



State of Ohio Environmental Protection Agency

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

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 03-05740

Fac ID: 0326000160

DATE: 10/4/2007

Sauder Woodworking Company
Vaughn Bentz
502 Middle Street
Archbold, OH 43502

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

Sincerely

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/4/2007
Effective Date: 10/4/2007**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-05740

Application Number: **03-05740**
APS Premise Number: **0326000160**
Permit Fee: **\$400**
Name of Facility: **Sauder Woodworking Company Bentz**
Person to Contact: **Vaughn**
Address: **502 Middle Street
Archbold, OH 43502**

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

Description of modification:
Two 63.75 MMBTU/hr Wood/NG fired boilers w/multiple cyclone, ESP and SCR; one 16 TPH wood waste handling sys w/fab fil.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

PERMIT TO INSTALL FEE

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

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PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

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

P002

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Use of Fabric Filter and Compliance with the Limitations of this Permit.</u>
B008	63.75 MMBTU/Hr Wood/NG Fired Boiler	Use of Multiple Cyclone, ESP, SCR, and Compliance with the Limitations of this Permit.	
B009	63.75 MMBTU/Hr Wood/NG Fired Boiler	Use of Multiple Cyclone, ESP, SCR, and Compliance with the Limitations of this Permit.	
	16 TPH Wood Waste Handling System		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	DC			
	3745-31-05			
	3745-17-11	Permit Allowable Mass Emissions and/or Control/Usage Requirements		
	3745-17-07			
Applicable	3745-17-10			
Federal	3745-18-06			
& OAC Rules	3745-21-07			
	3745-21-08	PM .025 lb/MMBTU		
	3745-23-06	SO ₂ .01 lb/MMBTU		
		VOC .15 lb/MMBTU		
	3745-31-05	NO _x .2 lb/MMBTU		
40 CFR	3745-17-11	CO .45 lb/MMBTU		
60	3745-17-07			
Subpart DC				
3745-31-05				
3745-17-11				
3745-17-07		PM .025 lb/MMBTU		
3745-17-10		SO ₂ .01 lb/MMBTU		
3745-18-06		VOC .15 lb/MMBTU		
3745-21-07		NO _x .2 LB MMBTU		
3745-21-08		CO .45 LB/MMBTU		
3745-23-06				
		PM 0.07 lb.hr		
40 CFR				
60				
Subpart				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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**SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	13.96
SO ₂	5.58
NO _x	111.69
CO	251.30
VOC	83.76

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B008	63.75 MMBTU/hr Wood/NG Fired Boiler	DC
B009	63.75 MMBTU/hr Wood/NG Fired Boiler	DC

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

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- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and Northwest District Office
347 North Dunbridge Road
P.O. Box 466
Bowling Green, OH 43402

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Source

Pollutant(s)

B008 & B009

PM, NO_x, CO, VOC

MONITORING REQUIREMENTS

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A ****< MONITOR TYPE/NAME >**** monitor shall be installed on the ****< EMISSIONS UNIT ID >**** . The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

PSD REQUIREMENTS

The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Administrator of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

RECORD(S) RETENTION AND AVAILABILITY

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

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage,

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treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

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Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Sauder Woodworking Company shall not exceed the following maximum allowable emissions for B008 and B009:
 - .025 lb/MMBTU of actual heat input for particulates,
 - .01 lb/MMBTU of actual heat input for sulfur dioxide,
 - .15 lb/MMBTU of actual heat input for volatile organic compound,
 - .2 lb/MMBTU of actual heat input for nitrogen oxide,
 - .45 lb/MMBTU of actual heat input for carbon monoxide.
2. Sauder Woodworking Company shall install, calibrate, maintain and operate two Continuous Emission Monitors (CEM), one for measuring the opacity of the particulate emissions; the other to measure the amount of nitrogen oxide emissions discharged to the atmosphere by the two wood/N.G. fired boilers. The CEM monitor shall be in operation at all times when the boilers are being fired by wood. The CEM for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 (Appendix B). The span value of the opacity CEM shall be between 60 and 80 percent.
3. Sauder Woodworking Company shall submit an excess emission report for any calendar quarter for which there is excess emissions from either CEM monitor. This report shall be submitted by February 1, May 1, August 1 and November 1 of each year and cover the previous quarter.
4. Sauder Woodworking Company shall submit notification of the date of construction, anticipated start-up, and actual start-up. This notification shall include:
 - a. The design heat input capacity of the boilers and the fuels to be combusted in the boilers.
 - b. The annual capacity factor at which Sauder Woodworking Company anticipates operating the boilers based on all fuels fired and based on each individual fuel fire.
5. Sauder Woodworking shall initiate and implement an inspection and maintenance program designed to

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help ensure the control equipment is operating within the manufacturer's specifications. Such I and M program shall outline the specific items checked on a routine basis to ensure optimum operation of the cyclone, ESP and SCR for ensure optimum operation of the cyclone, ESP and SCR for B008 and B009. The I and M program shall be submitted to Ohio Environmental Protection Agency Northwest District Office in conjunction with the submittal of the sources' permit to operate applications.

6. Sauder Woodworking shall maintain daily records of the amount of sawdust burned (in lbs or tons). This facility shall install and operate a device to measure the amount of sawdust fired in B008 and B009.
7. This facility shall maintain monthly records for B008 and B009 which include the following information.
 - a. The number of days in operation
 - b. List of operating parameters as specified in condition number 6 to ensure the optimum operation of the cyclone, ESP and SCR air pollution control equipment.
8. Sauder Woodworking shall maintain records which summarize the information required in conditions 5, 6 and 7 for a minimum of two years. This report shall include the following information for B008 and B009:
 - a. The amount of sawdust (in lbs or tons) fired in the furnaces per hour;
 - b. The number of days of operation for each month;
 - c. The number of hours of operation; and
 - d. The list of operating parameters as specified in condition number 6.
9. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be submitted to or made to the following Ohio EPA field office:

Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43402-0466