



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
FULTON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13201

DATE: 6/27/2002

Sauder Woodworking Company
John Schlatter
502 Middle Street
Archbold, OH 43502

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/27/2002
Effective Date: 6/27/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13201

Application Number: 03-13201
APS Premise Number: 0326000160
Permit Fee: **\$400**
Name of Facility: Sauder Woodworking Company
Person to Contact: John Schlatter
Address: 502 Middle Street
Archbold, OH 43502

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

Description of proposed emissions unit(s):
Modification to allow for an increase in PM10 emission limitations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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.10 below if no deviations occurred during the quarter.

- 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

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 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.

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.

11. Best Available Technology

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

12. 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.

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. 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.

5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

Sauder Woodworking Company
 PTI Application: **03-13201**
Modification Issued: 6/27/2002

Facility ID: **0326000160**

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).

8. 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.

9. 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**

| <u>Pollutant</u> | <u>Tons/Year</u> |
|------------------|------------------|
| PE | 45.4 |
| PM ₁₀ | 32.4 |
| OC | 1.6 |

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. 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.

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> |
|--|--|--|
| P407 - 72,000 acfm wood waste handling system (Administrative modification of PTI # 03-13201 issued on 8/18/99 to add PE emission limitations) | OAC rule 3745-31-05(A)(3) | 1.85 lb PM ₁₀ /hr, 8.10 TPY PM ₁₀ |
| | | 2.59 lb PE/hr, 11.35 TPY PE |
| | | Opacity restrictions (see A.I.2.a.) |
| | | See A.I.2.e. |
| | OAC rule 3745-17-11(B)(1) | (none see A.I.2..b.) |
| | OAC rule 3745-17-07(A)(1) | (none see A.I.2..c.) |
| | 40 CFR 52.21 OAC rule 3745-31-(10-20) | 0.0042 gr PE/dscf, 0.0030 grain M ₁₀ /dscf, (see A.I.2.d) |

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 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)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.c Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not

Modification Issued: 6/27/2002

apply.

- 2.d** 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 and 0.0030 grains PM₁₀/dscf from the wood waste handling system.
- 2.e** 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.

II. Operational Restrictions

- 1. The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 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.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it 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 that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

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

Emissions Unit ID: P407

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 PM₁₀ emissions factor of 0.0030 gr/dscf used to establish PM₁₀ 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 PM₁₀ (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 PM₁₀ Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM₁₀. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
 - 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 emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

Modification Issued: 6/27/2002

- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.35 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: 0.0030 gr PM₁₀/dscf, 1.85 lb PM₁₀/hr, 8.10 TPY PM₁₀

Applicable Compliance Method: Compliance with the PM₁₀ outlet concentration of 0.0030 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 0.0030 gr PM₁₀/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM₁₀ emissions rate shall be based on stack testing using the methods and procedures specified in 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: If required, 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 any 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

Sauder Woodworking Company

PTI Application: **02 12201**

Modif

Facility ID: **0326000160**

Emissions Unit ID: **P407**

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 OEPA.

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 s 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, DC 21460

Modification Issued: 6/27/2002

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> |
|---|--------------------------------------|--|
| 72,000 acfm wood waste handling system | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Modification Issued: 6/27/2002

Emissions Unit ID: **P407**

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> |
|--|--|---|
| P509 - 72,000 acfm wood waste handling system (Administrative modification of PTI # 03-13201 issued on 8/18/99 to add PE emission limitations) | OAC rule 3745-31-05(A)(3) | 1.85 lb PM ₁₀ /hr, 8.10 TPY PM ₁₀ |
| | | 2.59 lb PE/hr, 11.35 TPY PE |
| | | Opacity restrictions (see A.I.2.a.) |
| | | See A.I.2.e. |
| | OAC rule 3745-17-11(B)(1) | (none see A.I.2..b.) |
| | OAC rule 3745-17-07(A)(1) | (none see A.I.2..c.) |
| | 40 CFR 52.21 OAC rule 3745-31-(10-20) | 0.0042 gr PE/dscf, 0.0030 grain PM ₁₀ /dscf (see A.I.2.d) |

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 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)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.c Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

Emissions Unit ID: P509

- 2.d** 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 and 0.0030 grains PM₁₀/dscf from the wood waste handling system.
- 2.e** 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.

II. Operational Restrictions

1. The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it 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 that all periods of time during which the pressure drop across the wood handling system did not comply with the allowable range specified above.

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 PM₁₀ emissions factor of 0.0030 gr/dscf used to establish PM₁₀ emissions limitations for the emissions units contained in

Modification Issued: 6/27/2002

- 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 PM₁₀ (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 PM₁₀ Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM₁₀. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
 - 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 emission limitations established for emissions unit P509 shall be determined in accordance with the following methods:
 - a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.35 TPY PE

Emissions Unit ID: P509

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: 0.0030 gr PM₁₀/dscf, 1.85 lb PM₁₀/hr, 8.10 TPY PM₁₀

Applicable Compliance Method: Compliance with the PM₁₀ outlet concentration of 0.0030 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 0.0030 gr PM₁₀/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM₁₀ emissions rate shall be based on stack testing using the methods and procedures specified in 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: If required, 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 any 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 PTI is subject to the applicable provisions of the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

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

Modification Issued: 6/27/2002

- 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 s 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, DC 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> |
|---|--------------------------------------|--|
| 72,000 acfm wood waste handling system | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - 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> |
|--|--|---|
| P510 - 72,000 acfm wood waste handling system (Administrative modification of PTI # 03-13201 issued on 8/18/99 to add PE emission limitations) | OAC rule 3745-31-05(A)(3) | 1.85 lb PM ₁₀ /hr, 8.10 TPY PM ₁₀ |
| | | 2.59 lb PE/hr, 11.35 TPY PE |
| | | Opacity restrictions (see A.I.2.a.) |
| | | See A.I.2.e. |
| | OAC rule 3745-17-11(B)(1) | (none see A.I.2..b.) |
| | OAC rule 3745-17-07(A)(1) | (none see A.I.2.c.) |
| | 40 CFR 52.21 OAC rule 3745-31-(10-20) | 0.0042 gr PE/dscf, 0.0030 grain PM ₁₀ /dscf (see A.I.2.d) |

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 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)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.c Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

Emissions Unit ID: P510

- 2.d** 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 and 0.0030 grains PM₁₀/dscf from the wood waste handling system.
- 2.e** 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.

II. Operational Restrictions

1. The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 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.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it 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 that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

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 PM₁₀ emissions factor of 0.0030 gr/dscf used to establish PM₁₀ emissions limitations for the emissions units contained in this permit to install. Verification of the emissions factor shall be demonstrated by

Emissions Unit ID: **P510**

performing emissions testing on emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PM₁₀ (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 PM₁₀ Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM₁₀. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
 - 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 emission limitations established for emissions unit P510 shall be determined in accordance with the following methods:
- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.35 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

Emissions Unit ID: P510

methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation: 0.0030 gr PM₁₀/dscf, 1.85 lb PM₁₀/hr, 8.10 TPY PM₁₀

Applicable Compliance Method: Compliance with the PM₁₀ outlet concentration of 0.0030 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 0.0030 gr PM₁₀/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM₁₀ emissions rate shall be based on stack testing using the methods and procedures specified in 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: If required, 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 any 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 is subject to the applicable provisions of the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

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.

Modification Issued: 6/27/2002

Emissions Unit ID: **P510**

Emissions Unit ID: **P510**

Modification Issued: 6/27/2002

Appeals will be addressed to:

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

Modification Issued: 6/27/2002

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> |
|---|--------------------------------------|--|
| 72,000 acfm wood waste handling system | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - 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> |
|--|--|---|
| P511 - 72,000 acfm wood waste handling system (Administrative modification of PTI # 03-13201 issued on 8/18/99 to add PE emission limitations) | OAC rule 3745-31-05(A)(3) | 1.85 lb PM ₁₀ /hr, 8.10 TPY PM ₁₀ 2.59 lb PE/hr, 11.35 TPY PE Opacity restrictions (see A.I.2.a.) See A.I.2.e. |
| | OAC rule 3745-17-11(B)(1) | (none see A.I.2.b.) |
| | OAC rule 3745-17-07(A)(1) | (none see A.I.2.c.) |
| | 40 CFR 52.21 OAC rule 3745-31-(10-20) | 0.0042 gr PE/dscf, 0.0030 grain PM ₁₀ /dscf (see A.I.2.d) |

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 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)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.c Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

Modification Issued: 6/27/2002

- 2.d** 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 and 0.0030 grains PM₁₀/dscf from the wood waste handling system.
- 2.e** 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.

II. Operational Restrictions

- 1. The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 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.

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it 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 that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

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)

Emissions Unit ID: P511

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 PM₁₀ emissions factor of 0.0030 gr/dscf used to establish PM₁₀ 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 PM₁₀ (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 PM₁₀ Method 201 or 201A or Method 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
 - d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM₁₀. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
 - 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 emission limitations established for emissions unit P511 shall be determined in accordance with the following methods:
- a. Emission Limitation: 0.0042 gr PE/dscf, 2.59 lb PE/hr, 11.35 TPY PE

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042

Modification Issued: 6/27/2002

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: 0.0030 gr PM₁₀/dscf, 1.85 lb PM₁₀/hr, 8.10 TPY PM₁₀

Applicable Compliance Method: Compliance with the PM₁₀ outlet concentration of 0.0030 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 0.0030 gr PM₁₀/dscf by the maximum volumetric air flow (72,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM₁₀ emissions rate shall be based on stack testing using the methods and procedures specified in 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: If required, 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 any 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 is subject to the applicable provisions of

Emissions Unit ID: P511

the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

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 s suspended until such time as the appeal is resolved or denied.

Emissions Unit ID: **P511**

Modification Issued: 6/27/2002

Appeals will be addressed to:

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

Modification Issued: 6/27/2002

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> |
|---|--------------------------------------|--|
| 72,000 acfm wood waste handling system | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Modification Issued: 6/27/2002

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> |
|--|--------------------------------------|--|
| P512 - hymmen laminator #2 (Administrative modification of PTI # 03-13201 issued on 8/18/99 to move 3745-31-05 to State and Federal side) | OAC rule 3745-31-05(A)(3) | 0.36 lbs Organic Compounds (OC)/hr & 1.6 TPY |
| | 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 Record Keeping Requirements

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

photochemically reactive material.

2. The permittee shall collect and record the following information for each month for this emissions unit:

Modification Issued: 6/27/2002

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

*It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process and is not emitted to the atmosphere. Therefore, the emission rate is the # of gallons times OC content times a unitless emission factor of 0.1.

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.

The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation-
0.36 lb OC/hr

Applicable Compliance Method-

The hourly OC limits are based on each emissions unit's potential to emit i.e., the maximum usage rates of 59.5 gallons of coating per hour at the maximum OC content of 0.06 lbs/gallon, and an emission factor of 0.1. [See condition B(III) above.] Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-
1.6 TPY of OC

Emissions Unit ID: **P512**

Modification Issued: 6/27/2002

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in B(III) above.

Modification Issued: 6/27/2002

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resins.

None

VI. Miscellaneous Requirements

None

Modification Issued: 6/27/2002

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> |
|---|--------------------------------------|--|
| hymmen laminator #2 | None | None |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None