

*West Virginia Department of Environmental Protection
Division of Air Quality*

Joe Manchin, III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate



*Pursuant to
Title V
of the Clean Air Act*

Issued to:
**American Woodmark Corporation
South Branch Plant
R30-03100030-2006**

*John A. Benedict
Director*

*Issued: November 14, 2006 • Effective: November 28, 2006
Expiration: November 14, 2011 • Renewal Application Due: May 14, 2011*

Permit Number: **R30-03100030-2006**
Permittee: **American Woodmark Corporation**
Facility Name: **South Branch Plant**
Mailing Address: **587 Robert C. Byrd Industrial Park, Moorefield, WV 26836**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Moorefield, Hardy County, West Virginia
Mailing Address: 587 Robert C. Byrd Industrial Park Road, Moorefield, WV 26836
Telephone Number: 304-530-1100
Type of Business Entity: Corporation
Facility Description:
The main processes of the plant is the manufacture and finishing of wood doors and frames for shipment to American Woodmark Corporation facilities across the nation for final assembly into finished kitchen and vanity cabinets. Primary processes will include dimensioning of kiln-dried wood; assembly of parts to create either doors of frames; and finishing of doors, frames and miscellaneous parts.
SIC Codes: 2434
UTM Coordinates: 677.73 km Easting • 4,327.129 km Northing • Zone 17

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0.	Emission Units and Active R13, R14, and R19 Permits	4
1.1.	Emission Units	4
1.2.	Active R13, R14, and R19 Permits	8
2.0.	General Conditions	9
2.1.	Definitions	9
2.2.	Acronyms	9
2.3.	Permit Expiration and Renewal	10
2.4.	Permit Actions	10
2.5.	Reopening for Cause	10
2.6.	Administrative Permit Amendments	11
2.7.	Minor Permit Modifications	11
2.8.	Significant Permit Modification	11
2.9.	Emissions Trading	11
2.10.	Off-Permit Changes	11
2.11.	Operational Flexibility	12
2.12.	Reasonably Anticipated Operating Scenarios	13
2.13.	Duty to Comply	13
2.14.	Inspection and Entry	13
2.15.	Schedule of Compliance	14
2.16.	Need to Halt or Reduce Activity not a Defense	14
2.17.	Emergency	14
2.18.	Federally-Enforceable Requirements	15
2.19.	Duty to Provide Information	15
2.20.	Duty to Supplement and Correct Information	15
2.21.	Permit Shield	15
2.22.	Credible Evidence	16
2.23.	Severability	16
2.24.	Property Rights	16
2.25.	Acid Deposition Control	16
3.0.	Facility-Wide Requirements	18
3.1.	Limitations and Standards	18
3.2.	Monitoring Requirements	22
3.3.	Testing Requirements	22
3.4.	Recordkeeping Requirements	23
3.5.	Reporting Requirements	26
3.6.	Compliance Plan	28
3.7.	Permit Shield	29
4.0.	Source-Specific Requirements [Rotary Sanding Machines, Panel Cleaning Machines, Manual Sanding Conveyors, Wide Belt Sanding Machines, Denibbing Machines, and Mill Area Equipment]	32
4.1.	Limitations and Standards	32
4.2.	Monitoring Requirements	33
4.3.	Testing Requirements	33
4.4.	Recordkeeping Requirements	33
4.5.	Reporting Requirements	33

4.6.	Compliance Plan	33
5.0.	Source-Specific Requirements [Boilers]	34
5.1.	Limitations and Standards	34
5.2.	Monitoring Requirements	37
5.3.	Testing Requirements	38
5.4.	Recordkeeping Requirements	38
5.5.	Reporting Requirements	38
5.6.	Compliance Plan	39
6.0.	Source-Specific Requirements [Recuperative Thermal Oxidizers]	40
6.1.	Limitations and Standards	40
6.2.	Monitoring Requirements	41
6.3.	Testing Requirements	41
6.4.	Recordkeeping Requirements	42
6.5.	Reporting Requirements	42
6.6.	Compliance Plan	42
7.0.	Source-Specific Requirements [Storage Tanks]	43
7.1.	Limitations and Standards	43
7.2.	Monitoring Requirements	43
7.3.	Testing Requirements	43
7.4.	Recordkeeping Requirements	44
7.5.	Reporting Requirements	44
7.6.	Compliance Plan	44
8.0.	Source-Specific Requirements [Paint Spray Booth]	45
8.1.	Limitations and Standards	45
8.2.	Monitoring Requirements	45
8.3.	Testing Requirements	45
8.4.	Recordkeeping Requirements	45
8.5.	Reporting Requirements	45
8.6.	Compliance Plan	45
9.0.	Source-Specific Requirements [U.V. Roll Coaters and Ovens]	46
9.1.	Limitations and Standards	46
9.2.	Monitoring Requirements	46
9.3.	Testing Requirements	46
9.4.	Recordkeeping Requirements	47
9.5.	Reporting Requirements	47
9.6.	Compliance Plan	47
10.0.	Source-Specific Requirements [Wood Fuel Silo, Sawdust Hopper]	48
10.1.	Limitations and Standards	48
10.2.	Monitoring Requirements	48
10.3.	Testing Requirements	49
10.4.	Recordkeeping Requirements	49
10.5.	Reporting Requirements	49
10.6.	Compliance Plan	49

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Dust-A1.1	E7/E8	Rotary Sanding Machine	2004		BH5/BH6
Dust-A1.2	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A1.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A1.2	E9/E10	Stain Wiping Machine	2004		RTO1/RTO2
VOC-A1.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A1.4	E9/E10	Oven	2004		RTO1/RTO2
VOC-A1.5	E9/E10	Oven	2004		RTO1/RTO2
Dust-A2.1	E7/E8	Rotary Sanding Machine	2004		BH5/BH6
Dust-A2.2	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A2.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A2.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A2.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A2.4	E9/E10	Oven	2004		RTO1/RTO2
Dust-A3.1	E7/E8	Rotary Sanding Machine	2004		BH5/BH6
Dust-A3.2	E7/E8	Manual Sanding Conveyor	2004		BH5/BH6
Dust-A3.3	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A3.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A3.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A3.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A3.4	E9/E10	Oven	2004		RTO1/RTO2
VOC-A3.5	E9/E10	Oven	2004		RTO1/RTO2
VOC-A3.6	E9/E10	Oven	2004		RTO1/RTO2
Dust-A4.1	E7/E8	Manual Sanding Conveyor	2004		BH5/BH6
Dust-A4.2	E7/E8	Manual Sanding Conveyor	2004		BH5/BH6

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Dust-A4.3	E7/E8	Manual Sanding Conveyor	2004		BH5/BH6
Dust-A4.4	E7/E8	Rotary Sanding Conveyor	2004		BH5/BH6
Dust-A4.5	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A4.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A4.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A5.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A5.2	E9/E10	Stain Wiping Machine	2004		RTO1/RTO2
VOC-A5.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A5.4	E9/E10	Oven	2004		RTO1/RTO2
VOC-A5.5	E9/E10	Oven	2004		RTO1/RTO2
Dust-A5.1	E7/E8	Rotary Sanding Conveyor	2004		BH5/BH6
Dust-A5.2	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A6.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A6.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A6.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A6.4	E9/E10	Oven	2004		RTO1/RTO2
Dust-A6.1	E7/E8	Rotary Sanding Conveyor	2004		BH5/BH6
Dust-A6.2	E7/E8	Panel Cleaning Machine	2004		BH5/BH6
VOC-A7.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A7.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A7.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A7.4	E9/E10	Oven	2004		RTO1/RTO2
VOC-A7.5	E9/E10	Oven	2004		RTO1/RTO2
Dust-A7.1	E7/E8	Rotary Sanding Machine	2004		BH5/BH6
Dust-A7.2	E7/E8	Manual Sanding Conveyor	2004		BH5/BH6
Dust-A7.3	E7/E8	Panel Cleaning Machine	2004		BH5/BH6

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
VOC-A8.1	E9/E10	Preheater included with Automatic Spray Machine w/ Belt Cleaning System	2004		RTO1/RTO2
VOC-A8.2	E9/E10	Oven	2004		RTO1/RTO2
VOC-A8.3	E9/E10	Oven	2004		RTO1/RTO2
VOC-A8.4	E9/E10	Oven	2004		RTO1/RTO2
VOC-A8.5	E9/E10	Oven	2004		RTO1/RTO2
VOC-A8.6	E9/E10	Oven	2004		RTO1/RTO2
VOC-A8.7	E9/E10	Oven Cooling	2004		RTO1/RTO2
VOC-A8.8	E9/E10	Oven Cooling	2004		RTO1/RTO2
VOC-A8.9	E9/E10	Oven Cooling	2004		RTO1/RTO2
VOC-B1.1	E9/E10	Automatic Robotic Spray Machine	2004		RTO1/RTO2
VOC-B1.2	E9/E10	Hot Air Flash Tunnel with Recycle	2004		RTO1/RTO2
VOC-B1.3	E9/E10	Hot Air Flash Tunnel with Recycle	2004		RTO1/RTO2
VOC-B2.1	E9/E10	Automatic Robotic Spray Machine	2004		RTO1/RTO2
VOC-B2.2	E9/E10	Hot Air Flash Tunnel with Recycle	2004		RTO1/RTO2
VOC-B2.3	E9/E10	Hot Air Flash Tunnel with Recycle	2004		RTO1/RTO2
VOC-B3.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B3.2	E-B8	UV Oven UV 2000	2004	9,252 CFM	NA
VOC-B3.3	NA	N.2 Roll Coater Machine	2004		NA
VOC-B3.4	E-B8	UV Oven UV 2000	2004	9,252 CFM	NA
Dust-B1.1	E7/E8	Wide Belt Sanding Machine	2004		BH5/BH6
Dust-B1.2	E7/E8	Denibbing Machine	2004		BH5/BH6
VOC-B4.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B4.2	NA	N.2 Roll Coater Machine	2004		NA
VOC-B4.3	E9/E10	Jet Nozzles Oven with Infrared Lamps	2004		RTO1/RTO2
VOC-B5.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B5.2	NA	N.2 Roll Coater Machine	2004		NA
VOC-B5.3	E9/E10	Stain Wiping Machine	2004		RTO1/RTO2
VOC-B5.4	E9/E10	Hot Air Laminar Oven with Recycle	2004		RTO1/RTO2
VOC-B5.5	E9/E10	Jet Nozzles Oven with Infrared Lamps	2004		RTO1/RTO2

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Dust-B2.1	E7/E8	Denibbing Machine	2004		BH5/BH6
VOC-B6.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B6.2	E-B9	UV Oven UV 2000	2004	20,734 CFM	NA
VOC-B7.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B7.2	E-B9	UV Oven UV 2000	2004	20,734 CFM	NA
Dust-B3.1	E7/E8	Denibbing Machine	2004		BH5/BH6
VOC-B8.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B8.2	E-B9	UV Oven UV 2000	2004	20,734 CFM	NA
Dust-B4.1	E7/E8	Denibbing Machine	2004		BH5/BH6
VOC-B9.1	NA	N.2 Roll Coater Machine	2004		NA
VOC-B9.2	E-B9	UV Oven UV 2000	2004	20,734 CFM	NA
PR	E11	Bulk Storage Tanks - Pump Room	2004/2007	Varies. (Per Tank Max = 19,812 gal)	NA
TB1	E9/E10, E12	Paint Spray Booth	2008	8,000 CFM 1Gal/Day	RTO1/RTO2
SD13 (<i>S13 in R13-2571</i>)	E13	Sawdust Hopper	2007	5,000 lb/hr	PE
S1	E23	Wood Dust Silo #1	2004	46,000 ft ³	BV1
B1	E4	600 HP wood-fired boiler	2004	28.8 MMBtu/hr	C1
B2	E5	500 HP natural gas-fired boiler	2004	20.9 MMBtu/hr	NA
B4	E-B4	Natural gas-fired auxiliary boiler		1.22 MMBtu/hr	NA
FP1	E14	Diesel-powered fire water pump	2004	300 HP	NA
Mill Area	E1, E2, E3, E6	Mill Area Equipment	2004	NA	BH1, BH2, BH3, BH4
<u>SB02</u>	<u>E9,E10, E15</u>	<u>Paint Spray Booth</u>	<u>2008</u>		<u>RTO 1&2</u>
<u>SB03</u>	<u>E9,E10, E16</u>	<u>Paint Spray Booth</u>	<u>2008</u>		<u>RTO 1&2</u>

Control Devices

Control Device ID	Emission Point ID	Description	Year Installed	Capacity	Control Device
RTO1	E9	Recuperative Thermal Oxidizer (RTO)	2004	45,000 CFM	NA
RTO2	E10	Recuperative Thermal Oxidizer (RTO)	2004	45,000 CFM	NA
BV1	E23	Silo Bin Vent	2004		NA
C1	E4	Hurst Boiler and Welding Multiclone	2004		NA
BH1	E1	Baghouse 1	2004	53,000 CFM	NA
BH2	E2	Baghouse 2	2004	53,000 CFM	NA
BH3	E3	Baghouse 3	2004	53,000 CFM	NA
BH4	E6	Baghouse 4	2004	53,000 CFM	NA
BH5	E7	Baghouse 5	2004	53,000 CFM	NA
BH6	E8	Baghouse 6	2004	53,000 CFM	NA

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2571H <u>J</u>	December 7 <u>8</u> , 2007 <u>8</u>

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NSPS	New Source Performance Standards
CBI	Confidential Business Information	PM	Particulate Matter
CEM	Continuous Emission Monitor	PM₁₀	Particulate Matter less than 10µm in diameter
CES	Certified Emission Statement	pph	Pounds per Hour
C.F.R. or CFR	Code of Federal Regulations	ppm	Parts per Million
CO	Carbon Monoxide	PSD	Prevention of Significant Deterioration
C.S.R. or CSR	Codes of State Rules	psi	Pounds per Square Inch
DAQ	Division of Air Quality	SIC	Standard Industrial Classification
DEP	Department of Environmental Protection	SIP	State Implementation Plan
FOIA	Freedom of Information Act	SO₂	Sulfur Dioxide
HAP	Hazardous Air Pollutant	TAP	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	TPY	Tons per Year
HP	Horsepower	TRS	Total Reduced Sulfur
lbs/hr	Pounds per Hour	TSP	Total Suspended Particulate
LDAR	Leak Detection and Repair	USEPA	United States Environmental Protection Agency
M	Thousand	UTM	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	VEE	Visual Emissions Evaluation
MM	Million	VOC	Volatile Organic Compounds
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3..
[45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3., 45CSR13, R13-2571, 4.1.47. and 4.1.48.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
 - a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) 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 45CSR§§30-6.6.a.1.A. or B.
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
 - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.
[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
 - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the permit shield.
 - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
 - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
 - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
 - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution Control equipment), practices, or operations regulated or required under the permit;
 - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a 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 conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[45CSR§30-5.7.a.]

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

2.21. Permit Shield

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically

identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.
[40 C.F.R. 61 and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.
[40 C.F.R. 82, Subpart F]
- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]
- 3.1.9. Maximum amount of wood dust transferred to Silo #1 [S1] shall not exceed 18,860 tons per year.
[45CSR13, R13-2571, 4.1.14.]
- 3.1.10. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2., and 45CSR13, R13-2571, 4.1.38.]
- 3.1.11. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9.1., and 45CSR13, R13-2571, 4.1.41.]
- 3.1.12. The aggregate facility emission rate to the atmosphere of Volatile Organic Compounds (VOC) from all sources identified in Permit Application R13-2571, and any subsequent revision thereto, shall not exceed 249 tons per year. Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.
[45CSR13, R13-2571, 4.1.26.]
- 3.1.13. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR13, R13-2571, 4.1.60.]
- 3.1.14. **Emissions from Finishing Operations.** The permittee shall limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of 40 C.F.R. 63 Subpart JJ using any of the compliance methods in §63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the permittee shall use the methods presented in §63.803(l)(2) for determining styrene and formaldehyde usage.
[40 C.F.R. § 63.802(b)(1), and 45CSR34]

- 3.1.15. **Emissions from Contact Adhesives.** The permittee shall limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in §63.804(e).
[40 C.F.R. § 63.802(b)(2), and 45CSR34]
- 3.1.16. **Emissions from Strippable Spray Booth Coatings.** The permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.
[40 C.F.R. § 63.802(b)(3), and 45CSR34]
- 3.1.17. **Work Practice Implementation Plan.** The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of §63.803. The written work practice implementation plan shall be available for inspection by the Administrator upon request. If the Administrator determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of §63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the permittee's Title V permit.
[40 C.F.R. § 63.803(a), and 45CSR34]
- 3.1.18. **Operator Training Course.** The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of 40 C.F.R. 63 Subpart JJ. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
- (1) A list of all current personnel by name and job description that are required to be trained;
 - (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- [40 C.F.R. § 63.803(b), and 45CSR34]**

- 3.1.19. **Inspection and Maintenance Plan.** The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic solvents;
 - (2) An inspection schedule;
 - (3) Methods for documenting the date and results of each inspection and any repairs that were made;
 - (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

[40 C.F.R. § 63.803(c), and 45CSR34]

- 3.1.20. **Chemical Composition of Cleaning and Washoff Solvents.** The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to 40 C.F.R. 63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.

[40 C.F.R. § 63.803(e), and 45CSR34]

- 3.1.21. **Storage Requirements.** The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

[40 C.F.R. § 63.803(g), and 45CSR34]

- 3.1.22. **Application Equipment Requirements.** The permittee shall use conventional air spray guns to apply finishing materials only under any of the circumstances listed under 40 C.F.R. §§ 63.803(h)(1), (2), (3), (4), (5) or (6).

[40 C.F.R. § 63.803(h), and 45CSR34]

- 3.1.23. **Line Cleaning, Gun Cleaning and Washoff Operations.** The permittee shall pump or drain all organic solvent used for line cleaning into a normally closed container. The permittee shall collect all organic solvent used to clean spray guns into a normally closed container. The permittee shall control emissions from washoff operations by,

- (1) Using normally closed tanks for washoff; and
- (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

[40 C.F.R. §§ 63.803(i), (j), and (k), and 45CSR34]

- 3.1.24. **Formulation Assessment Plan.** The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan in accordance with §63.803(l).
[40 C.F.R. § 63.803(l), and 45CSR34]

3.2. Monitoring Requirements

- 3.2.1. The permittee shall monitor and maintain records of monthly wood dust transferred to Silo #1 [S1] for demonstrating compliance with 3.1.9. of this permit.
[45CSR13, R13-2571, 4.2.1.a.]
- 3.2.2. The facility will use a combination of compliance methods as defined in 40 CFR § 63.804(d)(4) by utilizing a combination of a VHAP averaging, compliant materials, and the use of a control system. The unit will maintain compliance with the provisions of 40 C.F.R. 63 Subpart JJ for training, recordkeeping, monitoring and reporting.
[40 C.F.R. § 63.804(d)(4), 45CSR34, and 45CSR13, R13-2571, 4.1.57.]
- 3.2.3. **Cleaning and Washoff Solvent Accounting System.** Each owner or operator of an affected source shall develop an organic solvent accounting form to record:
- (1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in §63.801;
 - (2) The number of pieces washed off, and the reason for the washoff; and
 - (3) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

[40 C.F.R. § 63.803(d), and 45CSR34]

- 3.2.4. The permittee shall perform weekly visual inspection of dry filters (for robotic spray machines applying stains) and wet filtration systems (for robotic spray machines applying sealers and topcoats) to assure proper operation of filtration systems.
[45CSR13, R13-2571, 4.2.2.f.]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

[WV Code § 22-5-4(a)(15), 45CSR§§7-8.1 and 8.2, 45CSR13, R13-2571, 4.1.39., and 4.1.40.]

- 3.3.2. The permitted facility shall comply with 40 C.F.R. § 63.805, Performance Test Methods of 40 C.F.R. 63 Subpart JJ, "*National Emission Standards for Wood Furniture Manufacturing Operations*", provided that the permittee shall comply with any more stringent requirements as may be set forth under this permit.
[45CSR13, R13-2571, 4.3.1., and 45CSR34]

3.4. Recordkeeping Requirements

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A. and 45CSR13, R13-2571, 4.4.1.]

- 3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]
- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]
- 3.4.4. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, R13-2571, 4.4.2.]
- 3.4.5. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- e. The cause of the malfunction.
 - f. Steps taken to correct the malfunction.
 - g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- [45CSR13, R13-2571, 4.4.3.]**
- 3.4.6. To determine compliance with 4.1.2., 4.1.3., 5.1.7., 5.1.17., 6.1.3., 6.1.4., 10.1.1., and 10.1.5. of this permit, any and all malfunctions of the control devices shall be documented in writing, and maintained on-site. The following information must be documented for each malfunction:
- a. The equipment involved in the malfunction and the associated cause.
 - b. Steps taken to correct the malfunction.
 - c. The steps taken to minimize the emissions during the malfunction.
 - d. The duration of the malfunction.
 - e. The increase in emissions during the malfunction.
 - f. Steps taken to prevent a similar malfunction in the future.

These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.
[45CSR13, R13-2571D, 4.4.4.]

- 3.4.7. The permittee shall fulfill all recordkeeping requirements of 40 C.F.R. § 63.10 of subpart A, according to the applicability criteria in §63.800(d).
[40 C.F.R. § 63.806(a), and 45CSR34]
- 3.4.8. The permittee shall maintain records of,
- (1) certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in §63.802; and
 - (2) the VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in §63.802; and
 - (3) the VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied of each strippable booth coating subject to the emission limits in §63.802 (b)(3).
- [40 C.F.R. § 63.806(b), and 45CSR34]**
- 3.4.9. The permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1, which is given in 40 C.F.R. § 63.804(a)(1).
[40 C.F.R. § 63.806(c), and 45CSR34]
- 3.4.10. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- (1) Records demonstrating that the operator training program required by §63.803(b) is in place;
 - (2) Records collected in accordance with the inspection and maintenance plan required by §63.803(c);
 - (3) Records associated with the cleaning solvent accounting system required by §63.803(d);
 - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by §63.803(h)(5);
 - (5) Records associated with the formulation assessment plan required by §63.803(l); and
 - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

[40 C.F.R. § 63.806(e), and 45CSR34]

- 3.4.11. To determine compliance with 3.1.12., 6.1.1., 8.1.1., and 9.1.1., ~~and 9.1.2.~~, of this permit, the permittee shall monitor and maintain calendar monthly records of the following:
- a. The monthly hours of operation of the finishing process.
 - b. The name and identification number of each surface coating, as applied each month.
 - c. The monthly quantity applied of each coating or solvent material, as documented in the permittee's coating and solvent usage emission quantification database program.
 - d. The mass of VOC, individual and aggregate HAPs, and solids per volume of each surface coating and solvent material, as applied each month.
 - e. The actual pounds per month of VOC, individual and aggregate HAPs, and PM emitted from the subject emission points. Pollutant capture and control efficiencies used in the compliance calculations (for this permit only) shall be those minimum values as specified under sections 6.1.3. and 6.1.6.
 - f. The VOC, individual and aggregate HAPs, and PM emitted for the month shall be divided by the total number of hours the subject emission sources were operated for the given month. The resulting monthly average shall be tabulated as pounds per hour in order to demonstrate compliance with the hourly limits established for the subject emission points.
 - g. The permittee shall monitor and record the monthly quantity of natural gas fuel consumed by the Regenerative Thermal Oxidizers RTO1 and RTO2.

These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request. [45CSR13, R13-2571, 4.2.3.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. [45CSR§30-4.4. and 5.1.c.3.D.]
- 3.5.2. **Confidential Information.** A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31. [45CSR§30-5.1.c.3.E.]
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class, or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]
- 3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.
- 3.5.8. **Deviations.**
- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
 1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such

deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- 3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

- 3.5.10. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 40CFR60, Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

[45CSR13, R13-2571, 4.5.2.]

- 3.5.11. **Continuous Compliance Demonstrations.** The permittee shall demonstrate continuous compliance by submitting results of the averaging calculation (Equation 1, set forth in 40 C.F.R. § 63.804(a)(1)) for each month within that semiannual period. The permittee shall demonstrate compliance by using compliant coatings and thinners, maintaining records and demonstrate that the coatings and thinners are compliant. The permittee shall demonstrate compliance for coatings used on continuous coaters by following the procedures in paragraph §63.804(g)(3)(i) or (ii). For the control devices, the permittee shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to the manufacturer's specifications. All results, records, and supporting documentation shall be submitted as part of the compliance certification with the semiannual report required by §63.807(c).

[40 C.F.R. §§ 63.804(g)(1), (2), (3), (4), and 45CSR34]

3.6. Compliance Plan

- 3.6.1. None.

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- a. **45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers** - The boiler B1 has a design heat input capacity less than 100 MMBtu/hr. Based upon 45CSR§2-8.4.c the boiler B1 is only exempt from the *testing* specified in 45CSR§2-8.1.a and the *monitoring* specified in 45CSR§2-8.2. The Director reserves the right to require testing pursuant to divisions 8.1.b and 8.1.c.

The boiler B2 is natural gas-fired. In accordance with 45CSR§2-8.4.b, the boiler B2 is only exempt from the *testing* specified in 45CSR§2-8.1.a and the *monitoring* specified in 45CSR§2-8.2.

The boiler B4 is a direct-fired unit, and has a design heat input capacity is less than 10 MMBtu/hr. Based upon 45CSR§2-11.1. the boiler is exempt from the requirements of Section 4 - Weight emission standards; Section 5 - Control of fugitive particulate matter; Section 6 - Registration; Section 8 - Testing, Monitoring, Recordkeeping, and Reporting; and Section 9 - Startups, Shutdowns, and Malfunctions. Furthermore, 45CSR2 is applicable to *indirect* heat exchangers, and the boiler B4 is *direct*-fired. Therefore, 45CSR2 does not apply to boiler B4.

- b. **45CSR21 - Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. American Woodmark's South Branch facility is located in Hardy County; therefore, it is not subject to 45CSR21.
- c. **45CSR27 - To Prevent and Control the Emissions of Toxic Air Pollutants.** Potential formaldehyde emissions (0.20 tpy or 400 lbs/yr) from this facility are below the applicability threshold of 1,000 pounds per year and are, therefore, exempt from 45CSR27.
- d. **45CSR29 - Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.** 45CSR29 applies to stationary sources in Putnam, Kanawha, Cabell, Wayne, Wood, and Greenbrier Counties. American Woodmark's South Branch facility is located in Hardy County; therefore, it is not subject to 45CSR29.
- e. **40CFR60 Subparts K, Ka, Kb - Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978; after May 18, 1978, and prior to July 23, 1984; after July 23, 1984, respectively.**

The permittee utilizes thirty-five (35) tanks at the facility. Regardless of the construction date, these New Source Performance Standards (NSPS) are applicable to tanks with capacities of at least 20,000 US gallon or 40,000 US gallon. The permittee's tanks T1 through T35 do not satisfy this requirement since the largest capacity tanks at the facility are 5,500 US gallon each. Therefore the tanks T1 through T35 are not subject

to 40CFR60 Subparts K, Ka, Kb.

f. **40CFR60 Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units***

The permittee currently operates two (2) boilers at the facility, and is planning to install an auxiliary boiler in year 2006. The wood-fired Boiler B1 has a design capacity of 28.8 MMBtu/hr. The natural gas-fired boiler B2 has a design capacity of 20.9 MMBtu/hr. The planned natural gas-fired auxiliary boiler B4 will have a design capacity of 1.22 MMBtu/hr. The boilers listed above were (or will be) constructed after June 19, 1984, which satisfies part of the applicability criteria. However, the boilers listed above have design heat input capacity less than 100 MMBtu/hr. 40CFR60 Subpart Db requires that both the construction date and the design heat input capacity criteria be met in order to be applicable to a source. Therefore the boilers listed are not subject to 40CFR60 Subpart Db.

g. **40CFR60 Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units***

The permittee currently operates two (2) boilers at the facility, and is planning to install an auxiliary boiler in year 2006. The wood-fired boiler B1 has a design capacity of 28.8 MMBtu/hr. The natural gas-fired boiler B2 has a design capacity of 20.9 MMBtu/hr. The planned natural gas-fired auxiliary boiler B4 will have a design capacity of 1.22 MMBtu/hr.

The boiler B1 is subject to the recordkeeping and reporting requirements in 40CFR60 Subpart Dc since it meets the applicability requirements of 40CFR§60.40c(a), which includes boilers constructed after June 9, 1989 and having a design heat input capacity between 10 MMBtu/hr and 100 MMBtu/hr. However, the boiler B1 is not subject to the PM weight emission standards specified under 40CFR§60.43c(b) because the boiler combusts only wood at a design heat input capacity less than 30 MMBtu/hr. Similarly, the boiler B1 is not subject to specific opacity requirements specified under 40CFR§60.43c(c) because the boiler combusts only wood at a design heat input capacity less than 30 MMBtu/hr. Since the boiler is not subject to 40CFR§60.43c(c), the boiler B1 is not required to operate a Continuous Opacity Monitoring System (COMS) with the boiler as per 40CFR§60.47c(a). Furthermore, the boiler B1 is not subject to specific SO₂ emission standards, as per 40CFR§60.42c(j), because the boiler combusts only wood at a design heat input capacity less than 30 MMBtu/hr.

The boiler B2 is subject to 40CFR60 Subpart Dc since it meets the applicability requirements of 40CFR§60.40c(a), which includes boilers constructed after June 9, 1989 and having a design heat input capacity between 10 MMBtu/hr and 100 MMBtu/hr. The majority of the provisions in 40CFR60 Subpart Dc regulate the burning of coal, wood or oil either individually or in combination. None of the requirements of 40CFR§60.41c through 40CFR§60.47c apply to boiler B2 as they all refer to combustion of coal, wood or oil, or some combination thereof.

The boiler B4 is not subject to 40CFR60 Subpart Dc because its design heat input capacity is less than 10 MMBtu/hr, even though it will be constructed after June 9, 1989.

h. **40CFR63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters**

The natural gas-fired boiler B2 is a *firetube* boiler of design heat input capacity of 20.9 MMBtu/hr. For purposes of the MACT, all firetube units are considered small, regardless of design heat input. The boiler B2 is not subject to this MACT since in §63.7506(c)(4) *small gaseous fuel units* are excluded from being subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in subpart A of this part.

The natural gas-fired boiler B4 is a *small gaseous fuel unit* boiler because its design heat input capacity is less than 10 MMBtu/hr (§63.7575) and combusts only natural gas. The boiler B4 is not subject to this MACT since in §63.7506(c)(4) *small gaseous fuel units* are excluded from being subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in subpart A of this part.

i. **45CSR13, R13-2571, 4.1.43.**

The construction permit condition 45CSR13, R13-2571, 4.1.43. is only applicable when the emissions from at least two emission units vent through the same stack (i.e., emission point). None of the boilers, or recuperative thermal oxidizers are installed and operated in this fashion. Therefore, this particular construction permit condition will not be included in the Title V permit.

j. **45CSR13, R13-2571, 4.1.45.**

The construction permit condition 45CSR13, R13-2571, 4.1.45. is based upon 45CSR§10-8.2.a. In the Exemptions and Recommendations set forth in 45CSR§10-10.3., all fuel burning units which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the testing, monitoring, recordkeeping, and reporting requirements set forth in 45CSR§10-8. Since boiler B1 combusts wood and B2 combusts natural gas, they are exempt from 45CSR§10-8 and the construction permit condition 45CSR13, R13-2571, 4.1.45., is not applicable and will not be included in the Title V permit. The boiler B4 has a design heat input less than 10 MMBtu/hr, and in accordance with 45CSR§10-10.1., is exempt from sections 3, and sections 6 through 8 of 45CSR10.

k. **45CSR13, R13-2571, 4.1.46.**

This construction permit condition states, "At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance."

This construction permit condition is not an applicable requirement for Title V permitting. Therefore, this condition will not be included in the permittee's Title V permit. Any testing required will be permitted in accordance with 3.3. of the permit, and other specific test requirements that may be set forth in each section of the permit.

4.0. Source-Specific Requirements [Rotary Sanding Machines, Panel Cleaning Machines, Manual Sanding Conveyors, Wide Belt Sanding Machines, Denibbing Machines and Mill Area Equipment: Emission Point ID's E1, E2, E3, E6, E7, E8]

4.1. Limitations and Standards

- 4.1.1. Maximum particulate matter emissions to the atmosphere from Emission Point ID# E1, E2, E3, E6, E7 and E8 shall not exceed the following limits:

Emission Point ID#	Source	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
E1	Baghouse 1 (BH1)	0.59	2.60
E2	Baghouse 2 (BH2)	0.59	2.60
E3	Baghouse 3 (BH3)	1.19	5.21
E6	Baghouse 4 (BH4)	1.19	5.21
E7	Baghouse 5 (BH5)	0.37	1.62
E8	Baghouse 6 (BH6)	0.37	1.62

Compliance with the maximum hourly emission rates set forth in the table above ensures compliance with the less stringent limitation set forth by 45CSR§7-4.1.

[45CSR13, R13-2571, 4.1.11., and 45CSR§7-4.1.]

- 4.1.2. Emissions from E1, E2, E3, E6, E7, and E8 shall be vented to and controlled by baghouses BH1, BH2, BH3, BH4, BH5, and BH6, prior to release to the atmosphere. These control devices shall be designed to achieve a minimum guaranteed control efficiency of 99.9% for particulate matter emissions.

[45CSR13, R13-2571, 4.1.12.]

- 4.1.3. The stabilized static pressure loss across baghouses BH1, BH2, BH3, BH4, BH5, and BH6 shall remain between 0.5 to 4.0 inches of water.

[45CSR13, R13-2571, 4.1.13.]

- 4.1.4. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 45CSR§§7-3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

[45CSR13, R13-2571, 4.1.34., and 45CSR§7-3.1.]

- 4.1.5. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.

[45CSR§7-4.12.]

4.2. Monitoring Requirements

- 4.2.1. The permittee shall daily monitor and record the stabilized static pressure loss across each of the baghouses BH1, BH2, BH3, BH4, BH5, and BH6.

[45CSR13, R13-2571, 4.2.2.c.]

- 4.2.2. For the purpose of determining compliance with the opacity limit set forth in 4.1.4. in this permit, the permittee shall conduct monthly visible emission checks and/or opacity monitoring and recordkeeping. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR60, Appendix A, Method 22 or from the lecture portion of the 40CFR60, Appendix A, Method 9 certification course.

The permittee shall conduct visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for emission points E1, E2, E3, E6, E7, E8. The observations shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive test dates. These observations shall be conducted during periods of normal facility operation and appropriate weather conditions for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 45CSR7A, within twenty-four (24) hours. An evaluation based upon 45CSR7A shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.

[45CSR§7A-2.1.a. and 45CSR§30-5.1.c.]

4.3. Testing Requirements

- 4.3.1. The permittee shall develop and implement a program to annually verify and calibrate the differential pressure sensing devices.

[45CSR§30-12.7.]

4.4. Recordkeeping Requirements

- 4.4.1. Reserved.

4.5. Reporting Requirements

- 4.5.1. Reserved.

4.6. Compliance Plan

- 4.6.1. None.

5.0. Source-Specific Requirements [Boilers: Emission Point ID's E4, E5, E-B4]

5.1. Limitations and Standards

- 5.1.1. Maximum emissions to the atmosphere from Emission Point ID# E4 (Wood Boiler B1) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	13.83	60.57
Carbon Monoxide	8.47	37.09
Particulate Matter	7.06	30.91
Sulfur Dioxide	0.71	3.09
Volatile Organic Compounds	0.48	2.10

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months. Compliance with the particulate matter hourly emission limit ensures compliance with the less stringent hourly limit set forth by 45CSR§2-4.1. Compliance with the sulfur dioxide hourly emission limit ensures compliance with the less stringent hourly limit in 45CSR§10-3.3.f.

[45CSR13, R13-2571, 4.1.1., 4.1.29, and 4.1.42., 45CSR§2-4.1, 45CSR§10-3.3.f.]

- 5.1.2. Maximum emissions to the atmosphere from Emission Point ID# E5 (Natural Gas Boiler B2) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	2.09	9.16
Carbon Monoxide	1.76	7.69
Particulate Matter	0.16	0.70
Sulfur Dioxide	0.01	0.05
Volatile Organic Compounds	0.11	0.50

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months. Compliance with the particulate matter hourly emission limit ensures compliance with the less stringent hourly limit set forth by 45CSR§2-4.1. Compliance with the sulfur dioxide hourly emission limit ensures compliance with the less stringent hourly limit in 45CSR§10-3.3.f.

[45CSR13, R13-2571, 4.1.2., 4.1.29, and 4.1.42., 45CSR§2-4.1, 45CSR§10-3.3.f.]

- 5.1.3. Maximum emissions to the atmosphere from Emission Point ID# EB-4 (Natural Gas Fired Auxiliary Boiler B4) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	0.12	0.54
Carbon Monoxide	0.10	0.45
Particulate Matter	0.01	0.04
Sulfur Dioxide	0.01	0.01
Volatile Organic Compounds	0.01	0.03

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.3.]

- 5.1.4. The hourly and annual throughput of wood waste to the 28.8 MMBTU/hr Hurst Boiler and Welding Co. Inc. Wood Boiler (B1), shall not exceed 2,866 lb/hr or 12,553 ton/year. Compliance with the wood waste throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the throughput at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.4.]

- 5.1.5. The hourly and annual throughput of natural gas to the 20.9 MMBTU/hr Hurst Boiler (B2), shall not exceed 20,904 cubic feet per hour or 183,115,208 cubic feet per year. Compliance with the natural gas throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the throughput at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.5.]

- 5.1.6. The hourly and annual throughput of natural gas to the 1.22 MMBTU/hr Buderus Boiler (B4), shall not exceed 1,220 cubic feet per hour or 10,690,000 cubic feet per year. Compliance with the natural gas throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the throughput at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.6.]

- 5.1.7. Emissions from Wood Boiler B1 shall be vented to and controlled by a multicyclone (C1), prior to release to the atmosphere. This control device shall be designed to achieve a minimum guaranteed control efficiency of 80% for particulate matter emissions.

[45CSR13, R13-2571, 4.1.9.]

- 5.1.8. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute average.

[45CSR§2-3.1., and 45CSR13, R13-2571, 4.1.28]

- 5.1.9. Except during startup and shutdown, opacity from Boilers B1 and B2 shall not exceed ten (10) percent based on a six minute block average.
[45CSR§2-9.1, and 45CSR13, R13-2571, 4.1.15.]
- 5.1.10. The addition of sulfur oxides to a combustion unit exit gas stream for the purpose of improving emissions control equipment efficiency shall be reviewed by the Director. No person shall cause, suffer, allow or permit the addition of sulfur oxides as described above unless written approval for such addition is provided by the Director.
[45CSR§2-4.4., and 45CSR13, R13-2571, 4.1.30.]
- 5.1.11. At all times, including periods of start-ups, shutdowns, and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
[45CSR§2-9.2., and 45CSR13, R13-2571, 4.1.33.]
- 5.1.12. For boiler B1, the emission rate for the sum of seven selected metals, excluding manganese (Mn), shall not exceed 0.0003 lb per MMBtu of heat input.
[45CSR13, R13-2571, 4.1.52.; 40 C.F.R. § 63.7507(b), and 45CSR34]
- 5.1.13. For boiler B1, the emission rate of manganese (Mn) shall not exceed 0.47 lb per hour.
[45CSR13, R13-2571, 4.1.53.; 40 C.F.R. § 63.7507(b), and 45CSR34]
- 5.1.14. For boiler B1, the emission rate of hydrogen chloride (HCl) shall not exceed 0.02 lb per MMBtu of heat input.
[45CSR13, R13-2571, 4.1.54.; 40 C.F.R. § 63.7500(a)(1), and 45CSR34]
- 5.1.15. For boiler B1, the emission rate of mercury (Hg) shall not exceed 0.000003 lb per MMBtu of heat input.
[45CSR13, R13-2571, 4.1.55.; 40 C.F.R. § 63.7500(a)(1), and 45CSR34]
- 5.1.16. Unless otherwise approved by the Director, the maximum allowable emission rate for an individual stack shall not exceed by more than twenty-five percent (25%) the emission rate determined by prorating the total allowable emission rate based on the basis of individual unit heat input at design capacity for all fuel burning units discharging through that stack.
[45CSR§10-3.4.a., and 45CSR13, R13-2571, 4.1.43.]
- 5.1.17. The stabilized static pressure loss across the multicyclone (C1) shall not exceed pressure drop of 3.4 inches of water.
[45CSR13, R13-2571, 4.1.10.]
- 5.1.18. The facility must develop and implement a written startup, shutdown, and malfunction (SSM) plan for Boiler B1 according to 40 C.F.R. § 63.6(e)(3).
[40 C.F.R. § 63.7505(e), 45CSR§34-4.1., and 45CSR13, R13-2571, 4.1.49.]
- 5.1.19. Boiler B1 must be in compliance with the emission limits (including operating limits) and the work practice standards in 40 C.F.R. 63 Subpart DDDDD at all times, except during periods of startup, shutdown, and malfunction.
[40 C.F.R. § 63.7505(a), 45CSR§34-4.1., and 45CSR13, R13-2571, 4.1.50.]

- 5.1.20. The facility must always operate and maintain Boiler B1, including air pollution control and monitoring equipment according to the provisions in 40 C.F.R. § 63.6(e)(1)(i).
[40 C.F.R. § 63.7505(b), 45CSR§34-4.1., and 45CSR13, R13-2571, 4.1.51.]
- 5.1.21. The facility must operate Boiler B1 in accordance with periods of startup, shutdown, and malfunction, and the facility must operate in accordance with the SSMP as required in 40 C.F.R. § 63.7505(e) (5.1.18. above).
[40 C.F.R. § 63.7540(c), 45CSR §34-4.1., and 45CSR13, R13-2571, 4.1.56.]

5.2. Monitoring Requirements

- 5.2.1. The permittee shall monitor and record the monthly input of wood waste to the boiler B1, and monitor the fuel type, as required by 40 C.F.R. § 63.7555(d)(1).
[40 C.F.R. § 63.7555(d)(1), 45CSR34, 40C.F.R. § 60.48c(g), 45CSR16, and 45CSR13, R13-2571, 4.2.1.b.]
- 5.2.2. The permittee shall monitor and record the monthly input of natural gas to the boiler B2.
[40 C.F.R. § 60.48c(g), 45CSR16, and 45CSR13, R13-2571, 4.2.1.c.]
- 5.2.3. The permittee shall monitor and record the annual hours of operation of boilers B1 and B2.
[45CSR13, R13-2571, 4.2.1.d.]
- 5.2.4. The permittee shall monitor and record once per week, the differential pressure across the multicyclone (Control Device C1) controlling emissions from the wood waste boiler B1.
[45CSR13, R13-2571, 4.2.2.a.]
- 5.2.5. For the purpose of determining compliance with the opacity limit set forth in 5.1.8. and 5.1.9. in this permit, the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR60, Appendix A, Method 22 or from the lecture portion of the 40CFR60, Appendix A, Method 9 certification course.

The permittee shall conduct visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for emission point ID E4 and E5, which are boilers B1 and B2, respectively. The observations shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive test dates. These observations shall be conducted during periods of normal facility operation and appropriate weather conditions for a sufficient time interval, but no less than one (1) minute, to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 40CFR60 Appendix A, Method 9, within twenty-four (24) hours. An evaluation based upon 40CFR60 Appendix A, Method 9, shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.

[45CSR§2-3.1 and 45CSR13, R13-2571, 4.1.15., 4.1.27., 4.2.4.]

- 5.2.6. If visible emissions are present at either boilers B1 or B2 for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that emission point using the procedures and requirements of 40CFR60, Appendix A, Method 9 as soon as practicable, but within seventy-two (72) hours of the final visual emission

check. A 40CFR60, Appendix A, Method 9 observation restarts the count of the number of consecutive readings with the presence of visible emissions.
[45CSR13, R13-2571, 4.2.5.]

5.3. Testing Requirements

- 5.3.1. At such reasonable times as the Director may designate, the owner or operator of any fuel burning unit may be required to conduct or have conducted tests to determine compliance.
[45CSR§2-8.1.b., and 45CSR13, R13-2571, 4.1.31.]
- 5.3.2. For boiler B1, the permittee shall conduct a fuel analysis according to 40 C.F.R. § 63.7521 for each type of fuel burned no later than five (5) years after the previous fuel analysis for each fuel type. If the permittee desires to burn a new type of fuel, the permittee shall conduct a fuel analysis before burning the new type of fuel in the boiler. The permittee shall still meet all applicable continuous compliance requirements in §63.7540.
[45CSR13, R13-2571, 4.3.2., and 40 C.F.R. § 63.7515(f), and 45CSR34]

5.4. Recordkeeping Requirements

- 5.4.1. The owner or operator shall maintain records of the operating schedule and the quantity and quality of fuel consumed in each fuel burning unit in a manner to be established by the Director and set forth in an interpretive rule as authorized by W.Va. Code §29A-1-2. Such records are to be maintained on-site and made available to the Director or his duly authorized representative upon request.
[45CSR§2-8.3.c., and 45CSR13, R13-2571, 4.1.32.]
- 5.4.2. The permittee shall keep records of the type and amount of all fuels burned in boiler B1 during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would either result in lower emissions of total selected metals (TSM), hydrogen chloride (HCl), and mercury (Hg), than the applicable emission limit for each pollutant (if the permittee demonstrates compliance through fuel analysis), or result in lower fuel input of TSM, chlorine, and mercury than the maximum values calculated during the last performance tests (if the permittee demonstrates compliance through performance testing).
[45CSR13, R13-2571, 4.4.5., and 40 C.F.R. § 63.7540(a)(2), and 45CSR34]
- 5.4.3. Records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request. Compliance with the more stringent five-year retention period set forth in permit R13-2571 ensures compliance with the two-year period set forth in 40 C.F.R. §60.48c(i).
[45CSR13, R13-2571, 4.2.1., 40C.F.R. § 60.48c(i), and 45CSR16]
- 5.4.4. Records shall be maintained on site reporting the results of each test under 5.2.6. of this permit. Upon observing any visible emissions in excess of twenty percent (20%) opacity, or excess of forty (40%) for any period or periods aggregating more than five (5) minutes in any sixty (60) minute period, the Company shall submit a written report, certified by a responsible official, to the Director of the Division of Air Quality within five (5) days after taking said reading.
[45CSR13, R13-2571, 4.1.15.]

5.5. Reporting Requirements

- 5.5.1. For the boiler B1, the permittee shall submit continued compliance reports on a semiannual schedule in accordance with §63.7550 (b)(1) through (5). Each report shall contain all information in §63.7550 (c)(1) through (11). For each deviation from an emission limit or operating limit in this subpart and for each deviation from the requirements for work practice standards in this subpart that occurs with boiler B1, the compliance report must contain the information in paragraphs (c)(1) through (10) of §63.7550 and the information required in paragraphs (d)(1) through (4) of §63.7550. This includes periods of startup, shutdown, and malfunction.
[45CSR13, R13-2571, 4.5.3.; 40 C.F.R. § 63.7550, and 45CSR34]
- 5.5.2. For the boiler B1, the permittee shall submit a report of the performance test and fuel analyses within sixty (60) days after the completion of the performance tests or fuel analyses. This report should also verify that the operating limits for your affected source have not changed or provide documentation of revised operating parameters established according to §63.7530 and Table 7 to this subpart, as applicable. The reports for all subsequent performance tests and fuel analyses should include all applicable information required in §63.7550.
[45CSR13, R13-2571, 4.5.4.; 40 C.F.R. § 63.7515(g), and 45CSR34]
- 5.5.3. For the boilers B1 and B2, the permittee shall submit a report of the daily fuel use of the unit. The report shall be submitted every six (6) months to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.
[40 C.F.R. § 60.48c(j), and 45CSR16]
- 5.5.4. The permittee shall submit notification of the date of construction (for Boiler B4 and any other future boiler) or reconstruction (for Boilers B1 and B2), anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:
- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
 - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
 - (4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.
- [40 C.F.R. § 60.48c, 45CSR§16-4.1., and 45CSR13, R13-2571, 4.5.1.]**
- 5.5.5. For Boiler B1, the permittee shall fulfill all reporting requirements of §63.7 through §63.10 of subpart A (General Provisions) according to the applicability criteria in §63.800(d).
[40 C.F.R. § 63.807(a), and 45CSR34]

5.6 Compliance Plan

5.6.1. None.

6.0. Source-Specific Requirements [Recuperative Thermal Oxidizers: Emission Point ID's E9, E10]

6.1. Limitations and Standards

6.1.1. Emissions from the Regenerative Thermal Oxidizers RTO1 (Emission Point ID# E9) and RTO2 (Emission Point ID# E10), shall not exceed the following limits:

Pollutant	Emission Point ID# E9 Maximum Hourly Emissions (lb/hr) *	Emission Point ID# E10 Maximum Hourly Emissions (lb/hr) *	Combined Emission Points ID# E9 and E10 Maximum Hourly Emissions (lb/hr) *	Combined Emission Points ID# E9 and E10 Maximum Annual Emissions (ton/year) **
Carbon Monoxide	1.46	1.46	1.46	6.41
Nitrogen Oxides	1.74	1.74	1.74	7.63
Sulfur Dioxide	0.01	0.01	0.01	0.05
Particulate Matter	1.16	1.16	1.16	3.78
Volatile Organic Compounds	69.37	69.37	69.37	216.56
Total Hazardous Air Pollutants	14.36	14.36	14.36	44.85

* RTO1 (Emission Point ID# E9) and RTO2 (Emission Point ID# E10) can be utilized alone or together, as required by the air pollutant loading to the control devices. The hourly emission limits above allow the permittee to operate either RTO1 or RTO2 alone, or both RTO1 and RTO2 at the same time. When RTO1 and RTO2 are operating at the same time, the hourly air pollutant emission rates from both Emission Point ID# E9 and E10 shall not exceed the Combined Emission Points ID# E9 and E10 Maximum Hourly Emissions limits listed above.

** The combined annual air pollutant emission rates from Emission Point ID# E9 and E10 shall not exceed the Combined Emission Points ID# E9 and E10 Maximum Annual Emissions limits listed above, whether the permittee operates RTO1 or RTO2 alone, or both RTO1 and RTO2 at the same time.

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.16.]

6.1.2. Emissions from the emission sources of Finishing Line VOC - A, and Finishing Line VOC-B (except for UV coating application and curing), shall be vented to and controlled by a Regenerative Thermal Oxidizer, RTO1 (Emission Point ID# E9) or RTO2 (Emission Point ID# E10), prior to release to the atmosphere.

[45CSR13, R13-2571, 4.1.17.]

- 6.1.3. The Regenerative Thermal Oxidizers, RTO1 (Emission Point ID# E9) and RTO2 (Emission Point ID# E10) shall be designed to achieve a minimum guaranteed overall destruction efficiency of 95% for Total Volatile Organic Compound (VOC) emissions.
[45CSR13, R13-2571, 4.1.18.]
- 6.1.4. The Regenerative Thermal Oxidizers RTO1 and RTO2 shall maintain a minimum combustion chamber temperature of 1,550°F on a three (3) hour rolling average during hours of production. The minimum combustion temperature shall be the operating parameter for continued compliance.
[45CSR13, R13-2571, 4.1.19., 40 C.F.R. § 63.804(f)(4)(iv)(A), and 45CSR34]
- 6.1.5. The capture system pressure loss (**the pressure difference between the building and the RTO inlet**), ~~as measured at the inlet of the Regenerative Thermal Oxidizers RTO1 and RTO2~~, shall maintain a minimum pressure drop of 0.004 inches of water **on a three(3) hour rolling average while the plant is in production.**
[45CSR13, R13-2571, 4.1.20.]
- 6.1.6. The emission sources of Finishing Line VOC - A, and Finishing Line VOC-B (except for UV coating application and curing), shall be contained within a capture system that is designed to achieve a minimum guaranteed capture efficiency of 92% for Total Volatile Organic Compound (VOC) emissions.
[45CSR13, R13-2571, 4.1.21.]
- 6.1.7. No person shall cause, suffer, allow, or permit, the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in subdivisions 4.1.a. through 4.1.e. of rule 45CSR10.
[45CSR§10-4.1., and 45CSR13, R13-2571, 4.1.44.]

6.2. Monitoring Requirements

- 6.2.1. The permittee shall monitor and record the three (3) hour rolling average combustion chamber temperature in the Regenerative Thermal Oxidizers RTO1 and RTO2 (during hours of operation). Each RTO shall have a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.
[45CSR13, R13-2571, 4.2.2.d., 40 C.F.R. § 63.804(g)(4)(ii), and 45CSR34]
- 6.2.2. The permittee shall monitor and record the daily average capture system pressure loss, as measured at the inlet of the Regenerative Thermal Oxidizers RTO1 and RTO2.
[45CSR13, R13-2571, 4.2.2.e.]
- 6.2.3. The permittee shall monitor and track the usage of all materials and record such data in REGMET, or an equivalent emissions tracking system.
[45CSR§30-5.1.c.]

6.3. Testing Requirements

- 6.3.1. Reserved.

6.4. Recordkeeping Requirements

- 6.4.1. Records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.
[45CSR13, R13-2571, 4.2.2.]

6.5. Reporting Requirements

- 6.5.1. See 3.2.2. of this permit.

6.6. Compliance Plan

- 6.6.1. None.

7.0. Source-Specific Requirements [Storage Tanks: Emission Point ID E11]

7.1. Limitations and Standards

7.1.1. Emissions from the Pump Room exhaust vent, Emission Point ID# E-11, shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Volatile Organic Compounds	1.48	6.4
Total Hazardous Air Pollutants	1.48	6.4

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.25.]

7.1.2. The aggregated volume of all tanks in the pump room shall not exceed 275,000 gallons, nor shall the total VOC and/or HAP emissions from these tanks exceed 6.15 tons per year. Additionally, the volume of any individual tank shall not exceed 19,812 gallons.

[45CSR13, R13-2571, 4.1.58.]

7.1.3. The storage tanks shall be normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

[40 C.F.R. § 63.803(g) and 45CSR34]

7.2. Monitoring Requirements

7.2.1. The permittee shall monitor all incoming materials and record such data in REGMET, or an equivalent emissions tracking system.

[45CSR§30-5.1.c.]

7.2.2. In order to determine compliance with the emission limits in condition 7.1.2. of this permit the permittee will use TANKS 4.0 in order to perform calculations to determine the VOC and HAP emission rate anytime a change is made to the pump room tanks which may increase emissions.

[45CSR13, R13-2571, 4.2.6.]

7.3. Testing Requirements

7.3.1. Reserved.

7.4. Recordkeeping Requirements

- 7.4.1. The permittee shall keep records of the calculations required by condition 7.2.2. of this permit. These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.
[45CSR13, R13-2571, 4.4.6.]
- 7.4.2. The permittee shall keep records of individual tank capacities and the aggregate volume of all tanks in the pump room. These records shall be maintained on-site for a period of five (5) years and certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.
[45CSR§30-5.1.c.]

7.5. Reporting Requirements

- 7.5.1. Reserved.

7.6. Compliance Plan

- 7.6.1. None.

8.0. Source-Specific Requirements [Paint Spray Booth: Emission Point ID E12]

8.1. Limitations and Standards

- 8.1.1. The spray paint booth, E12, shall be designed operated and maintained such that emissions are routed to the plant RTOs. Accordingly, total emissions from the booth shall not exceed the following:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Particulate Matter	0.16	0.49
Volatile Organic Compounds	0.04	0.13
Total Hazardous Air Pollutants	0.04	0.13

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.
[45CSR13, R13-2571, 4.1.22.]

- 8.1.2. The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.
[40 C.F.R. § 63.803(f) and 45CSR34]

8.2. Monitoring Requirements

- 8.2.1. The permittee shall monitor all incoming materials and record such data in REGMET, or an equivalent emissions tracking system.
[45CSR§30-5.1.c.]

8.3. Testing Requirements

- 8.3.1. Reserved.

8.4. Recordkeeping Requirements

- 8.4.1. Reserved.

8.5. Reporting Requirements

- 8.5.1. Reserved.

8.6. Compliance Plan

- 8.6.1. None.

9.0. Source-Specific Requirements [U.V. Roll Coaters and Ovens: Emission Point ID's E-B8 and E-B9]

9.1. Limitations and Standards

9.1.1. Emissions from each of the U.V. Ovens, VOC-B3.2 and VOC-B3.4 (Emission Point ID# E-B8), shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Particulate Matter	0.01	0.03
Volatile Organic Compounds	0.04	0.76
Total Hazardous Air Pollutants	0.02	0.07

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.

9.1.1 Emissions from the UV Ovens shall not exceed the following limits:

<u>Pollutant</u>	<u>Maximum Hourly Emissions (lb/hr)</u>	<u>Maximum Annual Emissions (ton/year)</u>
<u>Particulate Matter</u>	<u>0.10</u>	<u>0.10</u>
<u>Volatile Organic Compounds</u>	<u>0.10</u>	<u>1.0</u>
<u>Total Hazardous Air Pollutants</u>	<u>0.10</u>	<u>0.10</u>

Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.

[45CSR13, R13-2571, 4.1.23-24.]

9.1.2 Spray paint booths SB02 and SB03 shall be vented to either RTO1 or RT02 unless water based paints are being used.

[45CSR13, R13-2571, 4.1.23]

9.1.2. Emissions from each of the UV Ovens, VOC-B6.2, VOC-B7.2, VOC-B8.2, and VOC-B9.2 (Emission Point ID# E-B9), shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Particulate Matter	0.04	0.08

Volatile Organic Compounds	0.04	0.10
Total Hazardous Air Pollutants	0.04	0.04

~~Compliance with the annual emission limits shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of the emissions at any given time for the previous twelve (12) consecutive months.~~

~~[45CSR13, R13-2571, 4.1.24.]~~

9.2. Monitoring Requirements

9.2.1. Reserved.

9.3. Testing Requirements

9.3.1. Reserved.

9.4. Recordkeeping Requirements

9.4.1. Reserved.

9.5. Reporting Requirements

9.5.1. The permittee shall fulfill all reporting requirements of §63.7 through §63.10 of subpart A (General Provisions) according to the applicability criteria in §63.800(d).
[40 C.F.R. § 63.807(a), and 45CSR34]

9.6. Compliance Plan

9.6.1. None.

10.0. Source-Specific Requirements [Wood Fuel Silo S1, Sawdust Hopper SD13: Emission Point ID's E23, E13]

10.1. Limitations and Standards

- 10.1.1. Wood waste fuel used to fire Wood Boiler B1 shall be stored in an enclosed Storage Silo S1. Emissions from Storage Silo S1 shall be vented to and controlled by Bin Vent/Baghouse (BV1), prior to release to the atmosphere. **[45CSR13, R13-2571, 4.1.7.]**
- 10.1.2. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to 45CSR§7-5.1 (10.1.3 of this permit) is required to have a full enclosure and be equipped with a particulate matter control device. **[45CSR§7-3.7., and 45CSR13, R13-2571, 4.1.35.]**
- 10.1.3. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. **[45CSR§7-5.1., and 45CSR13, R13-2571, 4.1.37.]**
- 10.1.4. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7. **[45CSR13, R13-2571, 4.1.34.]**
- 10.1.5. The stabilized static pressure loss across Bin Vent/Baghouse (BV1) shall remain between 0.5 to 4.0 inches of water anytime BV1 is operating. **[45CSR13, R13-2571, 4.1.8.]**
- 10.1.6. The total amount of sawdust delivered to hopper S13 [SD13] shall not exceed 5,000 pounds per hour nor 5,200 tons per year. **[45CSR13, R13-2571, 4.1.59.]**

10.2. Monitoring Requirements

- 10.2.1. For the purpose of determining compliance with the opacity limit set forth in 10.1.2. in this permit, the permittee shall conduct monthly visible emission checks and/or opacity monitoring and recordkeeping. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR60, Appendix A, Method 22 or from the lecture portion of the 40CFR60, Appendix A, Method 9 certification course.

The permittee shall conduct visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for emission points E23. The observations shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive test dates. These observations shall be conducted during periods of normal facility operation and appropriate weather conditions for a sufficient time interval, but no less than one

(1) minute, to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an opacity evaluation in accordance with 45CSR7A, within twenty-four (24) hours. An evaluation based upon 45CSR7A shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed.

[45CSR§7A-2.1.a. and 45CSR§30-5.1.c.]

10.2.2. The permittee shall daily monitor and record the stabilized static pressure loss across the bin vent/baghouse (BV1).

[45CSR13, R13-2571, 4.2.2.b.]

10.2.3. In order to determine compliance with the limits in condition 10.1.6. of this permit the permittee shall monitor and record the amount of sawdust transferred to the hopper [SD13] on a daily basis.

[45CSR13, R13-2571, 4.2.7.]

10.3. Testing Requirements

10.3.1. Reserved.

10.4. Recordkeeping Requirements

10.4.1. Reserved.

10.5. Reporting Requirements

10.5.1. Reserved.

10.6. Compliance Plan

10.6.1. None.