



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

February 3, 2016

CERTIFIED MAIL

91 7199 9991 7035 6665 8882

Chris Groves
242 Callahan Road
Post Office Box 160
Craigsville, WV 26205

Re: Columbia West Virginia Corporation
Craigsville, WV Facility
Permit No. R13-1361F
Plant ID No. 067-0023

Dear Mr. Groves:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-1361F is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

As a result of the granting of this permit, the source is not subject to 45CSR30.

In accordance with 45CSR22 - Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the Certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

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.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1257.

Sincerely,



John Legg
Permit Writer

Enclosures

c: Denver Tyler, Columbia West Virginia Corporation
Heather Bartlett, SLR International Corporation

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Update



R13-1361F

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

**Columbia West Virginia Corporation
Craigsville
067-00023**

A handwritten signature in blue ink, appearing to read "William F. Durham", written over a horizontal line.

*William F. Durham
Director*

Issued: February 2, 2016

This permit will supercede and replace Permit R13-1361E.

Facility Location: Craigsville, Nicholas County, West Virginia

Mailing Address: P.O. Box 160
Craigsville, WV 26205

Facility Description: Hardwood veneer core and plywood manufacturing facility

SIC Codes: 2435

UTM Coordinates: 529.9 km Easting • 4,234.6 km Northing • Zone 17

Permit Type: Class II Administrative Update

Description of Change: This update applies to the finishing and activities associated with the veneer cores operation. It allows Columbia to use a limited amount (200 gallon) of wood patching or filling compounds having a higher VOC content by weight (ranging from > 0.2% through ≤ 14.4%) than what was previously permitted (≤ 0.2%). Note that the VOC hourly (0.31 lb/hr) and annual (1.35 TPY) emission limits from using patching or filling compounds did not change because of this update.

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.

As a result of the granting of this permit, the source is not subject to 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Waste-wood fired boiler		98.7 MMBtu/hr	Multiclone
2S	2E	Waste oil burner		21,900 gal/yr	
Dryer 1	3Ea, 3Eb, 3Ec, 3Ed, 3Ee, 3Ef	COE Model 72 Veneer Dryer		21 MSF- $\frac{3}{8}$ "/hr	
Dryer 2	4Ea, 4Eb, 4Ec, 4Ed, 4Ee, 4Ef	COE Model 72 Veneer Dryer		16.5 MSF- $\frac{3}{8}$ "/hr	
P-VOC	5E	Plywood Line		16.64 MSF- $\frac{3}{8}$ "/hr	
6S	Fugitive	Log Steaming Vat		200,000 MSF- $\frac{3}{8}$ "/yr	
7S	Fugitive	Finger-Joint Line	2005	109,971 lb/yr	
8S	Fugitive	Putty Line		1,500,000 lb/yr	
P-SAW	E10	Plywood Sawing Operations			Baghouse (BH1)
P-SAND	E11	Plywood Sanding Operations			Baghouse (BH2)

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 (45 CSR § 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	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-1361E. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1361, R13-1361A, R13-1361C, R13-1361D, R13-1361E, R13-1361F and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. 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;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

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 administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records 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.

2.7. Duty to Supplement and Correct Information

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.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

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.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable 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.

- 2.12.2. 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 Section 2.12.3 are not met.
- 2.12.3. 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. 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 must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should 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.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

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

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

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 defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

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, owner, or operator 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). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§15]
- 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. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **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 45 C.S.R. 11.
[45CSR§11-5.2.]
- 3.1.7. Total combine emissions from the permitted facility shall not exceed the following limits:
- a. Emissions of particulate matter less than 10 micros (PM_{10}) shall not exceed 96.8 tons per year;
 - b. Emissions of particulate matter less than 2.5 micros ($PM_{2.5}$) shall not exceed 87.1 tons per year;
 - c. Emissions of oxides of nitrogen (NO_x) shall not exceed 89.0 tons per year;
 - d. Emissions of carbon monoxide (CO) shall not exceed 98.9 tons per year; and

e. Emissions of volatile organic compounds (VOC) shall not exceed 98.6 tons per year.

3.1.8. The entire facility shall not exceed 10 TPY of any single HAP or 25 TPY of any combination of HAPs. The following conditions establishes source specific emissions limits or operating limitations that limits the entire facility's release of HAPs below the above mentioned limits.

3.2. Monitoring Requirements

[Reserved]

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 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as 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. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- 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.

- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

3.4.2. **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§4. *State-Enforceable only.*]

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.

3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

- 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, or mailed first class 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 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The facility shall employ one 98.7 MMBtu/hr waste wood-fired boiler. The operation and maintain of this boiler unit shall not exceed the following operating and emission limitations:

- a. Hourly heat input into the boiler shall not exceed 98.7 MM Btu/hr;
- b. Annual heat input into the boiler shall not exceed 807,761 MMBtu/year;
- c. The boiler shall be limited to consuming wood waste;
- d. Emissions to the atmosphere generated by operation of the boiler and venting through the stack identified as Emission Point 1e shall not exceed following:

Source	PM/PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Waste-Wood Boiler	16.48	67.45	2.47	10.10	21.71	88.85	21.52	88.05	0.05	0.22

- e. The boiler shall be inspected and tuned to optimize performance and minimize emissions (boiler tuning) on an annual basis.
- f. Visible emissions from the boiler stack (discharge point) shall not exceed 10% opacity. [45CSR§2-3.1]
- g. The boiler shall not be operated unless flue gas generated by operation of the boiler is passed through the multiclone collector prior to being discharged to the atmosphere. Such multiclone shall be operated and maintained within the pressure drop range as establish in Condition 4.3.1.;
- h. The permittee shall install, maintain, calibrate a device that continuously measures the pressure drop across the multiclone. The monitoring device shall be certified by to be accurate within ± 1 inch water gauge.
- i. The permittee shall developed and implement a monitoring plan that will allow the permittee to determine the amount of heat imputed into this fuel burning unit (1S) on a daily basis. Such plan consist of the following:
 - i. The permittee shall install, maintain, and calibrate a device and/or system that measures and records the oxygen content of the flue gas from the boiler. Such device shall be calibrated at the minimum once per year.
 - ii. The permittee shall install, maintain, and calibrate a device and/or system that measure and records the temperature of the flue gas from the boiler. Such device shall be calibrated at the minimum once per year.

- iii. The permittee shall install, maintain, and calibrate a device(s) and/or system that measures and records the flow rate of steam produced from the boiler. Such device shall be calibrated at the minimum once per year;
- iv. The permittee shall install, maintain, and calibrate a device that measured the pressure of the steam produce from the boiler. Such device shall be calibrated at the minimum once per year.
- v. The plan shall define a pressure range of the steam produce from the boiler at normal operating condition and while the boiler is at idle conditions;
- vi. The parameters listed in items I. through iii. shall be measured and recorded on a frequency of at least than once per hour.
- vii. In the plan, the permittee shall identify all inputs to be used in the Steam System Assessment Tool, other program, or calculation method to determine or predict the amount of heat energy inputted into the boiler. The permittee shall identify which of these inputs, which are not variables that are being monitored, do not require to be monitoring and why it does not need to be monitored.

All measuring and recording device as listed in this condition and in the monitoring plan shall be install, calibrated and operational by no later than July 10, 2010. The permittee shall implement this monitoring plan no later than July 10, 2010. For periods greater than two hours where the monitoring data was lost or not obtain for any reason, the permittee shall account for this lost data by using the total design heat input of the boiler as the actual heat input for this period.

A written copy of this plan shall be maintained on site for the life of this permit.

- j. The permittee shall construct at a minimum a cover over the walking floor to minimize the exposure from the weather by no later than July 10, 2010.
 - k. The permittee shall develop, adhere, and review annually an Operation and Maintain Plan (O&M Plan) for this boiler.
- 4.1.2. The facility shall employ two hard wood veneer dryers. Such dryers are identified as Dryer 1 and Dryer 2. The operation of these emission units shall not exceed the following operating and emission limitations:
- a. Emissions to the atmosphere generated by operation of the dryers shall not exceed following:

Source	PM		PM ₁₀		PM _{2.5}		CO		VOC		Total HAPs	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Dryer 1	4.62	22.0	2.73	13.0	0.69	3.3	2.27	10.8	19.25	91.7	1.63	7.8
Dryer 2	3.63		2.15		0.54		1.78		15.12		1.28	

- b. The feed rate of green, hardwood veneer into Dryer 1 shall not exceed 21.0 MSF - 3/8" per hour;
- c. The feed rate of green, hardwood veneer into Dryer 2 shall not exceed 16.5 MSF - 3/8" per hour;
- d. The combined annual feed rate of green, hardwood veneer into both dryers shall not exceed 200,000 MSF - 3/8" per year;
- e. These two dryers shall only use steam generated from the waste wood boiler. Each dryer shall only have three heated zones and one cooling zone. Each heated zone shall be equipped with a separate vent and the cooling zone has three vents stacks (emission points).
- f. Visible emissions from each vent stack of each dryer shall not be discharged to the atmosphere greater than 20% opacity.
[45CSR§7-3.1]

4.1.3. The facility shall employ one plywood press. Such press is identified as P-VOC. The operation of this emission unit shall not exceed the following operating and emission limitations:

- a. Emissions to the atmosphere generated by operation of the plywood press and venting through the Emission Point 5E shall not exceed following:

Source	PM/PM ₁₀ /PM _{2.5}		VOC		Formaldehyde		Methanol		Methyl Isobutyl Ketone		Phenol	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Plywood Press	1.43	6.3	0.78	3.4	0.01	0.03	0.15	0.7	0.09	0.4	0.18	0.8

- b. The hourly production rate of the plywood press shall not exceed 16.64 MSF - 3/8" per hour;
- c. The annual production rate of the plywood press shall not exceed 145,766 MSF - 3/8" per year;
- d. The permittee shall be limited to using a resins that contain zero HAPs and has a VOC content of no greater than 0.12% by weight;

- e. Visible emissions from the plywood press shall not be discharged to the atmosphere in amounts greater than 20% opacity.
 [45CSR§7-3.1]
- 4.1.4. The facility shall employ one finger-jointer line. The operation of this emission unit shall not exceed the following operating and emission limitations:
 - a. Particulate matter generated from the line shall be collected and routed to the fabric filter control device identified as the Composer Baghouse (BH1);
 - b. VOC and total HAP emissions from the line shall not exceed 0.7 TPY and 0.23 TPY respectively. Compliance with these emission limits is met by limited the amount of adhesive consumed by the line to 109,971 pounds per year; and
 - c. The adhesive consumed by this line shall not have a VOC content of greater than 1.3% by weight and a total HAP content of greater than 0.42% by weight.
- 4.1.5. The finishing operation and associated activities of the veneer cores shall be operated and maintained in accordance with the following limitations:
 - a. Particulate matter generated from the sawing of veneer cores (P-SAW) and sanding activities (P-SAND) shall be collected and routed to a fabric filter control device(s) as listed in Table 1.0 of this permit.
 - b. Emissions to the atmosphere from Emission Point 10E and 11E shall not exceed following:

Emission Point	Pollutant	Hourly Emission Limits lb/hr	Annual Emission Limits TPY
E10 (Composer Baghouse)	PM/PM ₁₀ /PM _{2.5}	1.59	6.96
E11 (Sander Baghouse)	PM/PM ₁₀ /PM _{2.5}	0.64	2.79

- c. Visible emissions from Emission Points E10 and E11 shall not exceed 20% opacity.
 [45CSR§7-3.1]
- d. VOC emissions from the use of patching or filling compounds shall not exceed 1.35 TPY.
- e. Compliance with the annual VOC emission limit in 4.1.5.d shall be met by limiting the use of patching or filling compounds to the following amounts:
 - 1) 200 gallons per year (gal/yr) for filling compounds having manufacturers' VOC contents greater than 0.2% by weight, but less than or equal to 14.4% by weight. For these 200 gallons:
 - a) The hourly VOC emission rate of 0.31 lb/hr shall not be exceeded.

- b) So as not to exceed the 0.31 lb/hr VOC emission rate, a maximum filling compound application rate can be calculated:

- The application time T (in hours) for a gallon of filling compound can be calculated by the following equation:

$$T = W \times \% / 31$$

where: T = Application time (hrs)
W = Weight (lbs) of a gallon of wood filler compound
% = VOC percent by weight in wood filler compound
(% ranging > 0.2 and ≤ 14.4)

- The maximum application rates (gal/hr and lb/hr) can be calculated by the following equations:

$$\text{By Filling Compound Volume (gal/hr)} = 1 / T$$

$$\text{By Filling Compound Weight (lb/hr)} = W / T$$

- c) Records of the following information shall be kept for each time a wood patching compound (VOC content by weight > 0.2% but ≤ 14.4%) is used: Filling Compound name; total amount of filling compound used; total time over which filling compound was applied; calculated hourly VOC emission rate; and total amount of VOC emitted.

- 2) 1,164,000 pounds per year of any patching or filling compounds with a VOC content of 0.2% by weight or less.

- 4.1.6. VOC and total HAPs emissions from the log steaming vat (Unit 6S) shall not exceed 1.2 TPY. Compliance with this emission limit shall be met by limited the annual veneer dryer throughput limit of Condition 4.1.2.d. which is 200,000 MSF - %".
- 4.1.7. The waste oil burner shall be limited to consuming no more than 21,900 gallons of waste oil per year.
- 4.1.8. The annual or yearly limitation use in the above conditions shall mean ten - 36.5 day cycles rolling total.
- 4.1.9. **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.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1. For emission units 1S, 2S, Dryer 1, Dryer 2 and P-VOC, the permittee shall keep and maintain the following records in accordance with condition 3.4.1. of this permit:
- a. Date and time of start-up and shutdown by unit
 - b. Steam flow rate from the boiler;
 - c. Monitor the steam pressure from the boiler on a hourly basis and the and noted when it outside of the normal operating range as defined in the 4.1.1.i.v.;
 - d. Oxygen content and temperate of the flue gas from the boiler; and
 - e. Production rates of Dryer 1, Dryer 2 and P-VOC on daily basis.
- 4.2.2. For the purpose of ensuring compliance with Conditions 4.1.4.b.; 4.1.5.d. and 4.2.5.e.; and 4.1.7. the permittee shall monitor and record the amount of adhesive, filling compounds and waste oil consumed at the facility on a 36.5 day cycle basis. Such records shall be maintained in accordance with Condition 3.4.1 of this permit.
- 4.2.3. For the purpose of demonstrating compliance with the visible emission limit of 4.1.1.f. of this permit, the permittee shall conducted opacity readings of the visible emissions from the waste wood boiler's stack (Emission Point 1E) by certified persons and in accordance with 40 CFR 60 Method 9. A set of readings will be taken at least once per week, with each set of readings covering one continuous, six minute period while the boiler is operating. If, after a period of four consecutive weeks, readings have been taken according to schedule and with no exceedances beyond the limit set forth in Condition 4.1.1.f. of this permit and no individual readings greater than 40% opacity have been taken, subsequent readings may be taken once every month, with each set of readings covering one continuous, six minute period while the boiler is operating. If at any time a set of readings indicates a exceedance of the limit set forth in Condition 4.1.1.f. of this permit or contains an individual reading of greater than 40% opacity, subsequent sets of readings will be taken once every week until a period of four consecutive weeks passes during which readings have been taken according to schedule and no exceedances of the limit set forth in Condition 4.1.1.f. or no individual readings greater than 40% opacity have been observed. Such records shall be maintained in accordance with Condition 3.4.1 of this permit.
- 4.2.4. For the purpose of demonstrating compliance with visible emission limits of 4.1.2.f. of this permit, the permittee shall conduct opacity readings of the emissions from each of the stack for each dryer (Emission Points 3Ea, 3Eb, 3Ec, 3Ed, 4Ea, 4Eb, 4Ec, and 4Ed) by certified persons and in accordance with 40 CFR 60 Method 9. A set of readings will be taken at least once per every three months (quarterly), with each set of readings covering one continuous, 5 minute period while the respective dryer is operating. If, after a period of four consecutive quarters (one year), readings have been taken according to schedule and with no exceedances beyond the limit set forth in Condition 4.1.2.f. of this permit and no individual readings greater than 40% opacity have been taken, subsequent readings may be taken once every year, with each set of readings covering one continuous, five minute period while the boiler is operating. If at any time a set of readings indicates a exceedance of the limit set forth in Condition 4.1.2.f. of this permit or contains an individual reading of greater than 40% opacity,

subsequent sets of readings will be taken once every quarter until a period of four consecutive quarters passes during which readings have been taken according to schedule and no exceedances of the limit set forth in Condition 4.1.2.f. or no individual readings greater than 40% opacity have been observed. Such records shall be maintained in accordance with Condition 3.4.1 of this permit.

- 4.2.5. For the purpose of demonstrating compliance with visible emission limits of 4.1.5.c. of this permit, the permittee shall conduct opacity readings of the emissions from each of the stack for each baghouse vent (Emission Points E10 and E11) by certified persons and in accordance with 40 CFR 60 Method 9. A set of readings will be taken at least once per every three months (quarterly), with each set of readings covering one continuous, 5 minute period while the respective source activity is operating. If, after a period of four consecutive quarters (one year), readings have been taken according to schedule and with no exceedances beyond the limit set forth in Condition 4.1.2.f. of this permit and no individual readings greater than 40% opacity have been taken, subsequent readings may be taken once every year, with each set of readings covering one continuous, five minute period while finishing operations are being engaged. If at any time a set of readings indicates a exceedance of the limit set forth in Condition 4.1.5.c. of this permit or contains an individual reading of greater than 40% opacity, subsequent sets of readings will be taken once every quarter until a period of four consecutive quarters passes during which readings have been taken according to schedule and no exceedances of the limit set forth in Condition 4.1.5.c. or no individual readings greater than 40% opacity have been observed. Such records shall be maintained in accordance with Condition 3.4.1 of this permit.

4.3. Testing Requirements

- 4.3.1. Within twenty-four months after issuance of this permit and every twenty-four months thereafter, the permittee shall conduct emission testing to demonstrate compliance with the permitted PM, CO and NO_x emission limits in 4.1.1.d. for the waste wood boiler (1S) and to verify and/or establish pressure drop operating setting of the multiclone. This testing shall be conducted as outline in 3.3.1., and as follows:
- a. Demonstrating compliance with the particulate matter limit shall be conducted in accordance with U.S. EPA Method 5;
 - b. Demonstrating compliance with the carbon monoxide limits shall be conducted in accordance with U.S. EPA Method 10;
 - c. Demonstrating compliance with the oxides of nitrogen limits shall be conducted in accordance with U.S. EPA Method 7E;
 - d. Demonstrating compliance with the visible emission limit of 4.1.1.f. shall be conducted in accordance with U.S. EPA Method 9;
 - e. The Unit shall be operating within 10% of the maximum hour heat input as permitted in Condition 4.1.1.a.;
 - f. The amount of wood consumed during each test run shall be measured and recorded;
 - g. A sample of the fuel to be consumed during the test shall taken and have this sample analyzed to determine the heat value of the fuel on a dry basis;

- h. The pressure drop across the multiclone shall be measured and recorded in 15 minute intervals during each test run. Given that the unit demonstrate compliance with the PM limit of 4.1.1.d., the permittee shall create a operating range for the multiclone using these measurements;
- i. Such testing shall be conducted and reported as stated in 45CSR2A unless other wise stated in this permit.
- j. Records of such testing shall be maintained in accordance of Condition 3.4.1. of this permit.

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** 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.

4.4.2. **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.

4.4.3. **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.

4.4.4. The permittee shall maintain records documenting the VOC and HAP content of all resins, adhesives, curing agents, fillers, or any material consumed at that is used in the manufacturing process. Such records/documents shall be maintain on site as long as the product or material is currently be used or consumed at the facility. Once a product or material is no longer being used or consumed at the facility, such records shall be maintained in accordance with Condition 3.4.1. of this permit. *

4.4.5. No later than ten calendar days after the end of 36.5 days period, the permittee shall determine the boiler efficiency and heat input of each day and sum these individual days to determine the total heat input to determine the 36.5 day period. The heat input from the previous 10 periods shall be summed together to determine the total heat input of the previous 10 - 36.5 days periods rolling total, which is to be used demonstrate compliance the annual heat input limit listed in condition.4.1.1.b. Such records shall be maintained in accordance with condition 3.4.1. of this permit.

4.5. Reporting Requirements

4.5.1. Any exceedances of the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, 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 exceedances, and any corrective measures taken or planned.

4.5.2. The permittee shall submit the results of testing required in Section 4.3. of this permit before the close of business on the 60th day following the completion of such testing to the Director.

4.5.3. The permittee shall submit a status report of implementing the monitoring plan as required in 4.1.1.i. of this permit to the Director by no later than January 10, 2010. Records of such report shall be maintained in accordance with 3.4.1. of this permit., Such report shall contain but not be limited to the following:

- a. Identifying the specific monitor devices/instruments.
 - (i)The manufacture's specifications and requirements.
 - (ii)Detail drawings identifying the exact location of the measuring devices.
 - (iii)Calibration procedure for the instrument.
 - (iv)How the measured readings are going recorded and stored.

- b. Identify the operation ranges of the monitored parameters for normal and idle operations.
- c. Time schedule for developing and implementing this plan.

4.5.4. Within 30 days after completely implementing the monitoring plan as required in condition 4.1.1.i., the permittee shall notify the Director in writing of such completion and a copy of the written plan itself. In such notification, the permittee note any changes to the plan than what was presented in the May 22, 2009 submittal and in enclosed in the status report as required in condition 4.5.4. of this permit. Records of such notification shall be maintained in accordance with 3.4.1 of this permit.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative

Date

Name and Title

(please print or type)

Name

Title

Telephone No. _____

Fax No. _____

¹

This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.