State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL** **CERTIFIED MAIL**
**TUSCARAWAS COUNTY**

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**Application No: 06-08361**
**Fac ID:** 0679010124
**DATE: 2/21/2008**

Marlite
Dan Schmidt
PO Box 250
Dover, OH 44622

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

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **SEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 2/21/2008** |
| **Terms and Conditions** | **Effective Date: 2/21/2008** |

**FINAL PERMIT TO INSTALL 06-08361**

| | |
|---|---|
| Application Number: | 06-08361 |
| Facility ID: | 0679010124 |
| Permit Fee: | **$2750** |
| Name of Facility: | Marlite |
| Person to Contact: | Dan Schmidt |
| Address: | PO Box 250<br>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

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (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 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 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 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 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 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**

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.

**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 of any transfer of this permit.

**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**

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

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

| Pollutant | Tons Per Year |
|---|---|
| PE | 14.72 |
| $PM_{10}$ | 14.72 |

## 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

Emissions Unit ID: P038

**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.<br><br>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:

Emissions Unit ID: P038

| Month(s) | Maximum Cumulative Boards Processed |
|---|---|
| 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:

Emissions Unit ID: P038

**Issued: 2/21/2008**

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 ($PM_{10}$) 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 $PM_{10}$ 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 = $PM_{10}$.

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 boards/hr) (2.0 lb/board)(1 - 0.999) = 0.48 lb/hr

Emissions Unit ID: P038

(981,552 boards/yr) (2.0 lb/board)(1 - 0.999)(0.0005 ton/lb) = 0.98 tons/yr

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.

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: 2/21/2008**

## 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 |
|---|---|
| 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

**Issued: 2/21/2008**

**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.<br><br>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:

| Month(s) | Maximum Cumulative Boards Processed |
|---|---|
| 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 ($PM_{10}$) 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 $PM_{10}$ 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 = $PM_{10}$.

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 boards/hr) (2.0 lb/board)(1 - 0.999) = 0.48 lb/hr

Emissions Unit ID: P039

(981,552 boards/yr) (2.0 lb/board)(1 - 0.999)(0.0005 ton/lb) = 0.98 tons/yr

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.

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: 2/21/2008**

## 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 |
|---|---|
| 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

**Issued: 2/21/2008**

**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.<br><br>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.<br><br>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:

Emissions Unit ID: P040

| Month(s) | Maximum Cumulative Boards Processed |
|---|---|
| 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 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 ($PM_{10}$) 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 $PM_{10}$ 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 = $PM_{10}$.

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 boards/hr) (26.0 lb/board)(1 - 0.999) = 6.24 lb/hr
(981,552 boards/yr) (26.0 lb/board)(1 - 0.999)(0.0005 ton/lb) = 12.76 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

Emissions Unit ID: P040

## 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 |
|---|---|
| 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