

Schlabach Lumber

Facility ID# 02-38-00-0171

PTI Application No. 02-12560

November 12, 1998

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

1. PTI application 02-12560 is for the installation of the following wood processing equipment:
 - a. A log debarker and wood hogging system for debarking logs and processing wood waste, respectively (emissions unit F001). Fugitive emissions shall be controlled by wet suppression.
 - b. A sawdust pile for loading, unloading, and storing wood waste (emissions unit F002). Fugitive emissions shall be controlled by wet suppression and a curtain at the end of the loading conveyor to the pile.
 - c. A bandmill sawing operation for cutting wood (emissions unit P001). Particulate emissions shall be controlled by a cyclone.
2. Additional terms and conditions:
 - a. Log debarker and wood hogging system.
 - i. The permittee shall employ best available control measures for the log debarker and wood hogging system for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to performing wet suppression at the log debarker and wood hogging system. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - ii. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
 - b. Sawdust pile storage, load-in, and load-out.

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- i. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage pile for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to wet suppression and a curtain during load-in to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- ii. The above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- iii. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

B. Operational Restrictions

1. The control efficiencies of the wet suppression systems for the log debarker and the wood hogging operations (emissions unit F001) shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. Applicant shall maintain all wet suppression systems in good operating condition. The control efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed 10 percent opacity as a three minute average from either the log debarker or the wood hogging operations.
2. The control efficiency of the wet suppression system and the curtain at

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the end of the loading conveyor to the sawdust pile (emissions unit F002) shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust. Applicant shall maintain the wet suppression system and curtain in good operating condition. The control efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from sawdust pile loading, unloading, and storage except for one minute in any hour.

3. The collection efficiency of the air pollution capture hood for the bandmill sawing operation (emissions unit P001) shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at all points of capture. Applicant shall maintain all hoods and enclosures in good operating condition. The collection efficiency shall be considered adequate if visible particulate emissions of fugitive dust do not exceed 0 percent opacity from any building egress points and visible emissions from the cyclone do not exceed 20 percent opacity as a six minute average.

C. Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the following in accordance with the following frequencies:

minimum hogger inspection frequency
weekly

minimum load-in inspection frequency
weekly

minimum load-out inspection frequency
weekly

minimum wind erosion inspection frequency
weekly

2. No inspection shall be necessary for wind erosion from the surface of the storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the

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above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

3. The purpose of the storage pile inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of the storage pile, and wind erosion from the surface of the storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
4. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned requirements.
5. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 5.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, (iii) the pile surfaces (wind erosion), and (iv) the wood hogging operations, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation 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.

E. Testing Requirements

1. Bandmill sawing operation (emissions unit P001):
 - a. Emissions Limit: 0.53 lb/hr PM
Applicable Compliance Method: Compliance with the particulate matter emission limitations of 0.53 lb/hr shall be determined in accordance with OAC Rule 3745-17-03 (B) (10). No testing is specifically required by this permit but, if appropriate, may be required pursuant to OAC Rule 3745-15-04 (A). Such testing may be required at opacity levels less than those required by the allowable visible emission limit.

 - b. Emissions Limit: 2.3 tpy PM
Applicable Compliance Method: Compliance with the particulate matter emission limitation of 2.3 tpy shall be determined by calculations using design control efficiency of the cyclone and the amount of material collected by the cyclone.

 - c. Emissions Limit: 20% opacity
Applicable Compliance Method: Compliance with the visible

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emission limitation shall be determined by using U.S. EPA method 9, if required by the Ohio EPA.

2. Sawdust pile loading, unloading, and storage (emissions unit F002):
 - a. Emissions Limit: 1 tpy PM
Applicable Compliance Method: Compliance with the particulate matter emission limitation of 1 tpy shall be determined by calculations using design control efficiency of wet suppression and the curtain and the amount of material processed.
 - b. Compliance with the visible emission limitations for the storage pile identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(c) of OAC rule 3745-17-03.
3. Log debarker and wood hogging system (emissions unit F001):
 - a. Emissions Limit: 0.33 lb/hr PM
Applicable Compliance Method: Compliance with the particulate matter emission limitations of 0.33 lb/hr shall be determined by the following equation:
$$\text{lb/hr} = (\text{lb/hr from debarking} + \text{lb/hr from hogging}) \times (1 - .5)$$

where

$$\text{lb/hr from debarking} = \text{tons of logs debarked/hr} \times 0.024 \text{ lb/ton};$$
$$\text{lb/hr from hogging} = \text{tons of wood hogged/hr} \times 0.35 \text{ lb/ton};$$

0.5 represents the control efficiency of wet suppression of 50% from Ohio EPA's guidelines entitled "Reasonably Available Control Measures for Fugitive Dust Sources"; and

0.024 lb/ton and 0.35 lb/ton are emission factors for debarking and sawing, respectively, from Ohio EPA's guidelines entitled "Reasonably Available Control Measures for Fugitive Dust

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Sources".

- b. Emissions Limit: 1.5 tpy PM
Applicable Compliance Method: Compliance with the particulate matter emission limitation of 1.5 tpy shall be determined by calculations using design control efficiency of wet suppression and the amount of material processed.
- c. Compliance with the visible emission limitations for the wood hogging system identified above shall be determined in accordance with U.S. EPA Method 9, if required by the Ohio EPA.

F. Miscellaneous Requirements

None