☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **06-07761**

A. Source Description

Mill's Pride Limited Partnership (Mill's Pride) is a wooden cabinet manufacturing facility located in Waverly, Ohio in Pike County. Mill's Pride currently operates under a Title V permit (No. 0666010033) that was issued final on November 11, 2002 (effective date of December 11, 2002). The proposed project involves the installation of a new baghouse and modification/relocation of an existing baghouse at the facility to control emissions from woodworking operations located in the Truman Building.

The new baghouse #24 (OEPA Emission unit ID F037) will have an airflow capacity of 72,000 cubic feet per minute (cfm) and will be installed in the Truman Building. In addition, baghouse #20 (OEPA Emission unit ID F034) will be modified to increase the air flow capacity from 30,000 cfm(as currently permitted) to 72,000 cfm and will be relocated to the Truman Building.

B. Facility Emissions and Attainment Status

Pike County is in attainment with all the NAAQS; therefore, the Waverly Plant is not required to address NANSR for any pollutant.

The Mill's pride facility is an existing major source for PSD purpose (i.e., the plant has a potential to emit of greater than 250 tpy of PM).

C. Source Emissions

New Source

The new Baghouse #24 (F037) has not realized a period of normal operations. Therefore, the emissions increase for this unit is equivalent to its future allowable emissions in this PTI.

PTI allowable

0.004 gr/dscf X 72,000 dscfm X 60 minutes/hr X 1 lb/7000 gr X 6,230 hrs/yr X 0.0005 ton/lb = 7.49 tons/yr.

* Assuming that all controlled particulate emissions are PM_{10}, and an annual operational limit of 6,230 hours per based on a rolling twelve month summation contained in this PTI.

Modified Sources

The modified Baghouse #20 (F034) has realized a period of pre-modification normal operation. Therefore, the emissions increase for the modified source is determined based on the difference between future allowable emissions and baseline emissions. For purposes of this analysis, Mill's Pride has selected 2003/2004 as the baseline period for determining baseline actual emissions from Baghouse #20.

2003 - Baseline actual emissions 0.510 tpy
2004 - Baseline actual emissions 0.458 tpy
2003/2004 - Baseline actual emissions two year average 0.484 tpy

PTI allowable

0.004 gr/dscf X 72,000 dscfm X 60 minutes/hr X 1 lb/7000 gr X 6,230 hrs/yr X 0.0005 ton/lb = 7.49 tons/yr.

* Assuming that all controlled particulate emissions are PM_{10}, and an annual operational limit of 6,230 hours per based on a rolling twelve month summation contained in this PTI.

Silo #5 (F031) will experience an associated actual emissions increase as a result of the changes being made to the baghouses. The allowable emissions limit will not change. Associated emission sources have realized a period of normal operation. Therefore, the emission increase for the associated source is calculated based on the percent increase in production (actual to potential) associated with the modified sources. The emissions increase for Silo #5 is calculated as the difference between the projected actual emissions after the baghouse project and the baseline (2003/2004) actual emissions just prior to the baghouse project.

2003 - Baseline actual emissions 0.007 tpy
2004 - Baseline actual emissions 0.007 tpy
2003/2004 - Baseline actual emissions two year average 0.007 tpy
Estimated future actual emissions 0.11 tpy
Actual emissions increase 0.004

D. Conclusion

Based on the total allowable emission limits contained in this PTI for F034 and F037 of 15.38 tpy minus the 2003/3004 actual emissions of 0.484. The net emissions increase for the Truman Assembly Manufacturing Project for PM_{10} is 14.90 tpy. Therefore this project is not an "major modification" per OAC rule 3745-31-01 (III) and has not triggered PSD review.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
PIKE COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 06-07761
Fac ID: 0666010033

DATE: 4/12/2005

Mills Pride Limited Partnership
Debra Hannah
423 Hopewell Rd
Waverly, OH 45690-9700

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **SEDO** **KY** **WV**

PIKE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **06-07761** FOR AN AIR CONTAMINANT SOURCE FOR
Mills Pride Limited Partnership

On 4/12/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mills Pride Limited Partnership**, located at **423 Hopewell Rd, Waverly**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07761:

Woodworking Operations Baghouse 20.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]

DRAFT PERMIT TO INSTALL 06-07761

Application Number:	06-07761
Facility ID:	0666010033
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Mills Pride Limited Partnership
Person to Contact:	Debra Hannah
Address:	423 Hopewell Rd Waverly, OH 45690-9700

Location of proposed air contaminant source(s) [emissions unit(s)]:
423 Hopewell Rd
Waverly, Ohio

Description of proposed emissions unit(s):
Woodworking Operations Baghouse 20.

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

if applicable) 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

Pollutant	Tons Per Year
PE/PM/PM_{10}	15.38

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

None.

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

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F034 - Woodworking equipment vented to Baghouse 20	OAC rule 3745-31-05(A)(3)	The baghouse shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a 3-minute average. See A.I.2.a below.
	OAC rule 3745-31-05(C)	PE emissions from the baghouse stack shall not exceed 7.49 tons/yr as a rolling, 12-month summation.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitation specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures for the emissions unit 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 maintain enclosures and vent all the particulate emissions to a baghouse to ensure

compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

2.c For the purposes of this permit, PE shall be both particulate matter and particulate matter less than 10 µm.

II. Operational Restrictions

1. The permittee shall operate the baghouse at all times when this emissions unit is in operation.

2. The maximum number of operating hours for emissions unit F034 shall not exceed 6,230 hours as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Month(s)	Maximum Cumulative Operating Hours
1-1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952
1-9	6,230
1-10	6,230
1-11	6,230
1-12	6,230

After the first 12 calendar months of operation following the startup of emissions unit F034, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily 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. 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;
   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 emission incident; and
   e. any corrective actions taken to eliminate the visible emissions.

2. Notwithstanding the frequency of reporting requirements specified in section IV.1, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

   a. For 1 full quarter the facility's visual observations indicate no abnormal visible emissions; and

   b. The permittee continues to comply with all the record keeping and monitoring requirements specified in section III.1

   c. If abnormal visible emissions are observed, daily observations shall resume until 1 full quarter of the facility's visual observations indicate no abnormal visible emissions.

3. The permittee shall maintain monthly records of the following information:

   a. The hours of operation for F034 for each month;

   b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit; and

   c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

IV. Reporting Requirements

Emissions Unit ID: F034

1. The permittee shall submit semiannual written reports that (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 Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

   a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;

   b. Any exceedance of the rolling, 12-month hours of operation limitation.

   These deviation (excursion) reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation:
   The fabric filter shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases.

   Applicable Compliance Method:
   The permittee shall demonstrate compliance with the mass emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

   Initial compliance shall be based upon previous performance test conducted at the facility on similar baghouses.

   b. Emission Limitation:
   PE from the baghouse stack shall not exceed 7.49 tons/yr as a 12 month, rolling summation.

   Compliance Determination:
   Compliance with the tons/yr emission limitations shall be demonstrated by the following calculation based on the short term allowable emission rate of 0.004 grain of particulate emissions* per dry standard cubic foot of exhaust gases.

   0.004 gr/dscf X 72,000 dscfm X 60 minutes/hr X 1 lb/7000 gr X 6,230 hrs/yr X 0.0005 ton/lb = 7.49 tons/yr.

   c. Emission Limitation:
   Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a 3-minute average.

   Applicable Compliance Method:
   If required, compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 180 days after the initial startup date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 5.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southeast 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Southeast District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southeast District Office.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F034 - Woodworking equipment vented to Baghouse 20	None	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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F037 - Woodworking equipment vented to Baghouse 24	OAC rule 3745-31-05(A)(3)	The baghouse shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a 3-minute average. See A.I.2.a below.
	OAC rule 3745-31-05(C)	PE emissions from the baghouse stack shall not exceed 7.49 tons/yr as a rolling, 12-month summation.
	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)	The emission limitation specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The permittee shall employ best available control measures for the emissions unit 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 maintain enclosures and vent all the particulate emissions to a baghouse to ensure

compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

2.c For the purposes of this permit, PE shall be both particulate matter and particulate matter less than 10 µm.

II. Operational Restrictions

1. The permittee shall operate the baghouse at all times when this emissions unit is in operation.

2. The maximum number of operating hours for emissions unit F034 shall not exceed 6,230 hours as a rolling, 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Month(s)	Maximum Cumulative Operating Hours
1-1	744
1-2	1,488
1-3	2,232
1-4	2,976
1-5	3,720
1-6	4,464
1-7	5,208
1-8	5,952
1-9	6,230
1-10	6,230
1-11	6,230
1-12	6,230

After the first 12 calendar months of operation following the startup of emissions unit F034, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall perform daily 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. 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;
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 emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

2. Notwithstanding the frequency of reporting requirements specified in section IV.1, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

   a. For 1 full quarter the facility's visual observations indicate no abnormal visible emissions; and

   b. The permittee continues to comply with all the record keeping and monitoring requirements specified in section III.1

   c. If abnormal visible emissions are observed, daily observations shall resume until 1 full quarter of the facility's visual observations indicate no abnormal visible emissions.

3. The permittee shall maintain monthly records of the following information:

   a. The hours of operation for F034 for each month;

   b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit; and

   c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (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 Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

   a. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;

   b. Any exceedance of the rolling, 12-month hours of operation limitation.

   These deviation (excursion) reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation:
   The fabric filter shall achieve an outlet emission rate of not greater than 0.004 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases.

   Applicable Compliance Method:
   The permittee shall demonstrate compliance with the mass emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

   Initial compliance shall be based upon previous performance test conducted at the facility on similar baghouses.

   b. Emission Limitation:
   PE from the baghouse stack shall not exceed 7.49 tons/yr as a 12 month, rolling summation.

   Compliance Determination:
   Compliance with the tons/yr emission limitations shall be demonstrated by the following calculation based on the short term allowable emission rate of 0.004 grain of particulate emissions* per dry standard cubic foot of exhaust gases.

   0.004 gr/dscf X 72,000 dscfm X 60 minutes/hr X 1 lb/7000 gr X 6,230 hrs/yr X 0.0005 ton/lb = 7.49 tons/yr.

   c. Emission Limitation:
   Visible particulate emissions from the baghouse stack shall not exceed 5% opacity as a 3-minute average.

   Applicable Compliance Method:
   If required, compliance shall be demonstrated based upon the visible particulate emission observations specified in Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 180 days after the initial startup date.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 1 through 5.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southeast 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 test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Southeast District Office shall be permitted to witness the test(s), 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.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southeast District Office.

VI. Miscellaneous Requirements

None.

Emissions Unit ID: F037

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F037 - Woodworking equipment vented to Baghouse 24	None	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.