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Facility Name: **The Longaberger Company**

Application Number: **06-5469**

Date: **August 19, 1998**

### **GENERAL PERMIT CONDITIONS**

#### **TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

#### **CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations.

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Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

#### **PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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**BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

Facility Name: **The Longaberger Company**Application Number: **06-5469**Date: **August 19, 1998**AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **The Longaberger Company** located in **Muskingum** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
F008	Basket forms equipment vented to a baghouse	Vent to a dust collector which will achieve an outlet emissions rate of 0.010 gr/dscf or no visible emissions, whichever is less stringent.	3745-31-05	Vent to a dust collector which will achieve an outlet emission rate of 0.010 gr/dscf or no visible emissions, whichever is less stringent. This source is limited to 7.4 tons per year of particulate emissions.
F002	Roadways and parking areas - paved	There shall be no visible particulate emissions from any paved roadways or parking area except for a period of time not to exceed 1 minute during any 60-minute observation period.	3745-31-05	Particulate matter (PM) emissions from the plant roadways and parking areas shall not exceed 6.6 tons per year.
	Unpaved	There shall be no visible particulate emissions from any unpaved roadway or parking area except		

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
F002 Cont'd				for a period of time not to exceed 3 minutes during any 60-minute observation period.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate	14.0

**CONSTRUCTION STATUS**

The **Ohio EPA, Southeast District Office** shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: **F008 - forms shop and F002 - new roadways.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

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**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**I. Additional Terms and Conditions - Basket Forms Shop**

**A. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall perform daily checks for any visible particulate emissions from the exhaust of the fabric filter control system. The presence or absence of any visible emissions from the exhaust of the fabric filter control system shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: Exhaust from this emissions unit is currently vented back into the building. This is the normal operating mode for this emissions unit.

**B. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all days during which visible particulate emissions are observed from the exhaust of the fabric filter control system.
2. The reports shall be submitted on:
  - a. January 31 of each year and shall cover the period from July 1 until December 31; and,
  - b. July 31 of each year and shall cover the period from January 1 until June 30.

If no visible particulate emissions are observed from the exhaust of the fabric filter control system during a given period, the permittee shall submit a report which states that no visible particulate emissions were observed from the exhaust of the fabric filter control system during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

**C. Testing Requirements**

1. Compliance with the particulate matter emission limit of 0.030 grain per dry standard cubic foot of exhaust gases shall be determined based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limitation, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
2. Compliance with the visible emission limit shall be determined through visible emission observations.
3. Compliance with the particulate matter emission limit of 7.4 tons per year shall be determined in accordance with the following equation:

$$\begin{aligned} \text{tons PM/year} = & (0.010 \text{ gr/dscf}) \times (20,000 \text{ dscf/min}) \\ & \times (\text{pound}/7,000 \text{ gr}) \times (60 \\ & \text{minutes/hour}) \times (\text{ton}/2,000 \text{ pounds}) \times \\ & (\text{actual hours of operation/year}) \end{aligned}$$

The flow rate of 20,000 dscf/min represents the maximum flow rate of exhaust gases from the control equipment, based on company data.

No testing or recordkeeping is specifically required to demonstrate compliance with this emission limitation, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

## **II. Additional Terms and Conditions - Roadways and Parking Areas**

### **A. Roadways and Parking Areas**

1. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

#### Paved roadways:

Loop Road  
Service  
Woodcrafts Loop  
Barn Loop  
Employment Road  
Homestead Service Roads

#### Paved parking areas:

East A  
North A  
South A  
Family Center  
EDC  
West A  
Handles No. 1  
Security  
South B  
West B  
Northwest B  
Employee Lot  
Visitor Lot

2. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:

Unpaved roadways:

Woodcrafts Service  
Nursery Loop  
Fleet Loop  
Brill Road  
WWTP Loop

Unpaved parking areas:

North B  
Handles No. 2  
Chipper  
Woodcrafts South  
Woodcrafts North  
Construction  
Fleet  
North Fleet  
Barn

3. The permittee shall employ reasonably available control measures on all paved and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing, with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
4. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
5. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this

paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

6. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
7. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
8. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
9. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

**B. Operational Restrictions**

1. A maximum speed limit of fifteen (15) miles per hour shall be posted and enforced on the parking areas and a maximum speed limit of twenty five (25) miles per hour shall be posted and enforced on the roadways.

**C. Monitoring and/or Recordkeeping Requirements**

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

<u>Paved Roadways and Parking Areas</u>	<u>Minimum Inspection Frequency</u>
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All	Daily
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<u>Unpaved Roadways and Parking Areas</u>	<u>Minimum Inspection Frequency</u>
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All	Daily
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The purpose of the inspections is to determine the need for implementing the control measures specified in the Additional Terms and Conditions. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

The permittee may, upon receipt of written approval from the Ohio EPA, Southeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

2. The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and,
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 2.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

**D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and,
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The reports shall be submitted on:
  - a. January 31 of each year and shall cover the period from July 1 until December 31; and,
  - b. July 31 of each year and shall cover the period from January 1 until June 30.

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**E. Testing Requirements**

1. Compliance with the emission limitations for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

**F. Miscellaneous**

1. This Permit to Install shall supersede all the air pollution control requirements contained in the permit to install no. 06-4037 issued on March 16, 1994 and modified on July 9, 1997 for this emissions unit.