

**STAFF DRAFT ACTION DETERMINATION  
FOR THE APPLICATION OF SAUDER WOODWORKING COMPANY  
PREVENTION OF SIGNIFICANT DETERIORATION (PSD)  
AIR PERMIT TO INSTALL NO. 03-016064  
FOR SEVEN PNEUMATIC WOOD WASTE HANDLING SYSTEMS AND ONE FIBERBOARD  
LAMINATOR  
TO BE LOCATED IN FULTON COUNTY, OHIO**

**April 20, 2004**

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

Facility Description

The Sauder Woodworking Company (Sauder) is an existing wood furniture facility located at 502 Middle Street, Archbold, Fulton County, Ohio 43502. Sauder is proposing to install 7 pneumatic wood waste handling systems (one at 50,000 acfm, and six at 72,000) and a fiberboard laminator. These emissions units were previously permitted under PTI #03-13380 issued June 27, 2002; however Sauder had not installed or undertaken a continuing program of installation as required in OAC 3745-31-06, before the permit term expired and was terminated. Sauder is reapplying for another PTI to replace the expired permit, PTI #03-13380.

Sauder processes raw fiberboard and particle board through various laminating processes. The laminated fiber boards are then cut, shaped, sanded, counter banded, edged, and inked as needed. The woodworking operations generate large amounts of wood dust which is collected and controlled by the pneumatic wood waste handling systems. The saw dust generated from these operations is transferred to silos at the Co-Generation facility for combustion or load-out. Sauder produces other wood furniture, as well as, corrugated boxes, foaming packing material, and other packaging or shipping containers for their products. Particulate matter emitted from the packaging area is collected and routed to an internally venting baghouse.

New Source Review (NSR)/PSD Applicability

Fulton County is an attainment area for all criteria pollutants. Sauder is classified as a "major" stationary source for PSD because its potential to emit PM<sup>10</sup>, NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOCs exceeds 250 tons per year. Emissions resulting from the installation of the 7 pneumatic wood waste handling systems will exceed the PSD significant emission rate for PM<sub>10</sub>. Table 1 shows the potential emissions from the proposed project.

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	81.17*	N/A	-
PM <sub>10</sub>	58.02*	15	yes
SO <sub>2</sub>	0.0	40	no
NO <sub>x</sub>	0.0	40	no
CO	0.0	100	no
VOC	2.34*	40	no

Pb (lead)	0.0	0.6	no
HAP	1.58	N/A	-
HAPs	1.58	N/A	-

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

\* 5.25 tons of PE and 3.76 tons of PM<sub>10</sub> are contributed from net increases at existing silos; and an additional 0.76 tons of VOC from the packaging foam molder

### MACT Applicability

Sauder is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) under 40 CFR Part 63, Subpart JJ for Wood Furniture Manufacturing Operations. The proposed wood waste handling systems emit only PM and the laminator emits only small amounts of formaldehyde, well below the levels subject to the limits in this NESHAP. However, the facility is subject and must comply with the applicable work practice requirements from this NESHAP.

### 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 PM<sub>10</sub>. The application did not include a complete "top-down" approach to determine an appropriate level of control because Sauder has agreed to use baghouses with 99% control efficiency, with effluent grain loading limits of 0.0042 grain PM per dry standard cubic foot and 0.003 grain PM<sub>10</sub> per dry standard cubic foot.

While the application did not discuss a "top-down" approach, the BACT analysis does describe the types of control equipment which could be used to control particulate matter, with mention of cyclones, electrostatic precipitators, venturi scrubbers, packed tower scrubbers, and baghouses. With a commitment to a 99% control efficiency of PM, and low grain loading of the filters, the baghouse demonstrated the highest level of control for PM. In the September 1999 review of Sauder's PSD permit application for a similar laminator and woodwaste-handling system project, BACT was also determined to be a high efficiency baghouse system. Since there have been no significant advances in control technology since that time, the emission rates and baghouse control, submitted in the current application are considered to be BACT.

### 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 particulate matter control efficiency of 99% and effluent grain loading limits of 0.0042 grain PM 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 grain PM 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.

Site Description/Air Quality Designations

Sauder is located in Fulton County which is in Air Quality Control Region (AQCR) 177. 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

Fulton County 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 is not required to conduct pre-application monitoring. Table 2, below summaries the predicted impact concentrations from the initial application 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
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### Modeling

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 PSD significant impact levels. This triggers the requirement for air quality modeling to assess the potential impact of the proposed project on PM<sub>10</sub> PSD increments and NAAQS.

The facility was evaluated using the ISCST3 model (version 02035). 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.

Based on the initial modeling submittal, 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 was 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 indicate a peak annual concentrations of 6.9 ug/m<sup>3</sup> and a high-sixth-high PM<sub>10</sub> concentration over the five year period of 26.9 ug/m<sup>3</sup>.

The PSD impacts reflect multiple projects and are below the full federal PSD Class II increments for PM<sub>10</sub>. PM<sub>10</sub> impacts for the current project are above the Ohio EPA ½ increment policy. The areas exceeding ½ of the PSD increment are occurring on or near plant property, within the complex of Sauder operations. 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.

### NAAQS Analysis

A NAAQS analyses was performed to determine the impact of the entire Sauder facility combined with all potentially interacting offsite 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, indicate a high-sixth-high 24-hour PM<sub>10</sub> concentration over five years 5-years of 142.5 ug/m<sup>3</sup>. The peak annual concentration was 42.1 ug/m<sup>3</sup>. The background values used for 24-hour and annual NAAQS concentrations were 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 growth margin available.

### 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 project.

### Conclusions

Based upon the analysis of the permit to install application and it's 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  
FULTON COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 03-16064**

**DATE: 4/20/2004**

Sauder Woodworking Company  
John Schlatter  
502 Middle Street  
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 **\$1600** 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,

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

CC: USEPA

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**FULTON COUNTY  
PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL  
SUBJECT TO PREVENTION OF SIGNIFICANT DETERIORATION REVIEW  
FOR SAUDER WOODWORKING COMPANY - ARCHBOLD FACILITY**

Public notice is hereby given that the Ohio Environmental Protection Agency (EPA) Division of Air Pollution Control has issued, on April 20, 2004, a preliminary staff determination of air Permit to Install (PTI) application No. 03-01345 to Sauder Woodworking Company (Sauder). Sauder is proposing to install 7 pneumatic wood waste handling systems (one at 50,000 acfm, and six at 72,000) and a fiberboard laminator. These changes will result in Prevention of Significant Deterioration(PSD) review requirements triggered by significant emissions increases for PM10.

The Sauder Woodworking Company (Sauder) is an existing wood furniture facility located at 502 Middle Street, Archbold, Fulton County, Ohio 43502

Comparing the net emission increases associated with the proposed project against the PSD significant net emission increase criteria, only PM10 exceeds the significant levels, with an increase of 58.02 tons of PM10, having a PSD threshold of 15 tons/year. The facility is therefore subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by U.S. EPA (40 CFR 52.21), and regulated under the Ohio EPA PSD rules and permit to install requirements found in Chapter 31of the Ohio Administrative Code.

The U.S. EPA allows new sources to consume no more than the PSD increment(s) for each PSD pollutant. The Ohio EPA allows new PSD projects to consume no more than one half the available increment, with some exceptions. If more than 50% of the available increment is consumed, it should be demonstrated that the only potential constraint on future growth in the region would be on the applicant. The cumulative PM10 impacts of a series of projects at this facility are now consuming the majority of the PSD PM10 increment near the facility property line. In addition, the combined impacts of new and existing sources are approaching the national ambient air quality standards for PM10 in the vicinity of the Sauder complex of operations. While these impacts are still at acceptable levels, Ohio EPA believes that additional growth in the vicinity of this plant, especially to the plant itself, is limited.

Within 30 days from the date of this notice, any interested party may submit comments or request a public hearing. Comments are to be sent to Jan Tredway of the Northwest District Office, 347 North Dunbridge Road, Bowling Green, Ohio 43402.



**Permit To Install  
Terms and  
Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 03-16064**

Application Number: 03-16064  
APS Premise Number: 0326000160  
Permit Fee: **To be entered upon final issuance**  
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):  
**(6) Woodwaste handling systems, and (1) hymmen laminator.**

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: 03-16064

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.9 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.

**Sauder Woodworking Company**

**Facility ID: 0326000160**

**PTI Application: 03-16064**

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

**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

**Sauder Woodworking Company**

**Facility ID: 0326000160**

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

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 ninety (90) 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.

Sauder Woodworking Company

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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**

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

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

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**

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

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required for any emissions unit for which a Permit To Install is required.

**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 Per Year</u>
PE	75.92
PM <sub>10</sub>	54.26
OC	1.58

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## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63, Subpart JJ, the National Emission Standards for Wood Furniture Manufacturing Operations; as well as, the applicable requirements of the General Provisions of the NESHAPs under Subpart A of part 63, as identified in Table 1 of subpart JJ.
2. Work Practice Standards:

- a. Work Practice Implementation Plan:

The permittee shall prepare and maintain a written work practice implementation plan that defines the work practices, for each wood furniture manufacturing operation, that will best minimize emissions of hazardous air pollutants. The plan shall address each of the work practice standards presented in Sections A.2.b through A.2.l, which are based on paragraphs (b) through (l) of 40 CFR 63.803. The written work practice implementation plan shall be developed in accordance with 40 CFR Part 63, Subpart JJ, and shall be available for inspection by the Director or the Ohio EPA Northwest District Office upon request. If the Director or the Ohio EPA Northwest District Office determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of Section A.2, or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director or the Ohio EPA Northwest District Office may require this facility to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

- b. Operator Training Course:

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

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

- i. a list of all current personnel by name and job description who are required to be trained;
- ii. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- iii. lesson plans for courses to be given at the initial and the annual refresher training

that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

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

c. Inspection and Maintenance Plan:

The permittee shall prepare and maintain, with the work practice implementation plan, a written leak inspection and maintenance plan that specifies the following:

- i. a requirement for visual inspection frequency, at a minimum of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- ii. an inspection schedule;
- iii. methods for documenting the date and results of each inspection and any repairs that were made;
- iv. the time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
  - (a) a first attempt at repair (e.g., tightening of packing glands) shall be made no later than (5) five calendar days after the leak is detected; and
  - (b) final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within (3) three months.

d. Cleaning and Washoff Solvent Accounting System:

The permittee shall develop an organic HAP solvent accounting log to record the following:

- i. the quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 63.801 of subpart JJ;
- ii. the number of pieces washed off, and the reason for the washoff; and
- iii. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

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- e. **Chemical Composition of Cleaning and Washoff Solvents:**  
The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63, subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
  
- f. **Spray Booth Cleaning:**  
The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished (that is the spray booth coating or other protective material used to cover the booth is being replaced), the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
  
- g. **Storage Requirements:**  
The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
  
- h. **Application Equipment Requirements:**  
The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
  - i. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  - ii. for touchup and repair under the following conditions:
    - (a) the touchup and repair occurs after completion of the finishing operations;  
or
    - (b) the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
  - iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
  - iv. when emissions from the finishing application station are directed to a control device;

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- v. when the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- vi. when the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Ohio EPA Northwest District Office a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
  - (a) the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
  - (b) the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- i. Line Cleaning:  
The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. Gun Cleaning:  
The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. Washoff Operations:  
The permittee shall control emissions from washoff operations by:
  - i. using normally closed tanks for washoff; and
  - ii. minimizing dripping by tilting or rotating the part to drain as much solvent as possible.
- l. Formulation Assessment Plan for Finishing Operations:  
The permittee shall prepare and maintain, with the work practice implementation plan, a formulation assessment plan that:

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- i. identifies VHAP from the list presented in Table 5 of 40 CFR Part 63, subpart JJ that are being used in finishing operations at this facility;
- ii. establishes a baseline level of usage by the affected source for each VHAP identified in Section A.2.1.i. The baseline level shall be established as follows:
  - (a) The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in Section A.2.1.i.
  - (b) For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied.
  - (c) For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16.
  - (d) Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which shall be determined by using the equation in 63.805(d) or (e).
- iii. tracks the annual usage of each VHAP identified in Section A.2.1.i by the permittee that is present in amounts subject to MSDS reporting as required by OSHA.
- iv. If, in accordance with 40 CFR Part 63, the annual usage of the VHAP identified in Section A.2.1.i exceeds its baseline level, then the permittee shall provide written notification to the Ohio EPA Northwest District Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the affected facility operation is not in compliance with any State regulations or requirements for that VHAP:
  - (a) the exceedance is no more than 15.0 percent above the baseline;
  - (b) usage of the VHAP is below the de minimis level presented in Table 5 of subpart JJ for that VHAP;
  - (c) this facility is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
  - (d) the source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

- v. If none of the explanations in Section A.2.1.iv are the reason for the increase, the permittee shall confer with the Ohio EPA District Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations or other criteria mutually agreed upon by the Ohio EPA Northwest District Office and permittee. If there are no practical and reasonable solutions, the permittee needs to take no further action. If there are solutions, the permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- vi. If, in accordance with 40 CFR Part 63, Subpart JJ, an affected source uses a VHAP of potential concern, from Table 6 of Subpart JJ, for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant.

If usage of the VHAP of potential concern exceeds the de minimis level, then the permittee shall provide an explanation to the Ohio EPA Northwest District Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph A.2.1.iv., then the permittee shall follow the procedures established in Section A.2.1.v.

3. Recordkeeping Requirements:

- a. The permittee shall fulfill all record keeping requirements of 40 CFR 63.10 of subpart A, according to the applicability criteria in Section A.1.
- b. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
  - i. records demonstrating that the operator training program required by Section A.2.b is in place;
  - ii. records collected in accordance with the inspection and maintenance plan required by Section A.2.c;
  - iii. records associated with the cleaning solvent accounting system required by Section A.2.d;
  - iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by

Section A.2.h.v;

- v. records associated with the formulation assessment plan required by Section A.2.i; and
  - vi. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- c. The permittee shall maintain records of all other information submitted with the written notifications required by Section A.4.b and the semiannual reports required by Section A.4.c.
- d. As specified under 40 CFR 63.10(b)(1), the permittee shall maintain files of all information (including all reports and notifications) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
4. Reporting Requirements:
- a. The permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in Section A.1.
  - b. For any written notification required under Section A.2.i.iv, the permittee shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
  - c. The permittee shall submit semiannually a compliance certification on the work practice implementation plan. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. The semiannual compliance certifications shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

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

None.

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Emissions Unit ID: P320

**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>
72,000 acfm woodwaste handling system.	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;  1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

**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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 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 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

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

## IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M.. 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

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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 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

## VI. Miscellaneous Requirements

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1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

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Emissions Unit ID: P320

**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>
P320 - 72,000 acfm woodwaste handling system.		None.

**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>
72,000 acfm Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;  1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

**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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 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 3745-17-11 is not applicable.

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- 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

**II. Operational Restrictions**

None

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

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

**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M. 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

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permit shall be determined in accordance with the following methods:

- a. Emissions Limitation: 0.0042 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

**Sauder Woodworking Company****PTI Application: 03-16064****Issued****Facility ID: 0326000160**

Emissions Unit ID: P409

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

Saude

PTI A

Emissions Unit ID: P409

**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>
72,000 acfm Wood Waste Handling System		None.

**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: P410

**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>
72,000 Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;  1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

**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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 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 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

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

## IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M. 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

Emissions Unit ID: P410

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 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

## VI. Miscellaneous Requirements

**Sauder Woodworking Company****PTI Application: 03-16064****Issued****Facility ID: 0326000160**

Emissions Unit ID: P410

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

Saude  
PTI A

Emissions Unit ID: P410

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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>
72,000 Wood Waste Handling System		None.

**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>
Laminator	OAC rule 3745-31-05(A)(3)	0.39 lb organic compounds (OC)/hr and 1.71 tons OC/yr
	40 CFR Part 63, subpart JJ	See Section A.I.2.a.
	OAC rule 3745-21-07(G)	None, see Section A.II.1.

**2. Additional Terms and Conditions**

- 2.a The facility is an affected source as defined in 40 CFR Part 63, Subpart JJ, and as such is subject to the requirements in Part II. Sections A.1 through A.4 of this permit. However, this emissions unit does not employ a coating, sealer, or contact adhesive as defined in 40 CFR Part 63.801; therefore, this emissions unit is not subject to the VHAP content limits established under 40 CFR Part 63, subpart JJ.

**II. Operational Restrictions**

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification for each material employed;

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- b. the OC content of each material employed;
- c. documentation on whether or not each material employed is a photochemically reactive material;
- d. the number of gallons of each material employed;
- e. the OC emission rate for each material employed, (b x d), in pounds or tons;
- f. the total OC emission rate for all materials employed, (summation of e), in tons; and,
- g. the annual, year-to-date OC emission rate for all materials employed, (summation of each calendar month to date, from January to the end of each month of record), in tons.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

**V. Testing Requirements**

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

- a. Emission Limitation: 0.39 lb organic compounds (OC)/hr and 1.71 tons OC/yr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. Compliance with the annual emission limitation shall be determined by the record keeping specified in Section A.III.1.

\*Potential to emit for this emissions unit was established by multiplying a maximum hourly material usage, of 59.5 gal/hr, by the maximum OC content of the resin, 0.6% formaldehyde, times 10.83 lbs/gal, and by an emission factor of 10% for the unreacted formaldehyde emitted.

**VI. Miscellaneous Requirements**

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**Sauder Woodworking Company**

**PTI Application: 03 16064**

**Issued**

**Facility ID: 0326000160**

Emissions Unit ID: P519

None.

**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>
Laminator		None

**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>
72,000 acfm Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;  1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

**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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule

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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 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

**II. Operational Restrictions**

None

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

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

**IV. Reporting Requirements**

Emissions Unit ID: P520

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M. 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

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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 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

**Sauder Woodworking Company****PTI Application: 03-16064****Issued****Facility ID: 0326000160**

Emissions Unit ID: P520

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

**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>
72,000 acfm Wood Waste Handling System		None.

**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>
72,000 acfm Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;  1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

#### 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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 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 3745-17-11 is not applicable.

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

- 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

**II. Operational Restrictions**

None

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

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

**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M. 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

Emissions Unit ID: P521

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 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

## VI. Miscellaneous Requirements

**Sauder Woodworking Company****PTI Application: 03-16064****Issued****Facility ID: 0326000160**

Emissions Unit ID: P521

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

Saude

PTI A

Emissions Unit ID: P521

**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>
72,000 acfm Wood Waste Handling System		None.

**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: P522

**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>
50,000 acfm Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	1.80 lbs particulate emissions (PE)/hr and 7.88 tons PE/yr, including the PM <sub>10</sub> ;  1.29 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 5.65 tons PM <sub>10</sub> /yr;  Opacity restrictions: see Section A.I.2.a; and  See Section A.I.2.b.
	OAC rule 3745-17-07 (A)	None, see Section A.I.2.c.
	OAC rule 3745-17-11	None, see Section A.I.2.d.
	OAC rule 3745-31-10 through 3745-31-20	0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

**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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule

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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 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

**II. Operational Restrictions**

None

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

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

**IV. Reporting Requirements**

Emissions Unit ID: P522

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain  $PM_{10}/dscf$  and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and  $PM_{10}$  (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for  $PM_{10}$ , Method 201 or 201A of 40 CFR Part 51, Appendix M. 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  $PM_{10}$ . 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

Emissions Unit ID: P522

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 grain PE/dscf, 1.80 lb PE/hr, 7.88 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 50,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.29 lb PM<sub>10</sub>/hr, 5.65 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 50,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

## VI. Miscellaneous Requirements

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

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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.

**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>
50,000 acfm Wood Waste Handling System		None.

**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>
72,000 Wood Waste Handling System	OAC rule 3745-31-05 (A) (3)	2.59 lbs particulate emissions (PE)/hr and 11.34 tons PE/yr, including the PM <sub>10</sub> ;
		1.85 lbs/hr particulate matter less than 10 microns in size (PM <sub>10</sub> ) and 8.10 tons PM <sub>10</sub> /yr;
		Opacity restrictions: see Section A.I.2.a; and
	OAC rule 3745-17-07 (A)	See Section A.I.2.b.
	OAC rule 3745-17-11	None, see Section A.I.2.c.
	OAC rule 3745-31-10 through 3745-31-20	None, see Section A.I.2.d.
		0.0042 grain PE/dscf and 0.0030 grain PM <sub>10</sub> /dscf, and see Section A.I.2.e

##### 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 from the stack or building egress points when stack emissions are vented inside the building.
- 2.b The requirements of this rule also include compliance with the requirements of 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 3745-17-11 is not applicable.

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

- 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 grain PE/dscf and 0.0030 grain PM<sub>10</sub>/dscf from the wood waste handling system.

**II. Operational Restrictions**

None

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

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

**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (Ohio EPA Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. Emissions testing shall be conducted within 180 days following the start-up of the emissions units in this permit.
  - b. Emissions testing shall be conducted to verify the emission factors of 0.0030 grain PM<sub>10</sub>/dscf and 0.0042 grain PE/dscf used to establish the emissions limitations in this permit to install. Verification of the emissions factors shall be demonstrated by performing emissions testing on the emissions unit(s) which would be representative of wood waste handling system operations with the greatest outlet concentration of PE and PM<sub>10</sub> (see A.V.1.d).
  - c. The following test method(s) shall be employed: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for PM<sub>10</sub>, Method 201 or 201A of 40 CFR Part 51, Appendix M. 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:

- a. Emissions Limitation: 0.0042 grain PE/dscf, 2.59 lb PE/hr, 11.34 tons PE/yr

Applicable Compliance Method: Compliance with the PE outlet concentration of 0.0042 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0042 grain PE/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PE emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PE.

- b. Emissions Limitation: 0.0030 grain PM<sub>10</sub>/dscf, 1.85 lb PM<sub>10</sub>/hr, 8.10 tons PM<sub>10</sub>/yr

Applicable Compliance Method: Compliance with the PM<sub>10</sub> outlet concentration of 0.0030 gr/dscf shall be demonstrated by the emission testing in A.V.1. Compliance is demonstrated with the hourly emission limitation by multiplying the maximum outlet concentration of 0.0030 grain PM<sub>10</sub>/dscf by the maximum volumetric air flow, 72,000 acf/min, and the appropriate conversion factors of 1 lb/7000 grains and 60 minutes/hr. The permittee may be required to retest, as initially required in Section V.1 above, if compliance with the PM<sup>10</sup> emissions limitation is in question or as required in an operating/Title V permit.

The annual emission limitation was derived by multiplying the hourly emission limitation times 8,760 hrs/yr and dividing by 2,000 lbs/ton. Compliance with the hourly limitation shall also document compliance with the annual emission limitation for PM<sup>10</sup>.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6 minute average from the stack or building egress points when stack emissions are vented inside the building.

Applicable Compliance Method: If required, compliance shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9, or other U.S. EPA approved test method, with prior approval from the Ohio EPA.

## VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update and maintain 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

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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.

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PTI A

Emissions Unit ID: P523

**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>
72,000 Wood Waste Handling System		None.

**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.