



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 03-16064**

**DATE: 6/3/2004**

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

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

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

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

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

Sincerely,

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: 6/3/2004  
Effective Date: 6/3/2004**

**FINAL PERMIT TO INSTALL 03-16064**

Application Number: 03-16064  
APS Premise Number: 0326000160  
Permit Fee: **\$1600**  
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

## 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.

## **6. General Requirements**

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

## **7. Fees**

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

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

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## 9. Compliance Requirements

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

#### **10. Permit To Operate Application**

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

## **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**

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

### **4. Termination of Permit To Install**

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

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

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

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

## **6. Public Disclosure**

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

## **7. Applicability**

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

## **8. Construction Compliance Certification**

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

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

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

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

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

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

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

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Sauder Woodworking Company

PTI Application: **03-16064**

**Issued: 6/3/2004**

Facility ID: **0326000160**

**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 and document successful completion.

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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Sauder Woodworking Company  
PTI Application: **03-16064**  
**Issued: 6/3/2004**

Facility ID: **0326000160**

- 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;

- 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:

- 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**

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Sauder Woodworking Company

PTI Application: **03 16064**

**Issued**

Facility ID: **0326000160**

Emissions Unit ID: P320

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>
P320 - 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.

#### 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.

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- 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

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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 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.

**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>
P409 - 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.
- 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.

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- 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 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.

**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>
P409 - 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>
P410 - 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.

## 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.

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- 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 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.

**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>
P410 - 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.

**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>
P519 - 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;
- 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

None.

**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>
P519 - 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.

**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>
P520 - 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.

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- 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.

## 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.

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- 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 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.

**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>
P520 - 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>
P521 - 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.

- 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 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.

**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>
P521 - 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>
P522 - 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 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.

## 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.

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- 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, 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**

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.

**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>
P522 - 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>
P523 - 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.

#### 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 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

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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 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.

**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>
P523 - 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.