

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "06-08361"

- A. Source Description - Marlite is a major stationary source (VOC) who is installing a new line to process 4' x 8' sheets of MDF into "slotwall". This involves routing slots in the boards and trimming the edges with double end tenoners (DETs).
- B. Facility Emissions and Attainment Status - The facility currently emits less than 100 TPY of all pollutants and is located in Tuscarawas County, which is classified as Attainment for all pollutants.
- C. Source Emissions - The 2 DETs each are capable of generating 480 lb/hr of sawdust while the groover can generate 6240 lb/hr. This material is ducted to the baghouse which has a 99.9% efficiency. Marlite has requested a limit on the number of boards processed in any 12-month period such that emissions will not exceed 14.72 TPY total. Since every board does not have the maximum amount of material removed, actual emissions will be lower.
- D. Conclusion - The operational restrictions, emission limits, record keeping and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the potential to emit for this facility. The emissions for the project are limited to 14.72 tons of PE/PM₁₀ per year.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
TUSCARAWAS COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-08361

Fac ID: 0679010124

DATE: 1/3/2008

Marlite
Dan Schmidt
PO Box 250
Dover, OH 44622

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, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2750** 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

WV

PA

TUSCARAWAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 06-08361 FOR AN AIR CONTAMINANT SOURCE
FOR Marlite

On 1/3/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Marlite**, located at **202 Harger St, Dover**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-08361:

Two double end tendoners and a groover for processing slatwall.

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.

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 06-08361

Application Number: 06-08361
Facility ID: 0679010124
Permit Fee: **To be entered upon final issuance**
Name of Facility: Marlite
Person to Contact: Dan Schmidt
Address: PO Box 250
Dover, OH 44622

Location of proposed air contaminant source(s) [emissions unit(s)]:

**202 Harger St
Dover, Ohio**

Description of proposed emissions unit(s):

Two double end tendoner and a groover for processing slatwall.

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

Chris Korleski
Director

Marlite

Facility ID: 0679010124

PTI Application: 06-08361

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

Marlite**Facility ID: 0679010124****PTI Application: 06-08361****Issued: To be entered upon final issuance**

reports shall be submitted (i.e., postmarked) quarterly, 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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permittee shall comply with the requirement to register such a plan.

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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 re-issuance, or modification
- 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, 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 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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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

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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 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

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Facility ID: 0679010124

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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.

Marlite**Facility ID: 0679010124****PTI Application: 06-08361****Issued: To be entered upon final issuance****13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions**1. Compliance Requirements**

The emissions unit(s) identified in this Permit 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 (i.e., postmarked) quarterly, 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

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of any transfer of this permit.

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Marlite**Facility ID: 0679010124****PTI Application: 06-08361****Issued: To be entered upon final issuance****4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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

Marlite**Facility ID: 0679010124****PTI Application: 06-08361****Issued: To be entered upon final issuance**

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., postmarked), 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	14.72
PM ₁₀	14.72

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Facility ID: 0679010124

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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 - P038 - Torwegge number 1 double end tenoner controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section 2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	Particulate matter < 10 microns (PM ₁₀) from this emissions unit shall not exceed 0.98 tons as a rolling, 12-month summation. See section II.1. below.
OAC rule 3745-17-11(A) Figure II, P-2 curve	Particulate emissions (PE) from this emissions unit shall not exceed 43.28 lb/hr.
OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

- 2.a The Permit to Install (PTI) for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): a baghouse with a design control efficiency of 99.9%.

II. Operational Restrictions

1. The maximum production rate for this emissions unit shall not exceed 981,552 boards 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 production specified in the following chart:

<u>Month(s)</u>	<u>Maximum Cumulative Boards Processed</u>
1-1	178,560
1-2	357,120
1-3	535,680
1-4	714,240
1-5	892,800
1-6	981,552
1-7	981,552
1-8	981,552
1-9	981,552
1-10	981,552
1-11	981,552
1-12	981,552

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the production rate, in boards, for each month;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of boards processed; and,
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative number of boards processed for each calendar month.
2. 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following exceedances:

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- a. the rolling, 12-month production limitation; and
- b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production limitation.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).

2. 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 minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

Particulate emissions (PE) from this emissions unit shall not exceed 43.28 lb/hr. Particulate matter < 10 microns (PM₁₀) from this emissions unit shall not exceed 0.98 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hourly PE and annual PM₁₀ limitations are based on a mass balance of material to be removed from the product at the maximum production rate, and a control efficiency of 99.9% as provided in the permit to install application. The worst-case scenario is assumed: that PE = PM₁₀.

Compliance with the annual allowable particulate emissions limitation above is based on multiplying the maximum uncontrolled particulate emission rate (2 pounds per 4' x 8' board) by the design control efficiency of 99.9% (1-0.999), then by the maximum annual number of boards (981,552), and then dividing by 2000 pounds per ton.

$$(240 \text{ boards/hr}) (2.0 \text{ lb/board})(1 - 0.999) = 0.48 \text{ lb/hr}$$
$$(981,552 \text{ boards/yr}) (2.0 \text{ lb/board})(1 - 0.999)(0.0005 \text{ ton/lb}) = 0.98 \text{ tons/yr}$$

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If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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b. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

None

Marlite

DTL Application: 06 09264

Facility ID: 0679010124

Emissions Unit ID: P038

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 - P038 - Torwegge number 1 double end tenoner controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - P039 - Torwegge number 2 double end tenoner controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)(b)	See section 2.a below.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	Particulate matter < 10 microns (PM ₁₀) from this emissions unit shall not exceed 0.98 tons as a rolling, 12-month summation. See section II.1. below.
OAC rule 3745-17-11(A) Figure II, P-2 curve	Particulate emissions (PE) from this emissions unit shall not exceed 43.28 lb/hr.
OAC rule 3745-17-07(A)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

2. Additional Terms and Conditions

- 2.a The Permit to Install (PTI) for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3): a baghouse with a design control efficiency of 99.9%.

II. Operational Restrictions

1. The maximum production rate for this emissions unit shall not exceed 981,552 boards 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 production specified in the following chart:

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Cumulative Boards Processed</u>
1-1	178,560
1-2	357,120
1-3	535,680
1-4	714,240
1-5	892,800
1-6	981,552
1-7	981,552
1-8	981,552
1-9	981,552
1-10	981,552
1-11	981,552
1-12	981,552

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the production rate, in boards, for each month;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of boards processed; and,
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative number of boards processed for each calendar month.

2. 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month production limitation; and
 - b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production limitation.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).

2. 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 minimize or 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.

V. Testing Requirements

1. Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

Particulate emissions (PE) from this emissions unit shall not exceed 43.28 lb/hr. Particulate matter < 10 microns (PM₁₀) from this emissions unit shall not exceed 0.98 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hourly PE and annual PM₁₀ limitations are based on a mass balance of material to be removed from the product at the maximum production rate, and a control efficiency of 99.9% as provided in the permit to install application. The worst-case scenario is assumed: that PE = PM₁₀.

Compliance with the annual allowable particulate emissions limitation above is based on multiplying the maximum uncontrolled particulate emission rate (2 pounds per 4' x 8' board) by the design control efficiency of 99.9% (1-0.999), then by the maximum annual number of boards (981,552), and then dividing by 2000 pounds per ton.

$$(240 \text{ boards/hr}) (2.0 \text{ lb/board})(1 - 0.999) = 0.48 \text{ lb/hr}$$

$$(981,552 \text{ boards/yr}) (2.0 \text{ lb/board})(1 - 0.999)(0.0005 \text{ ton/lb}) = 0.98 \text{ tons/yr}$$

Issued: To be entered upon final issuance

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Issued: To be entered upon final issuance

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with the test methods and procedures in USEPA Method 9, which is located in 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - P039 - Torwegge number 2 double end tenoner controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

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

Marlite

DTL Application: 06 09264

Facility ID: 0679010124

Emissions Unit ID: P040

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 - P040 - Torwegge groover controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from this emissions unit shall not exceed 8.0 lb/hr; 12.76 tons per year. There shall be no visible particulate emissions from the baghouse stack.
OAC rule 3745-31-05(C) (synthetic minor to avoid PSD)	Particulate matter < 10 microns (PM ₁₀) from this emissions unit shall not exceed 12.76 tons as a rolling, 12-month summation. See section II.1. below.
OAC rule 3745-17-11(A)	The requirements of this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	The requirements of this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The maximum production rate for this emissions unit shall not exceed 981,552 boards 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 production specified in the following chart:

<u>Month(s)</u>	<u>Maximum Cumulative Boards Processed</u>
1-1	178,560
1-2	357,120
1-3	535,680
1-4	714,240
1-5	892,800

Issued: To be entered upon final issuance

1-6	981,552
1-7	981,552
1-8	981,552
1-9	981,552
1-10	981,552
1-11	981,552
1-12	981,552

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the production rate, in boards, for each month;
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of boards processed; and,
 - c. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative number of boards processed for each calendar month.
2. 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. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month production limitation; and

Issued: To be entered upon final issuance

- b. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative production limitation.

These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).

2. 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.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

Particulate emissions (PE) from this emissions unit shall not exceed 8.0 lb/hr; 12.76 tons per year.

Particulate matter < 10 microns (PM₁₀) from this emissions unit shall not exceed 12.76 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the hourly PE and rolling, 12-month PM₁₀ limitations are based on a mass balance of material to be removed from the product at the maximum production rate, and a control efficiency of 99.9% as provided in the permit to install application. It is assumed that PE = PM₁₀.

Compliance with the annual allowable particulate emissions limitation above is based on multiplying the maximum uncontrolled particulate emission rate (26 pounds per 4' x 8' board) by the design control efficiency of 99.9% (1-0.999), then by the maximum annual number of boards (981,552), and then dividing by 2000 pounds per ton.

$$(240 \text{ boards/hr}) (26.0 \text{ lb/board})(1 - 0.999) = 6.24 \text{ lb/hr}$$

Marlite

DTI Application: 06 08264

Facility ID: 0679010124

Emissions Unit ID: P040

 $(981,552 \text{ boards/yr}) (26.0 \text{ lb/board})(1 - 0.999)(0.0005 \text{ ton/lb}) = 12.76 \text{ tons/yr}$

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

There shall be no visible particulate emissions from the baghouse stack.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with the test methods and procedures in USEPA Method 22, which is located in 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - P040 - Torwegge groover controlled by a baghouse

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

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

NEW SOURCE REVIEW FORM B

PTI Number: 06-08361 Facility ID: 0679010124

FACILITY NAME Marlite

FACILITY DESCRIPTION Two double end tendoner and a groover for processing slatwall. CITY/TWP Dover

SIC CODE 2431 SCC CODE 30703096 EMISSIONS UNIT ID P038

EMISSIONS UNIT DESCRIPTION Torwegge number 1 double end tenoner

DATE INSTALLED after PTI issue

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.48 lb/hr	0.98	43.28 lb/hr	
PM ₁₀		0.48 lb/hr	0.98		0.98
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no NESHAP? no PSD? no OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

N/A

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 06-08361

Facility ID: 0679010124

FACILITY NAME Marlite

FACILITY DESCRIPTION Two double end tender and a

CITY/TWP Dover

Emissions Unit ID: P040

SIC CODE 2431

SCC CODE 30703096

EMISSIONS UNIT ID P039

EMISSIONS UNIT DESCRIPTION Torwegge number 2 double end tender

DATE INSTALLED after PTI issue

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.48 lb/hr	0.98	43.28 lb/hr	
PM ₁₀		0.48 lb/hr	0.98		0.98
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no

NESHAP? no

PSD? no

OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

N/A

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

3 NEW SOURCE REVIEW FORM B

PTI Number: 06-08361

Facility ID: 0679010124

FACILITY NAME Marlite

FACILITY DESCRIPTION Two double end tender and a

CITY/TWP Dover

Emissions Unit ID: P040

SIC CODE 2431

SCC CODE 30703096

EMISSIONS UNIT ID P040

EMISSIONS UNIT DESCRIPTION Torwegge groover

DATE INSTALLED after PTI issue

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		6.24 lb/hr	12.76	8.0 lb/hr	12.76
PM ₁₀		6.24 lb/hr	12.76	8.0 lb/hr	12.76
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? no

NESHAP? no

PSD? no

OFFSET POLICY? no

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Baghouse of 99.9% eff.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

YES

X NO

IDENTIFY THE AIR CONTAMINANTS: