entered upon final issuance**

Emissions Unit ID: P205

emissions unit is vented inside the building..

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)

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**Sauder Woodworking Company**

**PTI Application: 02 12200**

**Issued**

**Facility ID: 0326000160**

Washington, D.C. 21460

Emissions Unit ID: P205

Saude

PTI A

Emissions Unit ID: P205

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P205 - Pneumatic (24,128 acfm) wood waste handling system (center central silo area H)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P206 - Pneumatic (20,280 acfm) wood waste handling system (east central silo area H)	OAC rule 3745-31-05(A)(3)	0.73 lb PE/hr
		0.040 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21	0.0042 gr PE/dscf, 3.20 TPY PE
	OAC rule 3745-31-10 through 3745-31-20	(see A.I.2.e.)
		0.00023 gr PM <sub>10</sub> /dscf, 0.18 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

Emissions Unit ID: P206

**Sauder Woodworking Company**  
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**Issued: To be entered upon final issuance**

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3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.)
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio

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EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b.

Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Unit ID: P206

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

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

- b. Emissions Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.040 lb PM<sub>10</sub>/hr, 0.18 TPY PM<sub>10</sub>

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (20,280 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity

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as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
 Environmental Appeals Board

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401 M Street, SW (MC-113do)

Washington, D.C. 21460

Emissions Unit ID: P206

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**Issued: To be entered upon final issuance**  
**B. State Only Enforceable Section**

**Facility ID: 0326000160**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P206 - Pneumatic (20,280 acfm) wood waste handling system (east central silo area H)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

Saude  
PTI A

Emissions Unit ID: P317

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P317 - Pneumatic (72,000 acfm) wood waste handling system (Sauder Street area F)	OAC rule 3745-31-05(A)(3)	2.59 lb PE/hr
		0.14 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr PE/dscf, 11.34 TPY PE (see A.I.2.e.)
		0.00023 gr PM <sub>10</sub> /dscf, 0.61 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

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Emissions Unit ID: P317

**Issued: To be entered upon final issuance**

3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.

2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.)
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent

to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Unit ID: P317

- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

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

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Emissions Unit ID: P317

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

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PTI A

Emissions Unit ID: P317

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P317 - Pneumatic (72,000 acfm) wood waste handling system (Sauder Street area F)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**PTI Application: 02 12200**

**Issued**

**Facility ID: 0326000160**

Emissions Unit ID: P317

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P408 - Pneumatic (72,000 acfm) wood waste handling system (Brush Creek area N)	OAC rule 3745-31-05(A)(3)	2.59 lb PE/hr  0.14 lb PM <sub>10</sub> /hr  Opacity restrictions (see A.I.2.a.)  See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr/dscf, 11.34 TPY PE (see A.I.2.e.)
		0.00023 gr /dscf, 0.61 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, exceed when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

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3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.

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2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

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

- a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
- b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.)

- c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District

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Office.

- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
  - e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

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- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR

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Part 60, Appendix A.

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

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Emissions Unit ID: P408

**Sauder Woodworking Company**

**PTI Application: 03-13380**

**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**  
**B. State Only Enforceable Section**

**Facility ID: 0326000160**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P408 - Pneumatic (72,000 acfm) wood waste handling system (Brush Creek area N)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Saude

PTI A

Emissions Unit ID: P513

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P513 - Hymmen laminator #1 (roller type adhesive applicator with 2,976 acfm ventilation system)	OAC rule 3745-31-05	0.014 lb OC/hr, 0.06 TPY OC
	OAC rule 3745-21-07(G)	None (see A.II.1.)

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information for each month for this emissions unit:

- a. the company identification for each resin employed;
- b. the number of gallons of each resin employed;
- c. the OC content of each resin, in lbs/gallon;
- d. the total OC emissions rate for all resin, in lbs/month; and
- e. the annual, year to date, emissions for the calendar year.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed. The report shall be submitted within 45 days after the deviation occurs.
2. The permittee shall submit annual written reports of any deviations from the annual emission limitation in section A.I. The reports shall be submitted by annually by January 31 of each year and shall cover the previous calendar year. These reports shall include the actual organic compound emissions for the year and shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

#### V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 0.014 lbs OC/hr

Applicable Compliance Method: The hourly OC limit is based on the emission's unit potential to emit\*. Therefore, no daily recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.

\*The potential emit for this emissions unit was determined by assuming 1 ppm of formaldehyde is released, multiplying by the flow rate (2976 acfm) and then multiplying by 60 mins/hr.

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Emissions Unit ID: P513

b. Emission Limitation: 0.06 TPY OC

Applicable Compliance Method: Compliance with the TPY emission limitation shall be based upon the recordkeeping requirements specified in section A.III.2 of this permit.

**VI. Miscellaneous Requirements**

None

Saude

PTI A

Emissions Unit ID: P513

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P513 - Hymmen laminator #1 (roller type adhesive applicator with 2,976 acfm ventilation system)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

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because the emission unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require a permittee to apply for and obtain a new permit to install.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P514 - Pneumatic (72,000 acfm) wood waste handling system (Meyers Road South)	OAC rule 3745-31-05(A)(3)	2.59 lbs PE/hr 0.14 lb PM <sub>10</sub> /hr Opacity restrictions (see A.I.2.a.) See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr PE/dscf, 11.34 TPY PE (see A.I.2.e.) 0.00023 gr PM <sub>10</sub> /dscf, 0.61 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

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- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through 3745-31-20.
- 2.c This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## II. Operational Restrictions

- 1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the pneumatic wood waste handling system while the unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

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#### **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60,

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Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may

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request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

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

- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

Applicable Compliance Method:

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method:

Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's

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maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

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

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit,

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unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and

- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**  
**B. State Only Enforceable Section**

**Facility ID: 0326000160**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P514 - Pneumatic (27,000 acfm) wood waste handling system (Meyers Road South)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Saude

PTI A

Emissions Unit ID: P515

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P515 - Pneumatic (72,000 acfm) wood waste handling system (Meyers Road South)	OAC rule 3745-31-05(A)(3)	2.59 lbs PE/hr, 0.14 lb PM <sub>10</sub> /hr Opacity restrictions (see A.I.2.a.) See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr PE/dscf, 11.34 TPY PE (see A.I.2.e.)
		0.00023 gr PM <sub>10</sub> /dscf, 0.61 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

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3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

**Saude****PTI A**

Emissions Unit ID: P515

**Issued: To be entered upon final issuance**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent

to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Unit ID: P515

- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

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

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Emissions Unit ID: P515

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P515 - Pneumatic (72,000 acfm) wood waste handling system (Meyers Road South)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13380

Issued: To be entered upon final issuance

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P516 - Pneumatic (72,000 acfm) wood waste handling system (Meyers Road South)	OAC rule 3745-31-05(A)(3)	2.59 lbs PE/hr
		0.14 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21	0.0042 gr PE/dscf, 11.34 TPY PE
	OAC rule 3745-31-10 through 3745-31-20	(see A.I.2.e.)
		0.00023 gr PM <sub>10</sub> /dscf, 0.61 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b** The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

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3745-31-20.

- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.

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2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

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

- a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
- b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).

- c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio

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EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b.

Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Unit ID: P516

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- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emission Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity

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as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board

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401 M Street, SW (MC-113do)

Washington, D.C. 21460

**Facility ID: 0326000160**

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P516 - Pneumatic (72,000 acfm) wood waste handling system (Meyers Road South)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P517 - Pneumatic (72,000 acfm) wood waste handling system (Barre Road area B)	OAC rule 3745-31-05(A)(3)	2.59 lbs PE/hr 0.14 PM <sub>10</sub> /hr Opacity restrictions (see A.I.2.a.) See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr PE/dscf, 11.34 TPY PE (see A.I.2.e.) 0.00023 gr PM <sub>10</sub> /dscf, 0.61 TPY PM <sub>10</sub>

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through 3745-31-20.
- 2.c This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule

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3745-17-11 is not applicable.

- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration on 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

**Saude****PTI A**

Emissions Unit ID: P517

**Issued: To be entered upon final issuance**

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

- a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
- b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).

- c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent

Emissions Unit ID: P517

to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.34 TPY PE

Applicable Compliance Method:

Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by

Saude

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: P517

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.14 lb PM<sub>10</sub>/hr, 0.61 TPY PM<sub>10</sub>

Applicable Compliance Method:

Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emission Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the

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Emissions Unit ID: P517

emissions unit is vented inside the building.

Applicable Compliance Method: Visible emission observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency  
Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

Saude

PTI A

Emissions Unit ID: P517

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P517 - Pneumatic (72,000 acfm) wood waste handling system (Barre Road area B)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P518 - Pneumatic (50,000 acfm) wood waste handling system (Meyers Road)	OAC rule 3745-31-05(A)(3)	1.80 lbs PE/hr
		0.099 lb PM <sub>10</sub> /hr
		Opacity restrictions (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-17-07(A)	None (see A.I.2.c.)
	OAC rule 3745-17-11	None (see A.I.2.d.)
	40 CFR 52.21 OAC rule 3745-31-10 through 3745-31-20	0.0042 gr PE/dscf, 7.88 TPY PE (see A.I.2.e.)
		0.00023 gr PM <sub>10</sub> /dscf, 0.43 TPY PM <sub>10</sub>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 40 CFR 52.21 and OAC rule 3745-31-10 through

Emissions Unit ID: P518

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- 2.c** This emissions unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.
- 2.e** The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a maximum outlet concentration of 0.0042 grains PE/dscf from the wood waste handling system.

## **II. Operational Restrictions**

1. The pressure drop across the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## **III. Monitoring and/or Recordkeeping Requirements**

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

## **IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

## **V. Testing Requirements**

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1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing required in A.V.1.b. shall be conducted within 180 days after the initial startup of the affected emissions units.
  - b. Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration (see A.V.1.e.).

Emissions testing shall also be conducted to verify the PM<sub>10</sub> emissions factor of 0.0023 gr/dscf used to establish PM<sub>10</sub> emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM<sub>10</sub> (see A.V.1.e.).
  - c. The following test method(s) shall be employed: for PE, Method 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub> Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
  - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio

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EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b.

Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM<sub>10</sub>. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - f. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
2. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

Emissions Unit ID: P518

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

- a. Emission Limitation: 0.0042 gr PE/dscf, 1.80 lb PE/hr, 7.88 TPY PE

Applicable Compliance Method:

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

- b. Emission Limitation: 0.00023 gr PM<sub>10</sub>/dscf, 0.099 lb PM<sub>10</sub>/hr, 0.43 TPY PM<sub>10</sub>

Applicable Compliance Method:

Compliance with the PM<sub>10</sub> outlet concentration of 0.00023 gr/dscf shall be demonstrated by the emissions testing in A.V.1. Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.00023 gr PM<sub>10</sub>/dscf by the maximum volumetric air flow (50,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM<sub>10</sub> emissions rate shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

- c. Emission Limitation: Visible particulate emissions from the pneumatic wood waste

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**

**Facility ID: 0326000160**

handling system shall not exceed 5% opacity as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: Visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## **VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency

**Sauder Woodworking Company**

**PTI Application: 03-13380**

**Issued: To be entered upon final issuance**

Environmental Appeals Board  
401 M Street, SW (MC-113do)  
Washington, D.C. 21460

Emissions Unit ID: P518

**Facility ID: 0326000160**

**Sauder Woodworking Company**  
**PTI Application: 03-13380**  
**Issued: To be entered upon final issuance**  
**B. State Only Enforceable Section**

**Facility ID: 0326000160**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P518 - Pneumatic (50,000 acfm) wood waste handling system (Meyers Road)		

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Saude  
PTI A**

Emissions Unit ID: P801

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P801 - 453 inkers (roller type stain applicators with fugitive emissions to building air)	OAC rule 3745-31-05(A)(3)	6.80 lbs OC/hr, 29.90 TPY OC
	OAC rule 3745-21-07(G)	None (see A.II.)

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain records of the following information for this emissions unit:
  - a. the company identification for each liquid organic material employed in this emissions unit; and
  - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information for each month for this emissions unit:

**Issued: To be entered upon final issuance**

- a. the company identification for each ink employed;
- b. the number of gallons of each ink employed;
- c. the OC content of each ink, in lbs/gallon;
- d. the total OC emission rate for all inks, in lbs/month; and
- e. the annual, year to date, emissions for the calendar year.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed. The report shall be submitted within 45 days after the deviation occurs.
2. The permittee shall submit annual written reports of any deviations from the annual emission limitation in section A.I. The reports shall be submitted by annually by January 31 of each year and shall cover the previous calendar year. These reports shall include the actual organic compound emissions for the year and shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.
3. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.80 lbs OC/hr

Applicable Compliance Method: The hourly OC limit is based on the emission's unit potential to emit\*. Therefore, no daily recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.

\*The potential emit for this emissions unit

**Sauder Woodworking Company**  
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**Issued**

**Facility ID: 0326000160**

Emissions Unit ID: P801  
was determined by taking the total VOC emissions attributed to inkers for 1999 (29,000 pounds) dividing by the number of inkers (286), then dividing by the 1999 hours of operation (6762) and then multiplying by 453 inkers.

- b. Emission Limitation: 29.90 TPY OC

Applicable Compliance Method: Compliance with the TPY emission limitation shall be based upon the recordkeeping requirements specified in section A.III.2. of this permit.

## **VI. Miscellaneous Requirements**

None

Saude

PTI A

Emissions Unit ID: P801

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P801 - 453 inkers (roller type stain applicator with fugitive emissions to building air)		

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary

**Saude****PTI A**

Emissions Unit ID: P801

**Issued: To be entered upon final issuance**

because the emission unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require a permittee to apply for and obtain a new permit to install.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P204

EMISSIONS UNIT DESCRIPTION Pneumatic (20,280 acfm) wood waste handling system - west central silo area H

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.73	3.20	0.73	3.20
PM <sub>10</sub>	Attainment	0.040	0.18	0.040	0.18
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? X OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511

SCC CODE 3-07-020-99

EMISSIONS UNIT ID P205

EMISSIONS UNIT DESCRIPTION Pneumatic (24,128 acfm) wood waste handling system - center central silo area H

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.87	3.81	0.87	3.81
PM <sub>10</sub>	Attainment	0.048	0.21	0.048	0.21
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD? X

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511

SCC CODE 3-07-020-99

EMISSIONS UNIT ID P206

EMISSIONS UNIT DESCRIPTION Pneumatic (20,280 acfm) wood waste handling system - east central silo area H

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.73	3.20	0.73	3.20
PM <sub>10</sub>	Attainment	0.040	0.18	0.040	0.18
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD? X

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P317  
 EMISSIONS UNIT DESCRIPTION Pneumatic (72,000 acfm) wood waste handling system - Sauder Street area F  
 DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? X \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511

SCC CODE 3-07-020-99

EMISSIONS UNIT ID P408

EMISSIONS UNIT DESCRIPTION Pneumatic (72,000 acfm) wood waste handling system - Brush Creek area N

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS?

NESHAP?

PSD? X

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*?

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P513

EMISSIONS UNIT DESCRIPTION Hymmen laminator #1 (roller type adhesive applicator with 2,976 acfm ventilation system)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	0.014	0.06	0.014	0.06
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of non-photochemically reactive materials and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P514

EMISSIONS UNIT DESCRIPTION Pneumatic (72,000 acfm) wood waste handling system - Meyers Road South

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? X OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P515

EMISSIONS UNIT DESCRIPTION Pneumatic (72,000 acfm) wood waste handling system - Meyers Road South

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? X OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511

SCC CODE 3-07-020-99

EMISSIONS UNIT ID P516

EMISSIONS UNIT DESCRIPTION Pneumatic (72,000 acfm) wood waste handling system - Meyers Road South

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD? **X**

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P517

EMISSIONS UNIT DESCRIPTION Pneumatic (72,00 acfm) wood waste handling system - Barre Road area B

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	2.59	11.34	2.59	11.34
PM <sub>10</sub>	Attainment	0.14	0.61	0.14	0.61
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? X OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380 Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511 SCC CODE 3-07-020-99 EMISSIONS UNIT ID P518

EMISSIONS UNIT DESCRIPTION Pneumatic (50,000 acfm) wood waste handling system - Meyers Road

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	1.80	7.88	1.80	7.88
PM <sub>10</sub>	Attainment	0.099	0.43	0.099	0.43
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? X OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

SIC CODE 2511

SCC CODE 3-07-020-99

EMISSIONS UNIT ID P801

EMISSIONS UNIT DESCRIPTION 453 inkers (roller type stain applicator with fugitive emissions to building air)

DATE INSTALLED Upon issuance of PTI

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	6.80	29.90	6.80	29.90
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of non-photochemically reactive materials and compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13380

Facility ID: 0326000160

FACILITY NAME Sauder Woodworking Company

FACILITY DESCRIPTION Wood household furniture

CITY/TWP Archbold

Emissions Unit ID: P801

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

See Permit Review Forms (calculations)

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	86.13
PM <sub>10</sub>	4.66
OC	29.96