

November 26, 2008

Ohio Environmental Protection Agency  
Division of Air Pollution Control  
Permit Management Unit  
P. O. Box 1049  
Columbus, Ohio 43216-1049

Re: Title V Permit Application  
for the Archbold Container Company,  
Ohio EPA Premise No. 0326000160

To Whom it May Concern:

Enclosed is the application of Archbold Container Company for an operating permit (Title V permit) as required by Chapter 3745-77 of the Ohio Administrative Code (OAC). Archbold Container is one of seven Sauder-related plants: Sauder Manufacturing, Archbold Container Company, Sauder Woodworking Product Design, Sauder Woodworking Maintenance and Engineering, Sauder Woodworking Sauder Street, Sauder Woodworking Brush Creek, and Sauder Woodworking Barre Road. All of the listed plants are considered one facility for Title V applicability purposes. Each of the seven operations is submitting a separate Title V permit application. This will allow the plant's responsible official to certify compliance with a higher degree of assurance. Discussed below are a number of key points related to the development of this application.

## **1. Timely and Complete Permit Application**

Since Archbold Container requested a 90-day filing extension, the facility was required to submit a timely and complete Title V permit application no later than February 27, 1996, per OAC 3745-77-04(B)(1). The Archbold Container Title V application was not submitted on this date for the following reasons:

- Archbold Container believed that the facilities would not be grouped together for Title V applicability determination. Once the facility discovered that the seven facilities would be considered one facility under Title V, more time was needed to coordinate the permitting effort.
- Due to the complexity of the plants, and the relationship between plants, we did not have the data gathered by the February deadline so that the responsible officials could certify compliance. The information for each plant has now been compiled so that the responsible officials can certify all the information is true, accurate and complete.

USEPA and Ohio EPA consider an application timely for purposes of the Application Shield if it is submitted by September 29, 1996. Once the application is determined to be timely and complete (either by Ohio EPA determination or automatically), pursuant to OAC rule 3745-77-06, Archbold Container will be authorized to operate until the time that Ohio EPA issues an operating permit to the plant (i.e., the plant will be authorized to operate under the application shield). Archbold Container believes that the enclosed application represents a complete Title V permit application.

## **2. Organization of the Application**

The application for Archbold Container is being submitted electronically in the STARShip software package. The software package includes the completed application forms, and this cover letter. The required flow diagrams will be submitted as hard copies with the certification.

It is our understanding that once this application is submitted electronically, a certification of compliance statement will be generated automatically and must be completed by Archbold Container and returned to the Ohio EPA before the 60 day review period begins. Thus, a certification of compliance statement is not part of this initial electronic submission.

## **3. Numbering of Emission Units**

In accordance with discussions with Mr. Mark Barber of the NWDO of Ohio EPA, the emission units have been assigned new identification numbers to reflect the facility in which the unit is located. To easily identify which emission units are associated with each facility each facility is using a different 100 series of numbers. Archbold Container is using ID numbers in the 700's. The attached table presents the numbering system along with old EPA identification numbers if applicable.

## **4. The Permit Shield**

The Ohio operating permit regulations (OAC rule 3745-77-07 (F)) provide that operating permits *shall* include a permit shield; *i.e.* compliance with all applicable requirements included in the operating permit will be considered to be compliance with all applicable federal and state requirements. The Archbold Container operating permit application contains two categories of information directed toward defining the scope of the shielded permit.

- First, Archbold Container has completed within the STARShip program a summary of current emissions requirements for each non-insignificant emissions unit in the

plant. This program contains a complete description of all federal requirements that are applicable to these emission units.

- Second, this application cover letter contains a discussion of "operational flexibility" (i.e., a description of activities that are authorized by the permit and, therefore, may be conducted without the need for an operating permit revision). The activities described in this section are inherent elements of the ongoing operation and, therefore, are not changes in the sense that they have any independent legal significance (i.e., they do not trigger minor or major New Source Review (NSR), applicable New Source Performance Standards (NSPS), applicable NESHAPs, Section 112(g), or other applicable requirements not contained in the permit). In other words, these activities are not: (1) physical changes or changes in the method of operation that would trigger NSR; (2) modifications that would trigger Section 112(g) requirements, NSPS, or other potentially applicable requirements; or (3) activities that would trigger the need for a Title V permit revision.

We believe the compilation of applicable requirements and the non-applicability determination are all necessary to define the proper scope and function of the permit shield.

## **5. The Relationship of the Title V Permit to Existing Applicable Requirements**

Since the permit shield provision will provide that compliance with the operating permit will be considered to be compliance with all state and federal applicable requirements, Archbold Container understands that the operating permit will supersede existing permits to install/operate and other applicable requirements. In other words, the Archbold Container operating permit will contain *all* requirements determined to be applicable to the plant and, to the extent that the operating permit contains terms and conditions that are different from or inconsistent with those in existing permits or other applicable requirements, compliance with the operating permit *will be* deemed compliance with the applicable requirement. We request Ohio EPA's confirmation that all existing air permits will be superseded by the Title V operating permit and that the existing air permits will be null and void after issuance of the Title V operating permit.

## **6. Existing Applicable Requirements**

This section contains information relevant to the facility's compliance determination. The rules listed below do not represent all of the facility's applicable requirements.

- I. OAC 3745-17-07 Control of Visible Particulate Emissions from Stationary Sources

The permit application does not designate OAC 3745-17-07 as an applicable requirement for the non-insignificant emission units at Archbold Container. This is because the non-insignificant emission units vent inside the building.

II. OAC 3745-17-11 Restrictions on Particulate Emissions from Industrial Processes

Any industrial process equipment that is not exempt or is not subject to another particulate emission standard is subject to the general limitations set forth in this rule. However, non of the non-insignificant emission units at Archbold Container vent directly to the atmosphere.

III. OAC 3745-21 Carbon Monoxide, Ozone Hydrocarbon Air Quality Standards and Related Emission Requirements

The carbon monoxide restrictions in the rule are not applicable to any of Archbold Container's emission units. Part 3745-21-07 of this rule, which deals with limiting VOC emissions, is applicable to the facility. However, based the processes at Sauder Woodworking this rule does not impose any emissions limitations or other requirements.

IV. 40 CFR 52.21 Title I Condition: Limits to Avoid Classification as a Major Source

In order to not be considered a major source under New Source Review the facility is accepting a facility wide cap on VOC emissions. Each of the seven Sauder plants is accepting a cap on VOC emissions so as to not be considered a major source under New Source Review. Archbold Container is accepting a cap of 70 tons per year on emissions of VOCs.

V. Regulations and Other Guidance Relevant to Preparation of Application

In preparing this Title V operating permit application, Sauder has relied upon the following regulations and guidance documents, among other materials:

- a. OAC 3745-77 - Title V Permits, including reference to 40 CFR Part 70.
- b. Ohio EPA STARShip User's manual, Version 1.1.
- c. USEPA guidance document entitled *White Paper for Streamlined Development of Part 70 Permit Applications*, issued July 10, 1995 by

memorandum from Lydia N. Wegman, Deputy Director, Office of Air Quality Planning and Standards.

- d. Ohio EPA Division of Air Pollution Control's compilation of the State Implementation Plan.
  - e. Ohio EPA Division of Air Pollution Control Engineering Guidance Documents.
- VI. Title V Operating Permit Not to Incorporate by Reference Information in Permit Application

Consistent with EPA's July 10, 1995 White Paper, Archbold Container Company understands that the Title V operating permit will not be construed to incorporate by reference any information contained in this permit application, except where the operating permit provides express reference to specific information contained in the application.

If you have any questions or comments on this application, please call me at (419) .

Sincerely,

John M. Kotowski  
Plant Manager

ACCOV.WPD

Enclosure

## OPERATING FLEXIBILITY

The Archbold Container manufacturing operation is typically described in terms of its principle operation, which is corrugated and solid fiber boxes and related products from purchased paperboard or fiber stock. The wood furniture manufacturing operation as designed and implemented is a dynamic enterprise. Each principle operation periodically engages in a number of activities that are vital and inherent elements of the ongoing operation. Such activities are not *changes* in the sense that they have any independent legal significance (*i.e.*, they do not trigger minor or major New Source Review, applicable NSPS, applicable NESHAPs, §112(g), or other applicable requirements not contained in the permit); rather, these activities are consistent with the design of the operation. In other words, such activities are not: (1) physical changes or changes in the method of operation that would trigger New Source Review (NSR); (2) modifications that would trigger §112(g) requirements, New Source Performance Standards (NSPS), or other potentially applicable requirements; or (3) activities that would trigger the need for a Title V permit revision.

Specifically, the following activities may be conducted by the plant without triggering the need for a permit revision *provided* the plant continues to comply with all terms and conditions of the Title V permit:

- Relocation of or physical changes to equipment within the facility.
- Changes in materials used in emission units.
- Changes in product mix, production rates, and hours of operation.

Of course, this is not a comprehensive list of all activities that: (1) are not physical changes or changes in the method of operation that would trigger NSR, NSPS, §112 (g), or other applicable requirements; and (2) may be conducted without triggering the need for a permit revision. These are provided as *examples* of such activities.

Archbold Container understands that the Title V permit is a comprehensive statement of requirements applicable to the facility and not a comprehensive statement of the facility's permissible activities and that the facility will be authorized to conduct any activity that is not addressed by or not inconsistent with the permit. Moreover, activities that are unregulated under the Clean Air Act and Ohio Administrative Code or that do not trigger applicable requirements are beyond the scope of the Title V permitting program and, therefore, do not trigger Title V requirements.

**Archbold Container Company  
Reassignment of Emission Unit  
Identification Numbers**

<b>Emission Source</b>	<b>Old Source ID</b>	<b>New Source ID</b>	<b>Source Classification</b>
EPS Pre-Expander and Molding Unit	not previously assigned	P700	non-insignificant
Curing, Fabrication, and Storage	not previously assigned	P701	non-insignificant