# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

April 12, 2018

PERMIT TO INSTALL 140-04C

ISSUED TO Springs Window Fashions, LLC

# LOCATED AT 2669 Industrial Drive Grayling, Michigan

IN THE COUNTY OF Crawford

# STATE REGISTRATION NUMBER B8707

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: March 23, 2018				
DATE PERMIT TO INSTALL APPROVED: April 12, 2018	SIGNATURE:			
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

# PERMIT TO INSTALL

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# **Common Abbreviations / Acronyms**

	Common Acronyms	P	ollutant / Measurement Abbreviations
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	со	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO <sub>2</sub> e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
СОМ	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H <sub>2</sub> S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	РМ	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO <sub>2</sub>	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	μg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

\* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

# **GENERAL CONDITIONS**

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. (R 336.1201(1))
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. (R 336.1201(4))
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. (R 336.1201(6)(b))
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. (R 336.1201(8), Section 5510 of Act 451, PA 1994)
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. (R 336.1219)
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. (R 336.1901)
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. (R 336.1301)
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
- Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). (R 336.1370)
- The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. (R 336.2001)

# SPECIAL CONDITIONS

# EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-PREDRYER1	Steam heated pre-dryer for drying wood prior to kiln drying. The steam is provided by a wood/natural gas-fired boiler.		FG-WOODDRY
EU-PREDRYER2	Steam heated pre-dryer for drying wood prior to kiln drying. The steam is provided by a wood/natural gas-fired boiler.		FG-WOODDRY
EU-KILN1	Steam heated aluminum kiln, with a capacity of 50 thousand board feet (MBF), for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas- fired boiler.		FG-WOODDRY
EU-KILN2	Steam heated aluminum kiln, with a capacity of 50 MBF, for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas-fired boiler.		FG-WOODDRY
EU-KILN3	Steam heated aluminum kiln, with a capacity of 50 MBF, for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas-fired boiler.		FG-WOODDRY
EU-KILN4	Steam heated aluminum kiln, with a capacity of 50 MBF, for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas-fired boiler.		FG-WOODDRY
EU-KILN5	Steam heated aluminum kiln, with a capacity of 50 MBF, for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas-fired boiler.	December 2017	FG-WOODDRY
EU-KILN6	Steam heated aluminum kiln, with a capacity of 50 MBF, for drying wood lumber prior to other woodworking processes. The steam is supplied by a wood/natural gas-fired boiler.	December 2017	FG-WOODDRY

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-1	Four (4) cutline saws, one (1) Forester 900 band saw, one (1) hog/grinder, one (1) Newman S-382 planer, one (1) Diehl SL-52 re-rip, and one (1) Wadkins slat molder (heads). This equipment is used for woodworking. Emissions are controlled by fabric filter dust collector #1.		NA
EU-2	Three (3) Diehl units (numbers 1, 3, and 5), one (1) uncontrolled finger joiner for adhesive application, one (1) Mereen Johnson 431 rip saw, and one (1) Ultimizer saw. This equipment is used for woodworking. Emissions are controlled by fabric filter dust collector #2.		NA
EU-3	Four (4) Weining molders (numbers 1, 2, 3, and 4), one (1) Wadkins slat molder (blades), one (1) Grecon optimizing chop saw, and one (1) Beaded slat molder. This equipment is used for woodworking. Emissions are controlled by fabric filter dust collector #3.		NA
EU-4	One (1) Cemco triple sander 3000, one (1) Cemco triple sander 4000, one (1) Profile sander, and two (2) Windswept Profile sanders (numbers 1 and 2). This equipment is used for woodworking. Emissions are controlled by fabric filter dust collector #4.		NA
EU-GLUER	One (1) Rosenquist edge gluer for adhesive application.		NA
EU-BOILER1	15.5 million BTU/hr wood/natural gas- fired boiler that provides steam to the pre- dryers and kilns. Emissions are controlled by a multiclone collector. The sawdust from the woodworking operations is used as a fuel.		NA

## The following conditions apply to: EU-1

**DESCRIPTION:** Four (4) cutline saws, one (1) Forester 900 band saw, one (1) hog/grinder, one (1) Newman S-382 planer, one (1) Diehl SL-52 re-rip, and one (1) Wadkins slat molder (heads). This equipment is used for woodworking.

#### Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector #1

#### I. EMISSION LIMITS

	Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements			
1.	Particulate	0.01 lbs/1,000 lbs of	Test Protocol*	EU-1	GC 13	R 336.1331			
	Matter (PM)	exhaust gas,							
	( )	calculated on a dry							
		gas basis							
2.	PM10	2.4 pph	Test Protocol*	EU-1	GC 13	40 CFR 52.21(c) & (d)			
*Te	est protocol sha	all specify averaging ti	*Test protocol shall specify averaging time.						

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EU-1 unless a malfunction abatement plan (MAP) as described in Rule 911(2), for the EU-1 dust collector, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

## IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EU-1 unless fabric filter dust collector #1 is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the pressure drop across the EU-1 fabric filter dust collector #1 on a continuous basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall record, in a satisfactory manner, the pressure drop across the EU-1 fabric filter dust collector #1 at least once per calendar day (when operating). (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- 2. The permittee shall keep, in a satisfactory manner, all daily pressure drop records for the EU-1 fabric filter dust collector, as required by SC VI.1 on file at the facility and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### VII. <u>REPORTING</u>

NA

## VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID Maximum Exhaust Diameter/Dimensions (inches)		Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-2	54.3	35.3	R 336.1225 40 CFR 52.21(c) & (d)

## IX. OTHER REQUIREMENTS

## The following conditions apply to: EU-2

DESCRIPTION: Three (3) Diehl units (numbers 1, 3, and 5), one (1) uncontrolled finger joiner for adhesive application, one (1) Mereen Johnson 431 rip saw, and one (1) Ultimizer saw. This equipment is used for woodworking.

#### Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector #2

# I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lbs/1,000 lbs of exhaust gas, calculated on a dry gas basis		EU-2	GC 13	R 336.1331
2. PM10	1.2 pph	Test Protocol*	EU-2	GC 13	40 CFR 52.21(c) & (d)
3. VOC	500 lbs/yr	12-month rolling time period as determined at the end of each calendar month	EU-2 (finger joiner)	SC V.1, VI.3	R 336.1702(a)

# **II. MATERIAL LIMITS**

NA

# III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall capture all waste adhesive materials from the finger joiner used in EU-2. The permittee shall store these materials in closed containers and shall dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))
- 2. The permittee shall not operate EU-2 unless a MAP as described in Rule 911(2), for the EU-2 dust collector, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

# IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EU-2 unless fabric filter dust collector #2 is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the pressure drop across the EU-2 fabric filter dust collector #2 on a continuous basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

# V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

1. The permittee shall determine the VOC content, water content and density of any coating or adhesive, as received and as applied, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702(a))

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating or adhesive, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for EU-2:
  - a) Gallons (with water) of each coating or adhesive used.
  - b) VOC content (with water) of each coating or adhesive as applied.
  - c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
  - d) VOC mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))** 

The permittee shall record, in a satisfactory manner, the pressure drop across the EU-2 fabric filter dust collector #2 at least once per calendar day (when operating). (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

5. The permittee shall keep, in a satisfactory manner, all daily pressure drop records for the EU-2 fabric filter dust collector, as required by SC VI.4 on file at the facility and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

# VII. <u>REPORTING</u>

NA

# VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID Maximum Exhaust Diameter/Dimensions (inches)		Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1	I. SV-3	67.7	36.1	R 336.1225 40 CFR 52.21(c) & (d)

# IX. OTHER REQUIREMENTS

# The following conditions apply to: EU-3

**DESCRIPTION:** Four (4) Weining molders (numbers 1, 2, 3, and 4), one (1) Wadkins slat molder (blades), one (1) Grecon optimizing chop saw, and one (1) Beaded slat molder. This equipment is used for woodworking.

#### Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector #3

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements	
1. PM	0.01 lbs/1,000 lbs of exhaust gas, calculated on a dry gas basis	Test Protocol*	EU-3	GC 13	R 336.1331	
2. PM10	2.2 pph	Test Protocol*	EU-3	GC 13	40 CFR 52.21(c) & (d)	
*Test protoco	*Test protocol shall specify averaging time.					

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EU-3 unless a MAP as described in Rule 911(2), for the EU-3 dust collector, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

## IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EU-3 unless fabric filter dust collector #3 is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the pressure drop across the EU-3 fabric filter dust collector #3 on a continuous basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall record, in a satisfactory manner, the pressure drop across the EU-3 fabric filter dust collector #3 at least once per calendar day (when operating). (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- 2. The permittee shall keep, in a satisfactory manner, all daily pressure drop records for the EU-3 fabric filter dust collector, as required by SC VI.1 on file at the facility and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### VII. <u>REPORTING</u>

NA

## VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	(inches)		Underlying Applicable Requirements
1. SV-4	66.5	43.8	R 336.1225 40 CFR 52.21(c) & (d)

#### IX. OTHER REQUIREMENTS

# The following conditions apply to: EU-4

**DESCRIPTION:** One (1) Cemco triple sander 3000, one (1) Cemco triple sander 4000, one (1) Profile sander, and two (2) Windswept Profile sanders (numbers 1 and 2). This equipment is used for woodworking.

#### Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT:** Fabric filter dust collector #4

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lbs/1,000 lbs of exhaust gas, calculated on a dry gas basis	Test Protocol*	EU-4	GC 13	R 336.1331
2. PM10	1.7 pph	Test Protocol*	EU-4	GC 13	40 CFR 52.21(c) & (d)
*Test protocol sl	hall specify averaging	time.			

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

- 1. The permittee shall not operate EU-4 unless a MAP as described in Rule 911(2), for the EU-4 dust collector, has been submitted within 60 days of permit issuance, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days, if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. (R 336.1301, R 336.1331, R 336.1910, R 336.1911, 40 CFR 52.21(c) & (d))

## IV. DESIGN/EQUIPMENT PARAMETERS

- 1. The permittee shall not operate EU-4 unless fabric filter dust collector #4 is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the pressure drop across the EU-4 fabric filter dust collector #4 on a continuous basis. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- The permittee shall record, in a satisfactory manner, the pressure drop across the EU-4 fabric filter dust collector #4 at least once per calendar day (when operating). (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))
- 2. The permittee shall keep, in a satisfactory manner, all daily pressure drop records for the EU-3 fabric filter dust collector, as required by SC VI.1 on file at the facility and make them available to the Department upon request. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### VII. <u>REPORTING</u>

NA

## VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SV-5	67.7	32.8	R 336.1225 40 CFR 52.21(c) & (d)

#### IX. OTHER REQUIREMENTS

#### The following conditions apply to: EU-GLUER

**DESCRIPTION:** One (1) Rosenquist edge gluer for adhesive application.

Flexible Group ID: NA

## POLLUTION CONTROL EQUIPMENT: NA

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	125 lbs/yr	12-month rolling time period as determined at the end of each calendar month	EU-GLUER	SC V.1, VI.3	R 336.1702(a)

#### II. MATERIAL LIMITS

NA

#### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste adhesive materials used in EU-GLUER. The permittee shall store these materials in closed containers and shall dispose of them in an acceptable manner in compliance with all applicable state rules and federal regulations. (R 336.1224, R 336.1702(a))

#### IV. DESIGN/EQUIPMENT PARAMETERS

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

 The permittee shall determine the VOC content, water content and density of any coating or adhesive, as received and as applied, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. (R 336.1225, R 336.1702(a))

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (R 336.1225, R 336.1702(a)) Springs Window Fashions, LLC (B8707) Permit No. 140-04C

- The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating or adhesive, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a))
- 3. The permittee shall keep the following information on a monthly basis for EU-GLUER:
  - a) Gallons (with water) of each coating or adhesive used.
  - b) VOC content (with water) of each coating or adhesive as applied.
  - c) VOC mass emission calculations determining the monthly emission rate in pounds per calendar month.
  - d) VOC mass emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))** 

# VII. <u>REPORTING</u>

NA

# VIII. STACK/VENT RESTRICTIONS

NA

# IX. OTHER REQUIREMENTS

#### The following conditions apply to: EU-BOILER1

**DESCRIPTION:** 15.5 million BTU/hr wood/natural gas-fired boiler that provides steam to the pre-dryers and kilns. The sawdust from the woodworking operations is used as a fuel.

Flexible Group ID: NA

#### POLLUTION CONTROL EQUIPMENT: Multiclone collector

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.01 lbs/1,000 lbs of exhaust gas, calculated on a dry gas basis	Test Protocol*	EU-BOILER1	GC 13	R 336.1331
1. PM10	0.75 pph	Test Protocol*	EU-BOILER1	GC 13, SC VI.3, VI.4	40 CFR 52.21(c) & (d)
*Test Protocol shall specify averaging time					

Test Protocol shall specify averaging time

# II. MATERIAL LIMITS

1. The permittee shall not burn in EU-BOILER1 any wood, wood residue, or wood waste which is painted or treated with wood preservatives; or any other waste materials not identified in the permit application.<sup>1</sup> (R 336.1225)

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

- 1. The permittee shall not operate EU-BOILER1 unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns and malfunctions has been submitted to the AQD District Supervisor and is implemented. The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. (R 336.1911, R 336.1912, 40 CFR 52.21(c) & (d))
- 2. The permittee shall initiate operation of EU-BOILER1 from a cold start using only sweet natural gas. (R 336.1225, R 336.1910, 40 CFR 52.21(c) & (d))

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EU-BOILER1 unless the multiclone collector is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) & (d))

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

# VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. (**R 336.1331, 40 CFR 52.21(c) & (d)**)
- 2. The permittee shall monitor and record, in a satisfactory manner, the hours of operation and wood fuel usage for EU-BOILER1 on a daily basis. (R 336.1205, R 336.1225, R 336.1331, 40 CFR 52.21(c) & (d))
- The permittee shall keep, in a satisfactory manner, average hourly PM10 emission calculation records for EU-BOILER1, calculated using the total daily wood fuel usage rate and daily hours of operation, on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1331, 40 CFR 52.21(c) & (d))
- The permittee shall keep, in a satisfactory manner, all daily hours of operation and wood fuel usage rate records for EU-BOILER1, indicating the pounds of wood fuel used on an average daily basis, on file at the facility and make them available to the Department upon request. (R 336.1205, R 336.1225, R 336.1331, 40 CFR 52.21(c) & (d))

# VII. <u>REPORTING</u>

NA

# VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

	Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1.	SV-1	30	45	R 336.1225 40 CFR 52.21(c) & (d)

#### IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart JJJJJJ for Industrial, Commercial, and Institutional Boilers Area Sources. (40 CFR Part 63, Subpart A and Subpart JJJJJJJ)

#### Footnotes:

<sup>1</sup>This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

## FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-WOODDRY	Two (2) pre-dryers and six (6) kilns heated with steam from the wood/natural gas-fired boiler and used to dry wood lumber prior to other woodworking processes.	EU-PREDRYER1, EU-PREDRYER2, EU-KILN1, EU-KILN2, EU-KILN3, EU-KILN4, EU-KILN5, EU-KILN6

#### The following conditions apply to: FG-WOODDRY

**DESCRIPTION:** Two (2) pre-dryers and six (6) kilns heated with steam from the wood/natural gas-fired boiler and used to dry wood lumber prior to other woodworking processes.

**Emission Units:** EU-PREDRYER1, EU-PREDRYER2, EU-KILN1, EU-KILN2, EU-KILN3, EU-KILN4, EU-KILN5, EU-KILN6

# POLLUTION CONTROL EQUIPMENT: NA

#### I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC (as carbon)	30.0 tpy <sup>A</sup>	12-month rolling time period as determined at the end of each calendar month	FG-WOODDRY	SC VI.2	R 336.1225, R 336.1702(a)
<sup>A</sup> VOC calculations are based on the amount of wood dried in thousand board feet (MBF) multiplied by its corresponding VOC emission factor in pounds carbon per thousand board feet (lbs C/MBF).					

#### II. MATERIAL LIMITS

- 1. The permittee shall not process more than 195 MBF of raw wood through FG-WOODDRY per calendar day. (R 336.1205, R 336.1225, R 336.1702(a))
- 2. The permittee shall process only hardwood in FG-WOODDRY. For the purpose of this permit, hardwood is defined as the wood of a broad-leafed tree, either deciduous or evergreen. (R 336.1225, R 336.1702(a))
- 3. The VOC content of all hardwood processed in FG-WOODDRY shall not exceed 0.39 lbs/MBF. (R 336.1225, R 336.1702(a))

#### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate EU-PREDRYER1 or EU-PREDRYER2 at a temperature in excess of 120°F. (R 336.1225, R 336.1702(a))

# IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall install, calibrate, maintain and operate in a satisfactory manner, a device to monitor the temperature of EU-PREDRYER1 and EU-PREDRYER2 on a continuous basis. (R 336.1225, R 336.1702(a))

# V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- 1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702(a))**
- 2. The permittee shall keep the following records on a monthly basis for FG-WOODDRY:
  - a) Amount and type of each raw wood processed in MBF per day.
  - b) Amount and type of each raw wood processed in MBF per calendar month.
  - c) VOC emission factors for each type of raw wood processed. VOC emissions are based on NCASI emission factors or an alternative method acceptable to the AQD District Supervisor.
  - d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
  - e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. (R 336.1225, R 336.1702(a))

- 3. The permittee shall record, in a satisfactory manner, the temperature of EU-PREDRYER1 and EU-PREDRYER2 at least once per calendar day (when operating). (R 336.1225, R 336.1702(a))
- 4. The permittee shall keep, in a satisfactory manner, all temperature records for EU-PREDRYER1 and EU-PREDRYER2, as required by SC VI.3 on file at the facility and make them available to the Department upon request. (R 336.1225, R 336.1702(a))

#### VII. <u>REPORTING</u>

# VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements				
1. SV-10 (EU-PREDRYER1)	54	32	R 336.1225, 40 CFR 52.21(c) & (d)				
2. SV-11 (EU-PREDRYER1)	54	32	R 336.1225, 40 CFR 52.21(c) & (d)				
3. SV-12 (EU-PREDRYER1)	54	32	R 336.1225, 40 CFR 52.21(c) & (d)				
4. SV-13 (EU-PREDRYER1)	54	32	R 336.1225, 40 CFR 52.21(c) & (d)				
5. SV-14 (EU-PREDRYER1)	54	32	R 336.1225, 40 CFR 52.21(c) & (d)				
6. SV-15 (EU-PREDRYER2)	54	31.5	R 336.1225, 40 CFR 52.21(c) & (d)				
7. SV-16 (EU-PREDRYER2)	54	31.5	R 336.1225, 40 CFR 52.21(c) & (d)				
8. SV-17 (EU-PREDRYER2)	54	31.5	R 336.1225, 40 CFR 52.21(c) & (d)				
9. SV-18 (EU-PREDRYER2)	54	31.5	R 336.1225, 40 CFR 52.21(c) & (d)				
10. SV-19 (EU-PREDRYER2)	54	31.5	R 336.1225, 40 CFR 52.21(c) & (d)				
11. SV-20 <sup>B</sup> (EU-KILN1)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
12. SV-21 <sup>B</sup> (EU-KILN1)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
13. SV-22 <sup>B</sup> (EU-KILN2)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
14. SV-23 <sup>B</sup> (EU-KILN2)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
15. SV-24 <sup>B</sup> (EU-KILN3)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
16. SV-25 <sup>B</sup> (EU-KILN3)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
17. SV-26 <sup>B</sup> (EU-KILN4)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
18. SV-27 <sup>B</sup> (EU-KILN4)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
19. SV-28 <sup>B</sup> (EU-KILN5)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
20. SV-29 <sup>B</sup> (EU-KILN5)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
21. SV-30 <sup>B</sup> (EU-KILN6)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
22. SV-31 <sup>B</sup> (EU-KILN6)	NA	20	R 336.1225, 40 CFR 52.21(c) & (d)				
<sup>B</sup> These stack designations represent a row of vents in the side of the kiln.							

# IX. OTHER REQUIREMENTS