



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

02/06/02

**CERTIFIED MAIL**

**RE: Draft Title V Chapter 3745-77 permit**

06-66-01-0033  
Mill's Pride, Inc.  
Debbie Hannah  
423 Hopewell Road  
Waverly, OH 45690

Dear Debbie Hannah:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Southeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Southeast District Office.**

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA (electronically submitted)  
File, DAPC PMU  
Southeast District Office  
Kentucky  
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/06/02

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 06-66-01-0033 to:
Mill's Pride, Inc.
423 Hopewell Road
Waverly, OH 45690

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like B001 (Boiler #1), F018 (Baghouse #12), F031 (Silo #5), etc.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

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 record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. 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.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## **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 condition, of any emissions unit(s) 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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 emissions unit(s) that is (are) served by such control system(s).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## 6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## 8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
  - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.  
*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### 13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

### 14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

### 15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

### 16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(Authority for term: OAC rule 3745-77-07(I))*

#### **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

#### **18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**2. Records Retention Requirements**

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.

**3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish

to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

### **B. State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

P014 - hymmen line isopress;  
R006 - vaccum Line Finishing System # 1;  
R008 - vaccum Line Finishing System # 2;  
Z001 - wood drying;  
Z002 - hymmen line isopress;  
Z003 - hymmen line isopress;  
Z004 - gasoline dispensing facility;  
Z005 - cold solvent cleaner;  
Z006 - grinding operation;  
Z007 - grinding operation;  
Z008 - grinding operation; and  
Z009 - grinding operation.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #1 (B001)

**Activity Description:** 26.8 MMBTU/hr wood-waste fired boiler

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
26.8 mmBtu/hr boiler fired with natural gas and/or wood waste and controlled with twin multiclone collectors	OAC rule 3745-31-05(A)(3) (PTI 06-1908)	0.20 pound of particulate emissions per mmBtu of actual heat input  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and/or wood waste as fuel in this emissions unit.
- The pressure drop across the multiclones shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee burns a fuel other than natural gas or wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the multiclones while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclones on a daily basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclones did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

- 1.b Emission Limitation:

0.20 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted once during each calendar year.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #2 (B002)

**Activity Description:** 26.8 MMBTU/hr wood-waste fired boiler

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
26.8 mmBtu/hr boiler fired with natural gas and/or wood waste and controlled with twin multiclone collectors	OAC rule 3745-31-05(A)(3) (PTI 06-2083)	0.20 pound of particulate emissions per mmBtu of actual heat input  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and/or wood waste as fuel in this emissions unit.
- The pressure drop across the multiclones shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee burns a fuel other than natural gas or wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the multiclones while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclones on a daily basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclones did not comply with the allowable range specified above.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

**1.b** Emission Limitation:

0.20 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted once during each calendar year.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #4 (B006)

**Activity Description:** 29.8 MM BTU/hr Wood Fired Thermal Heater (Vortex) (Source still under construction)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
25 mmBtu/hr thermal fluid heater boiler #3 (Vortex) fired with natural gas and/or wood waste with twin multiclone collectors	OAC rule 3745-31-05(A)(3) (PTI 06-4093)	4.40 lbs/hr of particulate emissions
		0.176 pound of particulate emissions per mmBtu of actual heat input
		19.27 tpy of particulate emissions
		The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and/or wood waste as fuel in this emissions unit.
- The pressure drop across the multiclones shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee burns a fuel other than natural gas and/or wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### **III. Monitoring and/or Record Keeping Requirements (continued)**

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the multiclones while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclones on a daily basis.
3. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclones did not comply with the allowable range specified above.  
  
The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### **V. Testing Requirements**

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.
  - 1.b Emission Limitations:  
  
4.40 lbs/hr of particulate emissions  
0.176 pound of particulate emissions per mmBtu of actual heat input  
  
Applicable Compliance Method:  
  
Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.
  - 1.c Emission Limitation:  
  
19.27 tpy of particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated by multiplying the results of the most recent emission testing, in lbs/hr, by the actual hours of operation during the calendar year, and then dividing by 2000 lbs/ton.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months of the restart of this emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<b>Operations, Property, and/or Equipment</b>	<b>Applicable Rules/ Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #1 (F001)

**Activity Description:** Wood Waste Baghouse #1

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #1	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #1 (F001)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #2 (F002)

**Activity Description:** Wood Waste Baghouse #2

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #2	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**

Facility ID: **06-66-01-0033**

Emissions Unit: **Baghouse #2 (F002)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #3 (F003)

**Activity Description:** Wood Waste Baghouse #3

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #3	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #3 (F003)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #6 (F004)  
**Activity Description:** Wood Waste Baghouse #6

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #6	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #6 (F004)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #5 (F005)  
**Activity Description:** Wood Waste Baghouse #5

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #5	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #5 (F005)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Silo #1 (F012)

**Activity Description:** Storage and pneumatic conveying of sawdust and wood scrap

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wood waste storage - Silo # 1 - vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-3744)	0.030 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.2 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

### III. Monitoring and/or Record Keeping Requirements (continued)

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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal 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 Director (the appropriate Ohio EPA District Office or local air agency) 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 limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.030 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance may be determined using AIRS facility emission factors as follows:

$$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (7,000 \text{ gr/lb}) \cdot (\text{hour}/60 \text{ minutes}) \cdot (\text{minute}/\text{max air flow}) = \text{gr/dscf}$$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Silo #1 (F012)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Silo #2 (F013)

**Activity Description:** Storage and pneumatic conveying of sawdust and wood scrap

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wood waste storage - Silo # 1 - vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-3744)	0.030 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.2 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

### III. Monitoring and/or Record Keeping Requirements (continued)

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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal 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 Director (the appropriate Ohio EPA District Office or local air agency) 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 limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.030 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance may be determined using AIRS facility emission factors as follows:

$$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (7,000 \text{ gr/lb}) \cdot (\text{hour}/60 \text{ minutes}) \cdot (\text{minute}/\text{max air flow}) = \text{gr/dscf}$$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Silo #2 (F013)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #7 (F015)

**Activity Description:** Wood Waste Baghouse #7

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #7	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #4 (F016)  
**Activity Description:** Wood Waste Baghouse #4

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #4	OAC rule 3745-31-05(A)(3) (PTI 06-4445)	0.005 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.005 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #4 (F016)**

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #11 (F017)  
**Activity Description:** Wood Waste Baghouse #11

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #11	OAC rule 3745-31-05(A)(3) (PTI 06-4265)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #11 (F017)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #12 (F018)  
**Activity Description:** Wood Waste Baghouse #12

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #12	OAC rule 3745-31-05(A)(3) (PTI 06-4265)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
  - 1.a Emission Limitation:  
  
0.004 gr/dscf of particulate emissions in the exhaust gases  
  
Applicable Compliance Method:  
  
Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.
  - 1.b Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #12 (F018)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #13 (F019)  
**Activity Description:** Wood Waste Baghouse #13

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #13	OAC rule 3745-31-05(A)(3) (PTI 06-4265)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #13 (F019)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #8 (F020)  
**Activity Description:** Wood Waste Baghouse #8

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #8	OAC rule 3745-31-05(A)(3) (PTI 06-4093)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## **V. Testing Requirements (continued)**

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Baghouse #9 (F021)  
**Activity Description:** Wood Waste Baghouse #9

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #9	OAC rule 3745-31-05(A)(3) (PTI 06-4093)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## **V. Testing Requirements (continued)**

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Baghouse #10 (F022)  
**Activity Description:** Wood Waste Baghouse #10

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #10	OAC rule 3745-31-05(A)(3) (PTI 06-4093)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Silo #3 (F023)

**Activity Description:** Wood Waste Storage Silo

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wood waste storage - Silo #3 - vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-3744)	0.030 gr/dscf of particulate emissions from the baghouse exhaust  11 tons per year of particulate emissions  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.2 to 6 inches of water while the emissions unit is in operation.

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall maintain the following records for this emissions unit:
  - a. the actual annual operating hours;
  - b. the total actual annual amount of wood waste processed, in lbs and tons; and
  - c. the average amount of wood waste processed per hour, in lbs/hr (average).

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

0.030 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance may be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (7,000 \text{ gr/lb}) \cdot (\text{hour}/60 \text{ minutes}) \cdot (\text{minute}/\text{max air flow}) = \text{gr/dscf}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

### 1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

### 1.c Emission Limitation:

11 tons per year of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (\text{hr}/\text{year}) \cdot (0.0005 \text{ ton/lb}) = \text{tons per year}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Silo #4 (F024)

**Activity Description:** Wood Waste Storage Silo

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wood waste storage - Silo #4 - vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-4093)	0.008 gr/dscf of particulate emissions from the baghouse exhaust  0.04 ton per year of particulate emissions  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.2 to 6 inches of water while the emissions unit is in operation.

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall maintain the following records for this emissions unit:
  - a. the actual annual operating hours;
  - b. the total actual annual amount of wood waste processed, in lbs and tons; and
  - c. the average amount of wood waste processed per hour, in lbs/hr (average).

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

0.008 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance may be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (7,000 \text{ gr/lb}) \cdot (\text{hour}/60 \text{ minutes}) \cdot (\text{minute}/\text{max air flow}) = \text{gr/dscf}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

### 1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

### 1.c Emission Limitation:

0.04 ton per year of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \cdot (.01^*) \cdot (\text{hr}/\text{year}) \cdot (0.0005 \text{ ton/lb}) = \text{tons per year}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #14 (F025)  
**Activity Description:** Wood Waste Baghouse #14

### A. State and Federally Enforceable Section

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #14	OAC rule 3745-31-05(A)(3) (PTI 06-4761)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  See A.I.2.a below.  The requirements of this rule also include compliance with OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

#### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

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

a. The emission testing shall be conducted within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Baghouse #14 (F025)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #15 (F026)  
**Activity Description:** Wood Waste Baghouse #15

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #15	OAC rule 3745-31-05(A)(3) (PTI 06-4804)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #16 (F027)  
**Activity Description:** Wood Waste Baghouse #16

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #16	OAC rule 3745-31-05(A)(3) (PTI 06-4808)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #17 (F028)

**Activity Description:** Wood Waste Baghouse #17

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #17	OAC rule 3745-31-05(A)(3) (PTI 06-4808)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  10.82 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

10.82 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #18 (F029)  
**Activity Description:** Wood Waste Baghouse #18

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #18	OAC rule 3745-31-05(A)(3) (PTI 06-4808)	0.004 gr/dscf of particulate emissions from the baghouse exhaust  8.41 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.004 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

8.41 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Baghouse #7A (F030)  
**Activity Description:** Wood Waste Baghouse #7A

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking equipment vented to Baghouse #7A	OAC rule 3745-31-05(A)(3) (PTI 06-4808)	0.008 gr/dscf of particulate emissions from the baghouse exhaust  3.16 tons of particulate emissions per year  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
2. The permittee shall maintain records of the actual annual operating hours for this emissions unit.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

0.008 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance shall be determined through emission tests performed in accordance with the methods and procedures specified in section A.V.2.

**1.b** Emission Limitation:

3.16 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be determined by using the following equation:

$$\text{TER} * 72,000 \text{ acfm} * 60 \text{ min/hr} * 1/7000 \text{ gr/lb} * \text{actual hours of operation per year} * 0.0005 \text{ ton/lb} = \text{tpy}$$

where:

TER = tested emission rate per section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 12 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Silo #5 (F031)  
**Activity Description:** Wood Waste Storage Silo

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wood waste storage - Silo #5 - vented to a baghouse	OAC rule 3745-31-05(A)(3) (PTI 06-4808)	0.030 gr/dscf of particulate emissions from the baghouse exhaust  11.04 tons per year of particulate emissions  See A.I.2.a below.
	OAC rule 3745-17-07(A)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).  Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures for the emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain enclosures and vent all the particulate emissions to a baghouse to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.2 to 6 inches of water while the emissions unit is in operation.

### **III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.
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. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
3. The permittee shall maintain the following records for this emissions unit:
  - a. the actual annual operating hours;
  - b. the total actual annual amount of wood waste processed, in lbs and tons; and
  - c. the average amount of wood waste processed per hour, in lbs/hr (average).

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal 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 Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

0.030 gr/dscf of particulate emissions in the exhaust gases

Applicable Compliance Method:

Compliance may be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \times (.01^*) \times (7,000 \text{ gr/lb}) \times (\text{hour}/60 \text{ minutes}) \times (\text{minute}/\text{max air flow}) = \text{gr/dscf}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

### 1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

### 1.c Emission Limitation:

11.04 tons per year of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using AIRS facility emission factors as follows:

$(EF \times \text{tons wood waste/hour}) \times (.01^*) \times (\text{hr}/\text{year}) \times (0.0005 \text{ ton/lb}) = \text{tons per year}$

EF = 1.78 lbs per ton of wood waste

3-07-030-01 wood waste storage bin vent 0.58 lb PM10 per ton of wood waste

3-07-030-02 wood waste storage bin loadout 1.2 lbs PM10 per ton of wood waste

total uncontrolled emissions equal 1.78 lbs per ton of wood waste

\*baghouse operating efficiency 99%

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Flatline Finishing System (K001)

**Activity Description:** Coating line for fronts of cabinets consisting of 5 spray booths, 1 dryer and 2 curing ovens

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
flatline finishing system (system includes 3 spray booths, 1 drying oven, and 2 curing ovens) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(1)	The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)(a)	See A.I.2.a below. The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions shall not exceed 40.94 lbs/hr and 74.08 tons/yr.  Particulate emissions shall not exceed 2.41 tons/yr.
		See A.I.2.a below.  Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B).

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(D) PTI # 06-06474	See A.I.2.b below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B) (Table 1)	Particulate emissions shall not exceed 0.551 lb/hr.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.  
  
These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

**II. Operational Restrictions**

- 1.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2.** The permittee shall operate the spray booth dry filtration system(s) whenever this emissions unit is in operation.

**III. Monitoring and/or Record Keeping Requirements**

- 1.** The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- c. All time periods when the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating, thinner, and cleanup material employed.
  - b. The number of gallons of each coating, thinner, and cleanup material employed.
  - c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
  - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
  - e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - f. The hours of operation of the emissions unit.
  - g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions unit ((e)/(f)).
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons ((a)x(b)x(0.0005 ton/lb)).
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of (a)x(e)x(0.0005 ton/lb)).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.  
  
The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall also submit annual reports that specify the total VOC and particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

**1.a** Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

**1.b** Emission Limitation:

VOC emissions shall not exceed 40.94 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.d.

**1.c** Emission Limitation:

VOC emissions shall not exceed 74.08 tons/yr

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

## V. Testing Requirements (continued)

### 1.d Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## V. Testing Requirements (continued)

### 1.e Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 1.f Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used:

$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$

$E = \text{particulate emission rate (lb/hr)}$

$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.}$

$CE = \text{control efficiency of the control equipment (i.e., booth filters)}$

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

### 1.g Emission Limitation:

Particulate emissions shall not exceed 2.41 tons/yr.

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly particulate emission limitation by 8760 and dividing by 2000 lbs/ton. Compliance with this emission limitation will be demonstrated provided that the permittee complies with the hourly particulate emission limitation.

## 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Vinyl Line #1 (K002)  
**Activity Description:** Vinyl Laminating

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
vinyl laminating line - Line #1	OAC rule 3745-31-05(A)(3) (PTI 06-5181)	Emissions of volatile organic compounds (VOC), including cleanup, shall not exceed 48.36 lbs/day and 8.9 tons/yr.  The VOC contents of the coatings shall not exceed 0.13 pound of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(H)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 06-06474)	See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The VOC content limitation required by OAC rule 3745-21-09(H) is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.

##### II. Operational Restrictions

None

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the total VOC emission rate from all coatings employed, in pounds;
  - e. the name and identification of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the number of gallons of each cleanup material employed;
  - h. the total VOC emissions from all cleanup materials employed, in pounds; and
  - i. the total VOC emissions from all coatings and cleanup materials, in pounds.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total number of gallons of each coating and cleanup material employed.
  - b. The individual HAP content of each coating and cleanup material, in pounds per gallon.
  - c. The total emission rate for each individual HAP, in tons ((a)x(b)x(0.0005 ton/lb)).
  - d. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - e. The total emission rate for all HAPs combined, in tons (the sum of (a)x(d)x(0.0005 ton/lb)).
3. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.1.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average daily VOC emission rate exceeded 48.36 lbs/day, and the actual average daily VOC emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

0.13 pound of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the VOC contents of the coatings.

- 1.b Emission Limitation:

48.36 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.c Emission Limitation:

8.9 tons/yr of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section A.III.1 and the following calculation:

$$\text{VOC in tons/yr} = \text{summation of A.III.1.i for each day during the calendar year} / 2000 \text{ lbs/ton.}$$

- 1.d Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.2 and A.III.3.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Vinyl Line #2 (K003)

**Activity Description:** Vinyl Laminating

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
vinyl laminating line - Line #2	OAC rule 3745-31-05(A)(3) (PTI 06-5181)	Emissions of volatile organic compounds (VOC), including cleanup, shall not exceed 72.48 lbs/day and 13.3 tons/yr.  The VOC contents of the coatings shall not exceed 0.13 pound of VOC per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-09(H)	See A.I.2.a below.
	OAC rule 3745-31-05(D) (PTI 06-06474)	See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The VOC content limitation required by OAC rule 3745-21-09(H) is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.

##### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied;
  - c. the number of gallons of each coating employed;
  - d. the total VOC emission rate from all coatings employed, in pounds;
  - e. the name and identification of each cleanup material employed;
  - f. the VOC content of each cleanup material, in pounds per gallon;
  - g. the number of gallons of each cleanup material employed;
  - h. the total VOC emissions from all cleanup materials employed, in pounds; and
  - i. the total VOC emissions from all coatings and cleanup materials, in pounds.
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total number of gallons of each coating and cleanup material employed.
  - b. The individual HAP content of each coating and cleanup material, in pounds per gallon.
  - c. The total emission rate for each individual HAP, in tons ((a)x(b)x(0.0005 ton/lb)).
  - d. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - e. The total emission rate for all HAPs combined, in tons (the sum of (a)x(d)x(0.0005 ton/lb)).
3. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.1.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average daily VOC emission rate exceeded 72.48 lbs/day, and the actual average daily VOC emission rate for each such day.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii.

4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

0.13 pound of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Method 24 shall be used to determine the VOC contents of the coatings.

- 1.b Emission Limitation:

72.48 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

- 1.c Emission Limitation:

13.3 tons/yr of VOC

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section A.III.1 and the following calculation:

VOC in tons/yr = summation of A.III.1.i for each day during the calendar year / 2000 lbs/ton.

- 1.d Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.2 and A.III.3.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Specialty Booth (R001)  
**Activity Description:** Spray booth for miscellaneous parts coating

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
specialty booth finishing system (system includes 1 spray booth) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(6)(a)	The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions shall not exceed 4.10 lbs/hr and 2.01 tons/yr.  Particulate emissions shall not exceed 2.41 tons/yr.
	OAC rule 3745-31-05(D) PTI # 06-06474	See A.I.2.a below. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B). See A.I.2.b below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B) (Table 1)	Particulate emissions shall not exceed 0.551 lb/hr.

**2. Additional Terms and Conditions**

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.  
  
These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

**II. Operational Restrictions**

- 1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall operate the spray booth dry filtration system(s) whenever this emissions unit is in operation.

**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- c. All time periods when the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating, thinner, and cleanup material employed.
  - b. The number of gallons of each coating, thinner, and cleanup material employed.
  - c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
  - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
  - e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - f. The hours of operation of the emissions unit.
  - g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions unit ((e)/(f)).
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons ((a)x(b)x(0.0005 ton/lb)).
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of (a)x(e)x(0.0005 ton/lb)).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall also submit annual reports that specify the total VOC and particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### V. Testing Requirements

**1.a** Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

**1.b** Emission Limitation:

VOC emissions shall not exceed 4.10 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.d.

**1.c** Emission Limitation:

VOC emissions shall not exceed 2.01 tons/yr

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

## V. Testing Requirements (continued)

### 1.d Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## V. Testing Requirements (continued)

### 1.e Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 1.f Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$$

$$E = \text{particulate emission rate (lb/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = control efficiency of the control equipment (i.e., booth filters)

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

### 1.g Emission Limitation:

Particulate emissions shall not exceed 2.41 tons/yr.

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly particulate emission limitation by 8760 and dividing by 2000 lbs/ton. Compliance with this emission limitation will be demonstrated provided that the permittee complies with the hourly particulate emission limitation.

### 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cefla Line Finishing System (Stain Roll Coater) (R002)

**Activity Description:** Coating Line for cabinets consisting of 3 rollcoaters and 3 ultraviolet curing ovens; this source is the stain roll coater/oven.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cefla line finishing system - stain roll coater and oven - (system includes 1 roll coater and 1 ultraviolet curing oven) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(1)	The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)(a)	See A.I.2.a below. The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr and 7.47 tons/yr.
	OAC rule 3745-31-05(D) PTI # 06-06474	See A.I.2.a below. See A.I.2.b below.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.
- These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for emissions units R002, R003, and R004:
- a. The company identification for each coating, thinner, and cleanup material employed.
- b. The number of gallons of each coating, thinner, and cleanup material employed.
- c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
- d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
- e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
- f. The hours of operation of the emissions units.
- g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions units ((e)/(f)).

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for emissions units R002, R003, and R004:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons  $((a) \times (b) \times (0.0005 \text{ ton/lb}))$ .
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of  $(a) \times (e) \times (0.0005 \text{ ton/lb})$ ).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units R002, R003, and R004 for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

**1.a** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.c.

**1.b** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 7.47 tons/yr.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

**1.c** Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

## V. Testing Requirements (continued)

- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

### 1.d Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cefla Line Finishing System ( Roll Coater #1/UV Lamp) (R003)

**Activity Description:** Coating line for cabinets consisting of 3 roll coaters and 3 ovens; this source is the roll coater #1 and UV lamp.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cefla line finishing system - Roll Coater #1 and ultraviolet lamp - (system includes 1 roll coater and 1 ultraviolet curing oven) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(1)	The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)(a)	See A.I.2.a below. The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr and 7.47 tons/yr.
	OAC rule 3745-31-05(D) PTI # 06-06474	See A.I.2.a below. See A.I.2.b below.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.
- These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for emissions units R002, R003, and R004:
- a. The company identification for each coating, thinner, and cleanup material employed.
- b. The number of gallons of each coating, thinner, and cleanup material employed.
- c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
- d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
- e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
- f. The hours of operation of the emissions units.
- g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions units ((e)/(f)).

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for emissions units R002, R003, and R004:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons  $((a) \times (b) \times (0.0005 \text{ ton/lb}))$ .
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of  $(a) \times (e) \times (0.0005 \text{ ton/lb})$ ).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units R002, R003, and R004 for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

**1.a** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.c.

**1.b** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 7.47 tons/yr.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

**1.c** Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

## V. Testing Requirements (continued)

- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

### 1.d Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Cefla Line Finishing System (Roll Coater #2/UV Lamp) (R004)

**Activity Description:** Coating line for cabinets consisting of 3 roll coaters and 3 ovens; this source is the roll coater #2 and UV lamp.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cefla line finishing system - Roll Coater #2 and ultraviolet lamp - (system includes 1 roll coater and 1 ultraviolet curing oven) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(1)	The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(6)(a)	See A.I.2.a below. The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr and 7.47 tons/yr.
	OAC rule 3745-31-05(D) PTI # 06-06474	See A.I.2.a below. See A.I.2.b below.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.
- These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the following information each day for emissions units R002, R003, and R004:
- a. The company identification for each coating, thinner, and cleanup material employed.
- b. The number of gallons of each coating, thinner, and cleanup material employed.
- c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
- d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
- e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
- f. The hours of operation of the emissions units.
- g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions units ((e)/(f)).

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information each month for emissions units R002, R003, and R004:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons  $((a) \times (b) \times (0.0005 \text{ ton/lb}))$ .
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of  $(a) \times (e) \times (0.0005 \text{ ton/lb})$ ).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions units were in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.

#### **IV. Reporting Requirements (continued)**

4. The permittee shall also submit annual reports that specify the total VOC emissions from emissions units R002, R003, and R004 for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

**1.a** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 2.05 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.c.

**1.b** Emission Limitation:

VOC emissions from emissions units R002, R003, and R004, combined, shall not exceed 7.47 tons/yr.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

**1.c** Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

## V. Testing Requirements (continued)

- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

### 1.d Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

Facility Name: **Mill's Pride Limited Partnership**  
Facility ID: **06-66-01-0033**  
Emissions Unit: **Cefla Line Finishing System (Roll Coater #2/UV Lamp) (**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Backline Finishing System (R011)

**Activity Description:** Coating line for backs of cabinet doors consisting fo a spray booth and drying oven

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
backline finishing system (system includes 2 spray booths and 2 infrared drying ovens) controlled by a regenerative thermal oxidizer	OAC rule 3745-21-07(G)(6)(a)	The emission reduction requirement specified in this rule (90% or more of the carbon in the organic material being incinerated) is less stringent to the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below. The emission reduction requirement specified in this rule (85% overall control efficiency) is less stringent than the emission reduction requirement established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI # 06-06474	See A.I.2.a below. Volatile organic compound (VOC) emissions shall not exceed 10.85 lbs/hr and 45.34 tons/yr.  Particulate emissions shall not exceed 2.41 tons/yr.
	OAC rule 3745-31-05(D) PTI # 06-06474 OAC rule 3745-17-07(A)	See A.I.2.a below. Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B). See A.I.2.b below.  Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-11(B) (Table 1)	Particulate emissions shall not exceed 0.551 lb/hr.

## 2. Additional Terms and Conditions

- 2.a** The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.
- 2.b** The total facility hazardous air pollutant (HAP) emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.
- These facility emission limitations were established pursuant to OAC rule 3745-31-05(D), in order to exempt this facility from the applicable maximum achievable control technology requirements specified in 40 CFR Part 63, Subpart JJ.
- 2.c** The VOC emissions from emissions units K001, R001, R002, R003, R004, and R011 are all vented to the same RTO.

## II. Operational Restrictions

1. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall operate the spray booth dry filtration system(s) whenever this emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the RTO when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- c. All time periods when the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation.

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The company identification for each coating, thinner, and cleanup material employed.
  - b. The number of gallons of each coating, thinner, and cleanup material employed.
  - c. The VOC content of each coating, thinner, and cleanup material, in pounds per gallon, excluding water.
  - d. The total uncontrolled VOC emission rate in pounds (the sum of (b)x(c) for all coatings, thinners, and cleanup materials employed).
  - e. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in pounds (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - f. The hours of operation of the emissions unit.
  - g. The calculated average hourly emission rate, in pounds per hour, calculated by dividing the controlled emission rate by the actual hours of operation of the emissions unit ((e)/(f)).
3. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The total number of gallons of each coating, thinner, and cleanup material employed.
  - b. The individual HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - c. The total uncontrolled emission rate for each individual HAP, in tons ((a)x(b)x(0.0005 ton/lb)).
  - d. The total controlled emission rate for each individual HAP, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - e. The combined HAP content of each coating, thinner, and cleanup material, in pounds per gallon.
  - f. The total uncontrolled emission rate for all HAPs combined, in tons (the sum of (a)x(e)x(0.0005 ton/lb)).
  - g. The total controlled emission rate for all HAPs combined, in tons (i.e., calculated using the overall control efficiency from the most recent emission test that demonstrated the emissions unit was in compliance).
  - h. The total controlled VOC emission rate for all coatings, thinners, and cleanup materials, in tons (i.e., the sum of the daily values from section A.III.2.e, divided by 2000 lbs/ton).
4. The permittee shall collect and record the following information each month for all of the affected emissions units at the facility:
  - a. The total individual HAP emission rate, in tons (i.e., the summation of the individual HAP emissions for each affected emissions unit at the facility).
  - b. The total combined HAP emission rate, in tons (i.e., the summation of the combined HAP emissions for each affected emissions unit at the facility).
  - c. The rolling, 12-month summation of the individual HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).
  - d. The rolling, 12-month summation of the combined HAP emissions, in tons (i.e., the emission rate for the current month added to the emission rate for the previous 11 calendar months).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. Any exceedances of the hourly VOC emission limitation.The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

The quarterly summaries shall be submitted, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the spray booth dry filtration system(s) was (were) not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall notify the Director (the appropriate District Office or local air agency) of any monthly record showing an exceedance of the rolling, 12-month HAP emission limitations specified in section A.I.2.b. A copy of such record shall be sent to the Director (the appropriate District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall also submit annual reports that specify the total VOC and particulate emissions from this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

#### **V. Testing Requirements**

**1.a** Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1), if required.

**1.b** Emission Limitation:

VOC emissions shall not exceed 10.85 lbs/hr.

Applicable Compliance Method:

Compliance may be based upon the records required pursuant to section A.III.2.

Compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in section A.V.1.d.

**1.c** Emission Limitation:

VOC emissions shall not exceed 45.34 tons/yr

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to section A.III.3.

## V. Testing Requirements (continued)

### 1.d Emission Limitations:

The permittee shall maintain an overall VOC control efficiency which is at least 90%, by weight, and a regenerative thermal oxidizer (RTO) control efficiency (i.e., destruction efficiency) which is at least 90%, by weight, for this emissions unit.

Applicable Compliance Method:

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

- i. The emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and the overall (capture and control efficiencies) control efficiency limitation for VOC.
- iii. The test(s) shall be conducted while emissions units K001, R001, R002, R003, R004, and R011 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- iv. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for VOC: 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A, as appropriate.
- v. The test methods which must be employed to demonstrate compliance with the overall (capture and control efficiencies) control efficiency limitation for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

## V. Testing Requirements (continued)

### 1.e Emission Limitations:

The total facility HAP emissions shall be less than 10 tons per rolling, 12-month period for any individual HAP and less than 25 tons per rolling, 12-month period for all HAPs combined.

Applicable Compliance Method:

Compliance shall be based upon the records required pursuant to sections A.III.3 and A.III.4.

### 1.f Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation may be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} * (1-TE) * (1-CE)$$

$$E = \text{particulate emission rate (lb/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = control efficiency of the control equipment (i.e., booth filters)

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

### 1.g Emission Limitation:

Particulate emissions shall not exceed 2.41 tons/yr.

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly particulate emission limitation by 8760 and dividing by 2000 lbs/ton. Compliance with this emission limitation will be demonstrated provided that the permittee complies with the hourly particulate emission limitation.

## 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings, thinners, and cleanup materials.

Formulation data shall be used to determine the individual HAP content of each HAP-containing material employed at the facility.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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