West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate

Pursuant to

Title V

of the Clean Air Act

Issued to:

Georgia-Pacific Wood Products LLC
Mt. Hope OSB Plant
R30-01900034-2011

John A. Benedict
Director

Issued: June 14, 2011 • Effective: June 28, 2011

Expiration: June 14, 2016 • Renewal Application Due: December 14, 2015

Permit Number: **R30-01900034-2011**
Permittee: **Georgia-Pacific Wood Products LLC**
Facility Name: **Mt. Hope OSB Plant**
Permittee Mailing Address: **79 North Pax Avenue, Mt. Hope, West Virginia 25880**

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

Facility Location:	Mt. Hope, Fayette County, West Virginia
Facility Mailing Address:	79 North Pax Avenue, Mt. Hope, West Virginia 25880
Telephone Number:	304-254-7255
Type of Business Entity:	LLC
Facility Description:	Reconstituted wood products (oriented strandboard manufacturing)
SIC Codes:	2493 (NAICS Code 321219)
UTM Coordinates:	483.5 km Easting • 4,194.5 km Northing • Zone 17

Permit Writer: Denton McDerment

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

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

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

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
5600	5600	Wellons Energy System *Wood waste-fired energy/dryer, providing heat for drying of the wood flakes in the rotary dryers, as well as the Thermal Oil System for the press operation.* OSB Rotary Dryers (3) each with a 15 MMBtu/hr natural gas burner	1995	240 MMBtu/hr 45 OD tons/hr	WES-1 UI-1 ESP
3600	3600	Auxiliary Thermal Oil Heater *Natural gas burner used to heat the thermal oil during times when the Wellons unit is not in operation.*	1995	45 MMBtu/hr	None
6800	6800	Forming Line Dedust System *Form mats from the material from the blenders to be sent to the press operations.*	1995	57.7 MSF/hr	FF2
6900	6900	Mat Trim System *Cross-cut saws trim 24-ft formed mats prior to press operations.*	1995	57.7 MSF/hr	FF3
7890	7890	Board Press *Mats from Former are subjected to heat and pressure, and cured to form OSB.*	2008	57.7 MSF/hr	RTO/RCO
8830/8835	8830/8835	Edge Seal Paint Booth *Paint booth in which a water-based latex paint is applied to finished OSB.*	1995	15 gallons/hr	8830/8835
8900	8900	Finishing Area *Oriented Strand Board trimming operations; tongue and groove operations*	1995	57.7 MSF/hr	FF5
8950	8950	Mat Trim Transfer System/Dry Fuel Silo *Trim material from the Former Area, Mat Trim, and Finishing operations are collected and transferred to the high efficiency cyclone (HEC1) for deposition in the Dry Fuel Silo. Enclosed Dry Fuel Silo contains material collected from the Former Area, Mat Trim, and the Finishing Area.*	1995	57.7 MSF/hr	HEC1
9500	9500	Sanding Area *Sanding operations.*	1995	36 MSF/hr	FF6

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
9600	9600	Sanderdust Transfer System/Sanderdust Silo *Collects dust from sanding operations and pneumatically transfers the dust to the high efficiency cyclone for deposition into the Sander Dust Fuel Silo.*	1995	36 MSF/hr (system) 4,600 ft^3 (silo)	HEC2
8960	8960	Screen Fines Transfer System *Collects fines from the screening operation after the dryers, and pneumatically transfers this material to the fabric filter for deposition into the Dry Fuel Silo.*	1999	7.9 tons/hr	FF7
8970	8970	Screening Building Dedust System *Collects material from the screening operation within the screening building and pneumatically transfers this material to the fabric filter for deposition into the Dry Fuel Silo*	1999	2.7 tons/hr	FF8
2230	2230	Bark Hog *Bark grinder which acts as an integral part of the waste wood system.*	1995	27 tons/hr	None
1050	1050	Log Debarkers *Two (2) ring debarkers used to remove bark from logs.*	1995	90 tons/hr	None
2000	2000	Log Flakers *Two (2) Long Log Flakers are used to flake the debarked logs.*	1995	75 tons/hr	None
3990	3990	Storage Tanks *15,000 gallon storage tank for the Thermal Oil System.*	1995	NA	None
8010	8010	Nail Line Applicator	2000	NA	None
Fugitive	Misc. Coatings	Miscellaneous Coating Operations under PCWP MACT	1995		None
RICE-2 through RICE-8	RICE-2 through RICE-8	Emergency Use – Reciprocating Internal Combustion Engines (RICE)	1995	18 – 41 hp	None
Sources subject to Compliance Plan (permit condition 3.6.1.)					
6000	6000	Blenders	1995	46.5 OD tons/hr	None
Fugitive	Log Deicing	Log Deicing/Conditioning	1995	90 tons/hr	None
RICE-1	RICE-1	Firewater Pump Engine	1995	255 hp	None

OD – "oven dried"
MSF – "thousand square feet"

CONTROL EQUIPMENT

Control Device	Control Device ID	Control Device Description	Year Installed	Em. Unit Controlled
Electrostatic precipitator	ESP	Electrostatic Precipitator controlling particulate matter emissions from the Wellons Energy System.	1995	5600
Fabric Filter	FF2	Fabric filter system controlling the collection of material from the Former Area. Collected material from the Former Area dust collection system enters a cyclone via air stream, with exiting air entering the fabric filter for particulate control. 99.9% control efficiency. This material is then pneumatically transferred to the Dry Fuel Silo.	1995	6800
Fabric Filter	FF3	Fabric filter system controlling the collection of trim material from the cross-cut saws. Collected material enters a cyclone via air stream, with exiting air entering the fabric filter for particulate control. 99.9% control efficiency. This material is then pneumatically transferred to the Dry Fuel Silo.	1995	6900
Fabric Filter	FF5	Fabric filter system controlling the collection of trim material from board trimming operations (Finishing Area). 99.9% control efficiency. This material is then pneumatically transferred the Dry Fuel Silo.	1995	8900
Cyclone	HEC1	High Efficiency Cyclone controlling the transfer of material from the Former Area, Mat Trim, and Finishing Area operations to the Dry Fuel Silo. 99.9% control efficiency.	1995	8950
Fabric Filter	FF6	Fabric filter system controlling the collection of trim material from the sanding operations. 99.9% control efficiency. This material is then transferred to the Sander Dust Fuel Silo.	1995	9500
Cyclone	HEC2	High Efficiency Cyclone controlling the transfer of material from the Sanding Area material collection system to the Sander Dust Fuel Silo. 99.9% control efficiency.	1995	9600
Fabric Filter	FF7	Fabric filter system controlling the collection of screen fines from the screening operations preceding the dryers. 99.9% control efficiency. Material is then pneumatically transferred to the Dry Fuel Silo.	1999	8960
Fabric Filter	FF8	Fabric filter system controlling the collection of screen fines from the screen drums within the screening building. Material is then pneumatically transferred to the Dry Fuel Silo.	1999	8970
Fabric Filter	FF4	Fabric filter controlling the overspray in the listed paint booth.	1995	8830/8835
RTO/RCO		Regenerative oxidizer which can operate in either thermal or catalytic modes. Controls the OSB Press	2008	7890

Control Device	Control Device ID	Control Device Description	Year Installed	Em. Unit Controlled
Wellons Energy System	WES-1	Wellons Energy System *Acts as a control device for pollutants generated in the drying process (i.e., PM, VOC, HAPs).* Note: The fact that WES-1 is considered a control device may not be construed to mean that the WES-1 is not subject to any other rule or regulation that may apply, or become applicable, to WES-1.	1995	OSB Rotary Dryers (3)
Urea injection	UI-1	Urea injection. *The Wellons Energy System is equipped with the Nalco Fuel Tech NO_xOUT® system in which urea is injected into the furnace at specified locations to control NO_x generation.*	1995	Wellons Energy System

1.2. Active R13, R14, and R19 Permits

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

Permit Number	Date of Issuance
R13-1622H	December 14, 2009
R13-2261A	February 23, 2000

2.0 General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments
CBI	Confidential Business Information
CEM	Continuous Emission Monitor
CES	Certified Emission Statement
C.F.R. *or* CFR	Code of Federal Regulations
CO	Carbon Monoxide
C.S.R. *or* CSR	Codes of State Rules
DAQ	Division of Air Quality
DEP	Department of Environmental Protection
FOIA	Freedom of Information Act
HAP	Hazardous Air Pollutant
HON	Hazardous Organic NESHAP
HP	Horsepower
lbs/hr *or* lb/hr	Pounds per Hour
LDAR	Leak Detection and Repair
m	Thousand
MACT	Maximum Achievable Control Technology
mm	Million
mmBtu/hr	Million British Thermal Units per Hour
mmft^3/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour
NA *or* N/A	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAPS	National Emissions Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10μm in diameter
pph	Pounds per Hour
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulate
USEPA	United States Environmental Protection Agency
UTM	Universal Transverse Mercator
VEE	Visual Emissions Evaluation
VOC	Volatile Organic Compounds

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

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

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

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

2.7. Minor Permit Modifications

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

2.8. Significant Permit Modification

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

2.9. Emissions Trading

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

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

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

[45CSR§30-5.9.]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

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

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

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[45CSR§30-5.7.a.]

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

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

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

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

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

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

2.19. Duty to Provide Information

2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

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

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

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

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

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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.
[40 C.F.R. §61.145(b) and 45CSR34]

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. Accidental and other infrequent discharges which cause or contribute to objectionable odors will be considered on an individual basis and shall be reported by the person responsible therefore to the Director in the manner to be prescribed by the Director.
[45CSR§4-4.1. State-Enforceable only.]

3.1.6. When a process or operation results in the discharge of an air pollutant or pollutants which causes or contributes to an objectionable odor, an acceptable control program shall be developed and offered to the Director by the person responsible for the discharge of such air pollutant or pollutants. This control program shall be submitted in the manner prescribed by the Director and within such time as shall be fixed by the Director. If such a control program has been approved by the Director by the issuance of a variance, the person responsible for said discharge shall not be considered to be in violation of 45CSR6 in connection with said discharge so long as the program is observed.
[45CSR§4-6.1. State-Enforceable only.]

3.1.7. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity.
[45CSR§7-3.1.; 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.1.8. No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7.
[45CSR§7-4.1.; 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.1.9. No person shall cause, suffer, allow, or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1.; 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.1.10. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2.; 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.1.11. In order to minimize the generation of fugitive dust emissions from plant roadways, the permittee shall pave all plant roadways and sweep said roadways as necessary. The permittee shall take care to ensure that all vehicles and equipment observe the posted 10 mph speed limit referenced in Permit Application number R13-1622. In order to minimize the generation of fugitive particulate emissions from conveyors, the permittee shall fully enclose all conveyors except the conveyor that transfers bark from the debarkers to the bark storage pile referenced in Permit Application number R13-1622.
[45CSR13, Permit No. R13-1622 (Conditions 4.1.3. and 4.1.4.)]

3.1.12. Due to unavoidable malfunction of equipment, emissions exceeding those provided for in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner and approved by the Director.
[45CSR§7-9.1.; 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.1.13. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]

3.1.14. In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations, either in whole or in part, authorized by R13-2261A or R13-1622H, the permittee shall notify the Director, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.
[45CSR13, Permit No. 2261 (Condition C.5.) and Permit No. 1622 (Condition 2.14.)]

3.1.15. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.16. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.17. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.18. a. The Wellons Energy System including Thermal Oil Heater (Em. Pt. ID 5600), and Natural Gas-Fired Auxiliary Thermal Oil Heater (Em. Pt. ID 3600), shall comply with all applicable requirements for existing affected sources pursuant to 40 C.F.R. 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters*" no later than the existing source effective date. The permittee is required to submit an Initial Notification no later than 120 calendar days after becoming subject to the rule in accordance with 40 C.F.R. §63.7545(b).

These dates may be subject to change if the permittee is granted an extension pursuant to the provisions of 40 C.F.R. 63, the compliance date is amended by USEPA, or if §112(j) of the 1990 Clean Air Act Amendments becomes applicable.

[40 C.F.R. 63 Subpart DDDDD; 45CSR34]

b. If required to submit a Notification of Compliance Status (NOCS) pursuant to 40 C.F.R. 63, Subpart DDDDD, the permittee shall also submit a complete application for significant modification to the Title V permit to incorporate the specific requirements of the rule no later than the maximum time allowed for the NOCS submittal in 40 C.F.R. §63.7545(e).

If requested, this Title V permitting deadline may be changed upon written approval by the Director. The permittee shall request the change in writing at least 30 days prior to the application due date.

[45CSR§30-6.5.b.]

3.1.19. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 C.F.R. 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the

routine control device maintenance exemption specified in 40 C.F.R. §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. The permittee must always operate and maintain its affected source, including air pollution control and monitoring equipment, according to the provisions in 40 C.F.R. §63.6(e)(1)(i).
[40 C.F.R. §§ 63.2250(a) and (b); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coating Operations)*

3.1.20. **Startup, Shutdown, Malfunction Plan (SSMP).** The permittee must develop a written SSMP according to the provisions in 40 C.F.R. §63.6(e)(3).
[40 C.F.R. §63.2250(c); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coating Operations)*

3.1.21. **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 1.1 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR13, Permit No. R13-1622 (Condition 4.1.15.); 45CSR§13-5.11]

3.1.22. When emissions on an annual basis of one or more of the greenhouse gases listed below are greater than the *de minimis* amounts listed below, all greenhouse gases emitted above the *de minimis* amounts shall be reported to the Secretary under 45CSR§42-4. (see Section 3.5.):

Greenhouse Gas Compound	tons/year
carbon dioxide	10,000
methane	476
nitrous oxide	32.6
hydrofluorocarbons	0.855
perfluorocarbons	1.09
sulfur hexafluoride	0.42

[45CSR§42-3.1., State-Enforceable only.]

3.2. Monitoring Requirements

3.2.1. At least weekly, visual emission checks of each emission point subject to an opacity limit, excluding the Wellons Energy System and the Board Press which have specific requirements in their respective sections, shall be conducted. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible

emission condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions. A record of each visible emission check shall be maintained on site. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c.]

3.2.2. **Continuous Parameter Monitoring System (CPMS).**

(a) *General continuous parameter monitoring requirements.* The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of this permit condition.

(1) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.

(2) At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(3) Record the results of each inspection, calibration, and validation check.

(b) *Temperature monitoring.* For each temperature monitoring device, the permittee must meet the requirements in paragraphs (a) and (b)(1) through (6) of this permit condition.

(1) Locate the temperature sensor in a position that provides a representative temperature.

(2) Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger.

(3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.

(4) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading.

(5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

(6) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

[40 C.F.R. §§63.2269(a) and (b); 45CSR34; 40 C.F.R. §§64.3(b)(1), 64.3(b)(3), 64.3(b)(4), 64.7(b); 45CSR§30-5.1.c.; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System; Board Press/RCO)*

3.2.3. **Monitoring and Data Collection to Demonstrate Continuous Compliance**

(a) The permittee must monitor and collect data according to 40 C.F.R. §63.2270.

(b) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.

(c) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system.

(d) The permittee must determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (b) and (c) of this permit condition).

(f) To calculate the data averages for each 3-hour or 24-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.*, not from periods described in paragraphs (b) and (c) of this permit condition).

[40 C.F.R. §§63.2270(a), (b), (c), (d) and (f); 45CSR34; 40 C.F.R. §§64.3(b)(4), 64.7(c); 45CSR§30-5.1.c.; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System; Board Press/RCO)*

3.2.4. **Commencement of Operation**. The permittee shall conduct the monitoring under 40 C.F.R. Part 64 upon issuance of this permit that includes such monitoring.
[40 C.F.R. §64.7(a); 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.2.5. **Response to Excursions or Exceedances.**

(1) Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable**.**

(2) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 C.F.R. §64.7(d); 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.2.6. **Documentation of Need for Improved Monitoring**. After approval of monitoring under 40 C.F.R. Part 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the

existing indicator ranges or designated conditions, the permittee shall promptly notify the Director and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[40 C.F.R. §64.7(e); 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.2.7. **Quality Improvement Plan (QIP).** Based on the results of a determination made under 40 C.F.R. §64.7(d)(2) (Response to excursions or exceedances, permit condition 3.2.5.(2)), the Administrator or Director may require the permittee to develop and implement a QIP. Consistent with 40 C.F.R. §64.6(c)(3), the permittee is limited to an accumulation of exceedances or excursions no greater than 5% of Board Press or Rotary Dryers operating time during a reporting period, prior to requiring the implementation of a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §64.8(b) through (e). Refer to permit condition 3.5.14.(2)c. for the reporting required when a QIP is implemented.
[40 C.F.R. §64.8; 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.3. Testing Requirements

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

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within 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.

3. A statement of compliance or non-compliance with each permit or rule condition.

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

3.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR§7-8.2 and 45CSR13, Permit No. R13-2261 (Condition B.3.)]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, Permit No. R13-1622 (Condition 4.3.1.)]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.4.4. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. The permittee shall also inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken.
[45CSR§30-5.1.c.]

3.4.5. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.1, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, Permit No. R13-1622 (Condition 4.3.2.)]

3.4.6. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, Permit No. R13-1622 (Condition 4.3.3.)]

3.4.7. **Recordkeeping for 40 C.F.R. 63 Subpart DDDD.**

(a) The permittee must keep the records listed in paragraphs (a)(1) through (4) of this condition.

(1) A copy of each notification and report that the permittee submitted to comply with 40 C.F.R. 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in 40 C.F.R. §63.10(b)(2)(xiv).

(2) The records in 40 C.F.R. §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Documentation of the permittee's approved routine control device maintenance exemption, if the permittee requests such an exemption under 40 C.F.R. §63.2251.

(4) Records of performance tests and performance evaluations as required in 40 C.F.R. §63.10(b)(2)(viii).

(b) The permittee must keep the records required in Tables 7 and 8 to 40 C.F.R. 63 Subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies to the permittee. Refer to conditions 5.2.6. and 7.3.2.

(c) The permittee must keep records of annual catalyst activity checks and subsequent corrective actions for the RTO/RCO.

[40 C.F.R. §§63.2282(a), (b), and (e); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System Board Press/RCO; Group 1 Miscellaneous Coating Operations*)

3.4.8. **Format and Retention of Records for 40 C.F.R. 63 Subpart DDDD.**

(a) Records must be in a form suitable and readily available for expeditious review as specified in 40 C.F.R. §63.10(b)(1).

(b) As specified in 40 C.F.R. §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 C.F.R. §63.10(b)(1). The permittee can keep the records offsite for the remaining 3 years.

[40 C.F.R. §§63.2283(a), (b), and (c); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Flake Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coating Operations*)

3.4.9. **General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)**
The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 (QIP condition 3.2.7.) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
[40 C.F.R. §64.9(b); 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:	**If to the US EPA:**
Director WVDEP Division of Air Quality 601 57th Street SE Charleston, WV 25304 Phone: 304/926-0475 FAX: 304/926-0478	Associate Director Office of Enforcement and Permits Review (3AP12) U. S. Environmental Protection Agency Region III 1650 Arch Street Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.5.10. The permittee must notify the EPA Administrator within 30 days before taking any of the actions specified in paragraphs (a) and (b) below.

a. The permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements in 40 C.F.R. 63 Subpart DDDD.

b. The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

[40 C.F.R. §§63.2280(g)(1) and (g)(3); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)]
(*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.5.11. **40 C.F.R. 63 Subpart DDDD Compliance Report Contents.** The permittee must submit a compliance report containing the information in 40 C.F.R. §§63.2281(c) through (g), which are:

a. The information in 40 C.F.R. §§62.2281(c)(1) through (8).

b. For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to 40 C.F.R. 63 Subpart DDDD that occurs at an affected source where the permittee is not using a Continuous Monitoring System (CMS) to comply with the compliance options, operating requirements, or work practice requirements in 40 C.F.R. 63 Subpart DDDD, the compliance report must contain the information in paragraphs 40 C.F.R. §§62.2281(c)(1) through (6) and in 40 C.F.R. §§62.2281(d)(1) and (2) (3.5.11.b.(1) and (2) of this permit). This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

(1) The total operating time of each affected source during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

Note: Condition 3.5.11.b. applies only to the Group 1 Miscellaneous Coatings group.

c. For each deviation from a compliance option or operating requirement occurring at an affected source where the permittee is using a CMS to comply with the compliance options and operating requirements in 40 C.F.R. 63 Subpart DDDD, the permittee must include the information in 40 C.F.R. §§62.2281(c)(1) through (6) and 40 C.F.R. §§62.2281(e)(1) through (11) (3.5.11.c.(1) through (11) of this permit). This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

(1) The date and time that each malfunction started and stopped.

(2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

(3) The date, time, and duration that each CMS was out-of-control, including the information in 40 C.F.R. §63.8(c)(8).

(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in your approved routine control device maintenance exemption; or during another period.

(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.

(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.

(7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.

(8) A brief description of the process units.

(9) A brief description of the CMS.

(10) The date of the latest CMS certification or audit.

(11) A description of any changes in CMS, processes, or controls since the last reporting period.

d. The permittee must report all deviations as defined in 40 C.F.R. 63 Subpart DDDD in the semiannual monitoring report required by condition 3.5.6. If an affected source submits a compliance report pursuant to Table 9 to 40 C.F.R. 63 Subpart DDDD along with, or as part of, the semiannual monitoring report required by condition 3.5.6., and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in 40 C.F.R. 63 Subpart DDDD , submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the WV DAQ.

[40 C.F.R. §§63.2281(a), (c), (d), (e), and (g), and §63.2271(b); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coatings*)

3.5.12. **40 C.F.R. 63 Subpart DDDD Compliance Report Submittal.** The permittee must submit the report semiannually according to the requirements in 40 C.F.R. §63.2281(b), which are:

a. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

b. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively.

c. The permittee may submit the subsequent compliance reports according to the dates the permitting authority has established in condition 3.5.6. instead of according to the dates in paragraph "b." of this permit condition.

[40 C.F.R. §§63.2281(b); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coatings*)

3.5.13. **40 C.F.R. 63 Subpart DDDD Immediate SSM Report.** The permittee must submit an immediate startup, shutdown, and malfunction report if the permittee had a startup, shutdown, or malfunction during the reporting period that is not consistent with the SSMP.

a. Actions taken for the event by fax or telephone within 2 working days after starting actions inconsistent with the plan.

b. The information in 40 C.F.R. §63.10(d)(5)(ii) by letter within 7 working days after the end of the event unless the permittee has made alternative arrangements with the permitting authority (i.e., WV DAQ).

[40 C.F.R. §§63.2281(a); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*Rotary Dryers/Wellons Energy System; Board Press/RCO; Group 1 Miscellaneous Coatings*)

3.5.14. **General Reporting Requirements for 40 C.F.R. Part 64 (CAM)**

(1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. 64, the permittee shall submit CAM monitoring reports with the quarterly excess emissions reports. A copy of the CAM monitoring reports generated within the semi-annual monitoring report period shall be included with the semi-annual monitoring report under permit condition 3.5.6. Incorporation by reference within the semi-annual monitoring report is not acceptable.

(2) A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:

a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

c. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. §64.9(a); 45CSR§30-5.1.c.] (*Rotary Dryers/Wellons Energy System; Board Press/RCO*)

3.5.15. **Greenhouse Gas Reporting Requirements**. When applicable, as determined in permit section 3.1., greenhouse gas emissions shall be reported pursuant to 45CSR§42-4. as follows:

a. In accordance with a reporting cycle provided by the Secretary, affected sources shall report to the Secretary the quantity of all greenhouse gases emitted above *de minimis* amounts in the years specified by the Secretary.
[45CSR§42-4.1., State-Enforceable only.]

b. Affected sources shall only be required to report annual quantities of anthropogenic non-mobile source greenhouse gases emitted at the stationary source, and shall not be required to report biogenic emissions of greenhouse gases.
[45CSR§42-4.2., State-Enforceable only.]

c. Reports of greenhouse gas emissions submitted to the Secretary under 45CSR§42-4. shall be signed by a responsible official and shall include the following certification statement: "I, the undersigned, hereby certify that the data transmitted to the West Virginia Department of Environmental Protection is true, accurate, and complete, based upon information and belief formed after reasonable inquiry.
[45CSR§42-4.5., State-Enforceable only.]

3.6. Compliance Plan

3.6.1. Within sixty (60) days of the effective date of this permit, the permittee shall submit to the Director a complete "Application for NSR Permit and Title V Permit Revision" to permit the sources in Table 3.6.1. below.

Table 3.6.1.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity
6000	6000	Blenders	1995	46.5 OD tons/hr
Fugitive	Log Deicing	Log Deicing/Conditioning	1995	90 tons/hr
RICE-1	RICE-1	Firewater Pump Engine	1995	255 hp

[45CSR§30-5.3.c.]

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. **40 C.F.R. 63, Subpart H -** ***National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks***. Georgia-Pacific's Mt. Hope Facility does not have a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAPs.

b. **40 C.F.R. 63, Subpart JJ -** ***National Emission Standards for Wood Furniture Manufacturing Operations***. Georgia-Pacific's Mt. Hope Facility is not engaged in the manufacture of wood furniture or wood furniture components. Since the facility does not meet the applicability criteria in 40 C.F.R. §63.800(a), this regulation does not apply.

c. **45CSR17 -** ***To Prevent and Control Prticulate Air Pollution from Material Handling, Preparation, Storage and Sources of Fugitive Particulate Matter***. Georgia-Pacific is subject to the fugitive particulate matter emission requirements of 45CSR2 and 45CSR7; therefore, they are exempt from the provisions of this rule.

d. **45CSR20 -** ***Good Engineering Practice as Applicable to Stack Heights***. Georgia-Pacific's Mt. Hope Facility has no stacks at the regulated heights.

e. **45CSR21 -** ***Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds***. Georgia-Pacific's Mt. Hope Facility is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties.

f. **40 C.F.R. 60, Subpart Kb** - ***Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984***. The Thermal Oil Storage Tank is exempt from the General Provisions (Subpart A) and the major provisions of this subpart because it has a design capacity less than 75 m^3.

g. **40 C.F.R. 60, Subpart Db** - ***Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units***. The issue of 40 C.F.R. 60, Subpart Db, applicability (to the Wellons unit) was the subject of an administrative appeal filed before the Air Quality Board (Appeal No. 93-06-P). This appeal was resolved by a negotiated settlement, resulting in the entry of the Agreed Order by the Board on June 12, 1997. Although the parties to the appeal agreed that NSPS Subpart Db did not specifically apply to this particular source, the terms and conditions in existing Permit No. R13-1622B substantially incorporates the requirements of NSPS Subpart Db.

h. **40 C.F.R. 63, Subpart E** - ***National Emission Standard for Mercury***. The provisions of this subpart are applicable to stationary sources to ... incinerate or dry wastewater treatment plant sludge. The facility incinerates wastewater treatment plant effluent that contains sludge. However, the facility is not involved in mercury processing nor does it have any processes that use mercury. The wastewater effluent and sludge generated at the facility should not contain any significant concentrations of mercury.

i. **40 C.F.R. 60 Subpart IIII—*Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*.** This rule does not apply to the compression ignition RICE-1 since it was constructed before July 11, 2005 (cf. applicability criteria at §60.4200(a)(2)). The rule does not apply to any of the RICE-2 through RICE-8 since they are spark ignition type.

j. **40 C.F.R. 60 Subpart JJJJ—*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*.** This rule does not apply to any of the RICE-2 through RICE-8 since they were constructed prior to all of the dates specified in §§60.4230(a)(1) through (5). The rule does not apply to RICE-1 since it is compression ignition type.

k. **Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.** The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

l. **40 C.F.R. Part 64—*Compliance Assurance Monitoring (CAM)*.** This rule has been applied to permitted sources and incorporated into Title V permit R30-01900034-2006 (SM01) during its term. Therefore no further application of this rule is required for permitted source at this renewal. Further, based on information provided in the renewal application, this rule does not apply to the sources listed in the table below.

Blenders (Em. Unit ID# 6000). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source becomes subject to a pollutant limitation in the future, or be required to use a control device, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. The potential emissions of the HAP methanol is greater than 10-tpy, making it a major source of HAP. However, since there is no emission limit for this pollutant at the time of this renewal, the criterion at §64.2(a)(1) is not met for Methanol. Therefore, the Blenders are not subject to CAM.
Log Deicing/Conditioning (fugitive). This rule does not apply to this source since it does not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the

source(s) become subject to a pollutant limitation in the future, or may be required to use a control device or method, the potential emissions of regulated air pollutants emitted from the source are less than 100 tons per year. Also, the potential emissions of each HAP and aggregate HAPs are less than 10-tpy and 25-tpy, respectively. Therefore, the Log Deicing/Conditioning source is not subject to CAM.
Miscellaneous Coating Operations under PCWP MACT (fugitive). This rule does not apply to these sources since they do not meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal.
Emergency Use Reciprocating Internal Combustion Engines (Em. Unit ID# RICE-1 through RICE-8). This rule does not apply to any of the RICE-1 through RICE-8 since none of them meet the applicability criteria of 40 C.F.R. §§64.2(a)(1) through (3) at the time of renewal. Even if the source(s) become subject to a pollutant limitation in the future, or may be required to use a control device, the potential emissions of regulated air pollutants emitted from these sources are less than 100 tons per year. Therefore, RICE-1 through RICE-8 are not subject to CAM. Since the RICEs are subject to 40 C.F.R. 63 Subpart ZZZZ, the exemption at §64.2(b)(1)(i) is met for HAPs emitted from the RICEs.

4.0 Auxiliary Thermal Oil Heater (Em. Pt. ID 3600)

4.1. Limitations and Standards

4.1.1. No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1.]

4.1.2. No person shall cause, suffer, or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

For Type 'b' fuel burning units, the product of 0.09 and the total design heat inputs for such units in million B.T.U.'s per hour, provided however that no more than six hundred (600) pounds per hour of particulate matter shall be discharged into the open air from all such units. Based on the design heat input of the Auxiliary Thermal Oil Heater (45 MM BTU/hr); the corresponding allowable particulate matter emission rate is 4.05 lb/hr.

[45CSR§§2-4.1. and 4.1.b.]

4.1.3. The addition of sulfur oxides to a combustion unit exit gas stream for the purpose of improving emissions control equipment efficiency shall be reviewed by the Director. No person shall cause, suffer, allow or permit the addition of sulfur oxides as described above unless written approval for such addition is provided by the Director.
[45CSR§2-4.4.]

4.1.4. At all times, including periods of start-ups, shutdowns, and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
[45CSR§2-9.2.]

4.1.5. No person shall cause, suffer, allow, or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:

For Type 'b' and Type 'c' fuel burning units, the product of 3.2 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour. With a maximum design heat input of 45 MM Btu/hr, the allowable emission rate of SO_2 is 144 lbs/hr for the Auxiliary Thermal Oil Heater.

[45CSR§10-3.3.f.]

4.1.6. Natural gas-fired oil heaters are to be used for auxiliary purposes only. Natural gas shall not be used during normal operating conditions of the Wellons Energy Unit.
[45CSR13, Permit No. R13-1622 (Condition 4.1.7.)]

4.2. Monitoring Requirements

4.2.1. At the request of the Director the owner and/or operator of a source shall install such stack gas monitoring devices as the Director deems necessary to determine compliance with the SO_2 provisions of 45CSR10. The data from such devices shall be readily available at the source location or such other reasonable location that the Director may specify. At the request of the Director, or his or her duly authorized representative, such data shall be made available for inspection or copying. Failure to promptly provide such data shall constitute a violation of 45CSR10.
[45CSR§10-8.2.a.]

4.2.2. Compliance with the visible emission requirements of 4.1.1 of this permit shall be determined in accordance with 40 CFR 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Director.
[45CSR§2-3.2.]

4.3. Testing Requirements

4.3.1. At such reasonable times as the Director may designate, the owner or operator of any fuel burning unit may be required to conduct or have conducted tests to determine compliance such unit with the emission limitations of section 4.1.2 of this permit. Such tests shall be conducted in accordance with the appropriate method set forth in the Appendix to this rule or other equivalent EPA approved method approved by the Director. The Director, or his duly authorized representative, may at his option witness or conduct such tests. Should the Director exercise his option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports located in such manner as the Director 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.
[45CSR§2-8.1.b.]

4.4. Recordkeeping Requirements

4.4.1. The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified. For fuel burning unit(s) which burn only pipeline quality natural gas, such records shall include, but not be limited to, the date and time of start-up and shutdown, and the quantity of fuel consumed on a monthly basis.
[45CSR§2-8.3.c. and 45CSR§2A-7.1.a.]

4.4.2. Compliance with the emissions limitations established in 4.1.2 and 4.1.5 for the Auxiliary Thermal Oil Heater (3600) shall be demonstrated as follows:

a. Demonstrate that natural gas was used as the only fuel.

b. Continual compliance shall be demonstrated by maintaining records of fuel usage for each calendar month:

i. Volume of natural gas combusted; and
ii. Hours of operation.

[45CSR§30-5.1.c.; 40 C.F.R. §60.48c(g)(2); 45CSR16]

4.4.3. For the purpose of determining compliance with 4.1.6., the facility shall maintain monthly certified records using the sample record keeping form originally appended to permit R13-1622C as Attachment A (Title V Permit Attachment D). Alternatively the permittee may propose to the Director a different form of record keeping from that appended as Title V Permit Attachment D. All records are to be initialed by the "Responsible Official", using the space provided in Title V Permit Attachment D, within ten (10) days after the end of each calendar month. The CERTIFICATION OF DATA ACCURACY, appearing in Title V Permit Attachment A, must be completed by a "Responsible Official" within fifteen (15) days after the end of each calendar year. In the event the permittee should substitute its own record keeping form for Title V Permit Attachment D, the CERTIFICATION OF DATA ACCURACY must be copied to the reverse side and properly completed within the time frame referenced above. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
[45CSR13, Permit R13-1622 (Condition 4.3.5.)]

4.5. Reporting Requirements

4.5.1. The owner or operator of a fuel burning unit(s) subject to this rule [45CSR2] shall report to the Director any malfunction of such unit or its air pollution control equipment which results in any excess particulate matter emission rate or excess opacity (i.e., emissions exceeding the standards in sections 4.1.1 and 4.1.2) as provided in one of the following subdivisions:

a. Excess opacity periods meeting the following conditions may be reported on a quarterly basis unless otherwise required by the Director:
   i. The excess opacity period does not exceed thirty (30) minutes within any 24-hour period; and
   ii. Excess opacity does not exceed 40%.

b. The owner or operator shall report to the Director any malfunction resulting in excess particulate matter or excess opacity, not meeting the criteria set forth in subdivision resulting in excess particulate 4.5.1.a. by telephone, telefax, or e-mail by the end of the next business day after becoming aware of such condition. The owner or operator shall file a certified written report concerning the malfunction with the Director within thirty (30) days providing the following information.
   i. A detailed explanation of the factors involved or causes of the malfunction;
   ii. The date and time of duration (with starting and ending times) of the period of excess emissions;
   iii. An estimate of the mass of excess emissions discharged during the malfunction period;
   iv. The maximum opacity measured or observed during the malfunction;
   v. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction; and
   vi. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.

[45CSR§2-9.3]

4.6. Compliance Plan

4.6.1. Reserved.

5.0 Wellons Energy System (Em. Pt. ID 5600)

5.1. Limitations and Standards

5.1.1. Particulate matter emissions from the Wellons (5600) shall not exceed 0.10 lb/MM BTU, and the opacity shall not exceed 20%, as set forth in 45CSR§7-3.1, except as noted in 45CSR§§7-3.2 through 3.7.
[45CSR§7-3.1, 45CSR13, Permit No. R13-1622 (Conditions 4.1.11. and 4.1.11.1.)]

5.1.2. The particulate matter emission and opacity standard set forth in subsection 5.1.1. (above), shall apply at all times except during periods of startup, shutdown, or malfunction.
[45CSR13, Permit No. R13-1622 (Condition 4.1.11.1.1.)]

5.1.3. The permitted facility shall burn only wood waste as the primary fuel in the Wellons Energy System (emission point 5600). Alternative fuels[1] may be used only after receiving prior written approval from the Director of the Division of Air Quality.
[45CSR13, Permit No. R13-1622 (Condition 4.1.5.)]

5.1.4. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in subdivision 4.1.a through 4.1.e, which are not applicable in this case.
[45CSR§10-4.1]

5.1.5. Air pollutant emissions from the emission point, Wellons (5600), serving the Wellons wood-waste fired energy system, shall not exceed any of the following limitations.

Pollutant	Emission Limit (lbs/hr)
CO	48
NO_x	50[2]
PM (filterable fraction only)	24
SO_2	4.8
VOC* (as carbon)	3.00
Formaldehyde	1.00

*VOC emissions include formaldehyde.

[45CSR13, Permit No. R13-1622 (Condition 4.1.1.)]

5.1.6. A urea injection system shall be installed on the Wellons (5600) for the purpose of reducing NOx emissions, and shall be operated in a manner that ensures that the NOx emissions from the Wellons Energy System do not exceed the emission limit established in 5.1.5.
[45CSR13, Permit No. R13-1622 (Condition 4.1.10.) *and* 45CSR§30-12.7]

1 Excludes the process-related residuals allowed by subsection 5.1.7.
2 Also CAM regulated pollutant.

5.1.7. The permittee may utilize the process of combustion within the Wellons (5600) for disposal of the following specified process-related residuals, only after blending such residuals with dry fuel from the dry fuel silo:

a. Waste water and waste water sludge
b. Paint solids
c. Wax and resin residuals
d. Oil and oil contaminated materials (e.g., sawdust, rags, etc.)
e. Other wood wastes (e.g., bark, trimmings, sawdust, etc.)

[45CSR13, Permit No. R13-1622 (Condition 4.1.6.)]

5.1.8. The permittee must use an emissions control system and demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 to 40 C.F.R. 63 Subpart DDDD, which are:

a. Meet at least one of the following conditions:

i. Wellons Energy System shall reduce emissions of total HAPs, measured as THC (as carbon) by at least 90%.

ii. Emissions of total HAPs from Wellons Energy System measured as THC (as carbon) shall not exceed 20 ppmvd.

iii. Wellons Energy System shall reduce emissions of methanol, by at least 90%.

iv. Emissions of methanol from Wellons Energy System shall not exceed 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd.

v. Wellons Energy System shall reduce emissions of formaldehyde, by at least 90%.

vi. Emissions of formaldehyde from Wellons Energy System shall not exceed 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

b. Table 2 - (1) Thermal Oxidizer (i.e., Wellons Energy System): Maintain the 3-hour block average firebox temperature above the minimum temperature of 1,300°F established during the performance test.

i. The permittee may establish a different minimum firebox temperature for the Wellons Energy System by submitting the notification specified in 40 C.F.R. §63.2280(g) (permit condition 3.5.10.b.) and conducting a repeat performance test as specified in paragraph 40 C.F.R. §63.2262(k)(1) that demonstrates compliance with the applicable compliance options of 40 C.F.R. 63 Subpart DDDD.

[40 C.F.R. §§ 63.2240(b) and 63.2262(k)(2); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)]

5.2. Monitoring Requirements

5.2.1. The owner or operator of the facility shall comply with the following provisions applicable to the Wellons Unit (emission point 5600).

a. The permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere from Emission Point 5600 and record the output of the system. Said continuous monitoring system shall meet the requirements of Performance Specification 1 found in 40 CFR 60 Appendix B in existence at the time of installation, replacement or refurbishment of the COM.

b. Unless otherwise approved by the Director, the following procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero opacity condition and an upscale (span) opacity condition using a certified neutral density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photo detector assembly.

c. Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements.

d. All continuous monitoring systems for measuring opacity of emissions shall complete a minimum of one cycle of sampling and analyzing for each successive 15-second period.

[45CSR13, Permit No. R13-1622 (Conditions 4.3.4., 4.3.4.1., 4.3.4.5., 4.3.4.6., 4.3.4.7., and 4.3.7)] *(This requirement satisfactorily meets a condition of the Compliance Assurance Monitoring Plan for the Wellons Energy System.*)

5.2.2. During periods when the Wellons is operating, the permittee shall monitor and record the following parameters for the Wellons (5600). Unless different ranges for the parameters are established through testing under 5.3.1. and 5.3.2. below, which demonstrate compliance with the emission limitations stated in 5.1.5., said parameters shall be maintained within the design specifications indicated. If new parameter ranges are established through testing, the permit must be revised to reflect the new ranges which will be relied on to demonstrate compliance with the limitations.

5.2.2.1. Carbon Monoxide and Nitrogen Oxide

a. The permittee shall monitor the master operating temperature of the Wellons (5600) unit, and the 12-hour average of data recorded at least every 15 minutes while the unit is operating is to be maintained within the range of 1,300 to 1,800°F.

b. The indicator range is a controlling temperature greater than 1400°F averaged over a 12-hour period. Temperature measurements will be documented at least 15 minutes.

5.2.2.2. Particulate Matter

a. The 12-hour average secondary voltages on any two (2) of the three (3) ESP fields shall be maintained at or above 20 kilovolts.

b. The 12-hour average secondary current on any two (2) of the three (3) ESP fields shall be maintained at or above 100 milliamps.

c. Monitored parameters will be averaged and recorded once every 12 hours the unit is operating. The 12-hour average secondary voltages and currents will be computed from data recorded at least every 15 minutes.

[45CSR§30-5.1.c. *and* 40 C.F.R. §§ 64.3(a)(3) & (b)(4)]

5.2.3. If the 12-hour average controlling temperature falls below 1,400°F, the dryers shall be shutdown until the temperature excursion can be corrected.
[40 C.F.R. §64.7(d); 45CSR§30-5.1.c.]

5.2.4. A continuous emissions monitoring (CEM) system shall be used to measure the NO_x (ppmv) and CO_2 concentration levels (%) in the exhaust stream. These values shall be used to calculate the NO_x lb/MMBtu. The indicator range averages the concentration levels over a 12-hour period.
[40 C.F.R. §64.3(d)(1); 45CSR§30-5.1.c.]

5.2.5. The deviation limit is 0.21 lb NOx/MMBtu on a 12-hour average, except during periods of startup or shutdown.
[40 C.F.R. §64.3(a)(3)(i); 45CSR§30-5.1.c.]

5.2.6. For the Rotary Dryers/Wellons Energy System, the permittee must demonstrate continuous compliance with the compliance options (permit condition 5.1.8.a.), and operating requirements (permit condition 5.1.8.b.) according to the methods specified in Table 7 to 40 C.F.R. 63 Subpart DDDD, which are:

a. Collecting and recording the operating parameter monitoring system data (i.e., firebox temperature) listed in Table 2 to 40 C.F.R. 63 Subpart DDDD for the process unit according to 40 C.F.R. §63.2269(a) through (b) (permit condition 3.2.2.) and 40 C.F.R. §63.2270 (permit condition 3.2.3.); and

b. Reducing the operating parameter monitoring system data (i.e., firebox temperature) to the specified averages in units of the applicable requirement according to calculations in 40 C.F.R. §63.2270 (permit condition 3.2.3.); and

c. Maintaining the average operating parameter (i.e., firebox temperature) at or above the minimum established (specified in permit condition 5.1.8.b.) according to 40 C.F.R. §63.2262.

[40 C.F.R. §63.2271(a); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)]

5.3. Testing Requirements

5.3.1. The owner or operator of the facility shall comply with the following provisions applicable to the Wellons Unit (emission point 5600).

a. Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the Wellons Unit.

b. The owner or operator of the facility shall provide, or cause to be provided, performance testing facilities as follows:

i. Sampling ports adequate for test methods applicable to such facility. This includes constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and providing a stack or duct free of cyclonic flow during performance tests.
ii. Safe sampling platform(s).
iii. Safe access to sampling platform(s).
iv. Utilities for sampling and testing equipment.

c. Emissions in excess of the limits stated in 5.1.5., 5.1.1., and 5.1.2. during periods of startup, shutdown, and malfunction shall not be considered a violation.

d. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

[45CSR13, Permit No. R13-1622 (Condition 4.2.1.)]

5.3.2. At such other times as may be required by the Administrator or the Director, the permittee shall conduct a performance test to demonstrate compliance with the emission rates for Emission Point 5600 listed in 5.1.5. of this permit. The test methods to be utilized are as follows:

Pollutant	Test Method
CO	EPA Method 10
NO_x	EPA Method 7, 7A,7B, 7C, or 7D
PM	EPA Method 5
VOC	EPA Method 25 or 25A
SO_2	EPA Method 6, 6A
Formaldehyde	EPA Method 0011, 320 or as Approved by the Director

The test methods specified for CO, NOx, PM, SO_2, VOC and are found in 40CFR60 Appendix A. Alternate test schedules and/or test methods may be utilized if approval is granted by the Director upon written request of the permittee.

[45CSR13, Permit R13-1622 (Condition 4.2.2.)]

5.3.3. The owner or operator of fuel burning unit(s), manufacturing process source(s) or combustion source(s) shall demonstrate compliance with sections 3, 4, and 5 of 45CSR10 by testing and/or monitoring in accordance with one or more of the following systems (CEMS) or fuel sampling and analysis as set forth in an approved monitoring plan for each emission unit. (See Attachment B, SO_2 Monitoring Plan for the Wellons Energy System.)
[45CSR§10-8.2.c.] ***The SO_2 Monitoring Plan for the Wellons Energy System can be found after Attachment B.***

5.3.4. **QA/QC Practices**

a. Continuous Opacity Monitor - Electrostatic Precipitator
   i. Daily zero and span checks are to be performed on the continuous opacity monitoring (COM) system.
   ii. Calibration and maintenance on the COM system shall be performed quarterly.
   iii. The monitoring device shall be accurate to within one of the following:
      - ± 2% of reading; or
      - ± 5% over its operating range.

b. Continuous Emissions Monitor - Urea Injection System
   i. Daily zero and span checks are to be performed on the continuous emissions monitoring (CEM) system.
   ii. Calibration and maintenance on the CEM system shall be performed quarterly.
   iii. The monitoring device shall be accurate to within one of the following:
      - ± 2% of reading; or
      - ± 5% over its operating range.

c. Master Operating Temperature of the Wellons or the blend chamber temperature - VOC and Formaldehyde: Multiple temperature probes are to be utilized to ensure accurate readings. Temperature probes shall be replaced as necessary.

[40 C.F.R. § 64.3(b)(3); 45CSR§30-5.1.c.]

5.4. Recordkeeping Requirements

5.4.1. Notification and recordkeeping requirements for the purpose of demonstrating compliance with the emission limits for the Wellons (5600) shall be as follows:

a. For the purpose of determining compliance with the maximum emission rate limit stated in condition 5.1.8.a., the permittee shall record and maintain records of the amounts of each fuel combusted during each day for the determination of an annual emission rate.

b. The facility must maintain records attesting to the occurrence and duration of any startup, shutdown, or malfunction in the operation of the Wellons (5600); any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

c. The facility shall maintain a file of all measurements, including continuous opacity monitoring system, required pollutant monitoring device, and performance testing measurements; all continuous opacity monitoring system performance evaluations; all continuous opacity monitoring system or required pollutant monitoring device calibration checks; adjustments and maintenance performed on these systems or devices.

[45CSR13, Permit No. R13-1622 (Conditions 4.3.4.2., 4.3.4.3., and 4.3.4.4.)] *(This requirement satisfactorily meets a condition of the Compliance Assurance Monitoring Plan for the Wellons Energy System.*)

5.4.2. Temperature measurements of the Wellons exhaust gases shall be recorded at least every 15 minutes using a dedicated computer equipped with a relational database that will serve as the Data Acquisition System (DAS).
[40 C.F.R. §64.3(b)(4); 45CSR§30-5.1.c.]

5.4.3. During normal operations, the presence of NOx lb/MMBtu outside the established ranges shall be investigated and corrected a soon as practicable. All excursions shall be documented and maintained for a period of not less than five (5) years and shall be made available to the Director or his authorized representative. The record of excursions should include the measure taken to correct the excursion.
[40 C.F.R. §64.7(d); 45CSR§30-5.1.c.]

5.4.4. For the purpose of determining compliance with 5.1.3, the facility shall maintain monthly certified records using the sample record keeping form originally appended to permit R13-1622C as Attachment A (Title V Permit Attachment D). Alternatively the permittee may propose to the Director a different form of record keeping from that appended as ATTACHMENT A (Title V Permit Attachment D). All records are to be initialed by the "Responsible Official", using the space provided in ATTACHMENT A (Title V Permit Attachment D), within ten (10) days after the end of each calendar month. The CERTIFICATION OF DATA ACCURACY (Title V Permit Attachment A), appearing in R13-1622C ATTACHMENT A (Title V Permit Attachment D), must be completed by a "Responsible Official" within fifteen (15) days after the end of each calendar year. In the event the permittee should substitute its own record keeping form for R13-1622C ATTACHMENT A (Title V Permit Attachment D), the CERTIFICATION OF DATA ACCURACY (Title V Permit Attachment A) must be copied to the reverse side and properly completed within the time frame referenced above. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
[45CSR13, Permit R13-1622 (Condition 4.3.5.)]

5.5. Reporting Requirements

5.5.1. The permittee shall submit to the Director excess emission reports, on a calendar quarter basis, during which there are excess emissions from the facility. If there are no excess emissions during the calendar quarter, the permittee shall note that fact in its semiannual report. Excess emissions are herein defined as, 1) During any 60-minute block period, more than 20 opacity readings (15-second intervals) exceeding 20% and any single opacity reading exceeding 40%. All reports shall be postmarked within 30 days following the end of each calendar quarter. All written reports of excess emissions shall include the following information:

a. The magnitude of excess emissions, any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.

b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility. The nature and cause of any malfunction, the corrective action taken or preventative measures adopted.

c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

d. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

[45CSR13, Permit No. R13-1622 (Condition 4.4.1.) ***and*** **40CSR§30-12.7]** *(This requirement satisfactorily meets a condition of the Compliance Assurance Monitoring Plan for the Wellons Energy System.*)

5.6. Compliance Plan

5.6.1. Reserved.

6.0 Board Press (Em. Pt. ID 7890)

6.1. Limitations and Standards

6.1.1. No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7. Based on the process weight rates of the Board Press (7890), the corresponding allowable particulate matter emission rate is 31.8 pounds per hour. **[45CSR§7-4.1.]**

6.1.2. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7, as mentioned in 6.1.1., may be permitted by the Director for periods not to exceed ten (10) days upon specific applications to the Director. Such application shall be made within 24 hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. **[45CSR§7-9]**

6.1.3. Emissions from the OSB board press and RTO/RCO shall not exceed:

Pollutant	**Emissions**	
	(lbs/hr)	tpy
PM (filterable fraction only)	12.1	46
CO	24.8	94.2
NOx	7.5	28.5
VOCs[1] (as Carbon)	3.7	14.2
Acetaldehyde	0.21	0.8
Formaldehyde	5.4	20.4
Methanol	5.8	21.9
Phenol	0.4	1.4
Total HAPs (as Carbon)	3.7	14.2

[1]VOC emissions include formaldehyde.

Compliance with the PM limitations assures compliance with the less stringent limit of subsection 6.1.1.

6.1.3.1. VOC and Total HAP emissions limits in table 6.1.3. are based on EPA Method 25 and expressed on an as Carbon basis. All other emissions are on a mass basis for that specific pollutant.

[45CSR13, Permit No. R13-1622 (Condition 4.1.2. and 4.1.2.1.)]

6.1.4. The facility shall use powdered resin formulations for the production of oriented strand board. The two different resin formulations which are used in the core and the surface layers of the board mats are to contain no more than 0.4% and 0.1% free formaldehyde respectively.
[45CSR13, Permit No. R13-1622 (Condition 4.1.8.)]

6.1.5. Resin consumption rates for the OSB facility are not to exceed 772 tons per month, and 9,264 tons per year.
[45CSR13, Permit No. R13-1622 (Condition 4.1.9.)]

6.1.6. The permittee must use an emissions control system and demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 to 40 C.F.R. 63 Subpart DDDD, which are:

a. Meet at least one of the following conditions:

i. RCO/RTO-1 shall reduce emissions of total HAPs, measured as THC (as carbon) by at least 90%.

ii. Emissions of total HAPs from RCO/RTO-1 measured as THC (as carbon) shall not exceed 20 ppmvd.

iii. RCO/RTO-1 shall reduce emissions of methanol, by at least 90%.

iv. Emissions of methanol from RCO/RTO-1 shall not exceed 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd.

v. RCO/RTO-1 shall reduce emissions of formaldehyde, by at least 90%.

vi. Emissions of formaldehyde from RCO/RTO-1 shall not exceed 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

b. Table 2 - (2) Catalytic Oxidizer: Maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature (condition 6.1.7.) established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months.

i. The permittee may establish a different minimum catalytic oxidizer temperature by submitting the notification specified in 40 C.F.R. §63.2280(g) (permit condition 3.5.10.b.) and conducting a repeat performance test as specified in paragraph 40 C.F.R. §63.2262(l)(1) that demonstrates compliance with the applicable compliance options of 40 C.F.R. 63 Subpart DDDD.

c. If the permittee chooses to comply with one of the concentration-based compliance options for a control system outlet (presented as option numbers 2, 4, and 6 in Table 1B to 40 C.F.R. 63 Subpart DDDD), the permittee must have a capture device that either meets the definition of *wood products enclosure* in 40 C.F.R. §63.2292 or achieves a capture efficiency of greater than or equal to 95 percent.

[40 C.F.R. §63.2240(b) and 63.2262(l)(2); 45CSR34; 45CSR13, Permit No. R13-1622 (Conditions 4.1.12. and 4.1.14.)]

6.1.7. Emissions from the OSB Board Press shall be controlled by RCO/RTO-1.

a. Prior to the initial performance test, when the control device is operating in thermal mode the permittee must maintain the 3 hour block average firebox temperature above 1500°F. After the initial performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where the requirements of the PCWP MACT were met.

b. Prior to the initial performance test, when the control device is operating in catalytic mode the permittee must maintain the 3 hour block average catalytic oxidizer temperature above 800°F. After the initial performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where the requirements of the PCWP MACT were met. Additionally, the permittee must check the activity level of a representative sample of the catalyst at least every 12 months.

[45CSR13, Permit No. R13-1622 (Condition 4.1.13.)]

6.1.8. Routine Control Device Maintenance Exemption (RCDME)

a. The permittee may request a routine control device maintenance exemption from the EPA Administrator for routine maintenance events such as control device bakeouts, washouts, media replacement, and replacement of corroded parts. The permittee's request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how the permittee plans to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the EPA Administrator.

b. The routine control device maintenance exemption must not exceed 0.5 percent of annual operating uptime for the board press.

c. The request for the routine control device maintenance exemption, if approved by the EPA Administrator, must be IBR in and attached to the affected source's title V permit. Refer to Attachment E of this permit.

d. The compliance options and operating requirements do not apply during times when control device maintenance covered under the permittee's approved routine control device maintenance exemption is performed. The permittee must minimize emissions to the greatest extent possible during these routine control device maintenance periods.

e. To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is also shut down.

[40 C.F.R. §§63.2251(a), (b)(2), (c), (d), and (e); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)] (*RTO/RCO*)

6.2. Monitoring Requirements

6.2.1. The permittee shall monitor visible emissions from the Press (7890), in accordance with the following procedures, test methods and frequencies:

a. 40 CFR 60, Appendix A, Method 9 shall be used to determine opacity. Prior notification and pre-test plan are not required to be submitted for each test conducted. In accordance with Method 9, each observation shall be a minimum of six (6) minutes, unless any one 15 second reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.

b. The permittee shall conduct visible emissions tests on quarterly basis. If an exceedance of an applicable limit is observed, the observations for the exceeding emission point will start over with either weekly or monthly checks according to the monitoring frequency outline below.

i. The initial monitoring frequency for performing visible emission tests is on a weekly basis.

ii. If the visible emission tests conducted during six (6) consecutive weeks of operation show opacity within the applicable limits specified in 3.1.7., the tests need only be done once per month.

iii. If the tests conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in 3.1.7., the tests need be done only once per quarter.

[45CSR30-5.1.c]

6.2.2. For the purpose of determining compliance with the resin formulation and maximum resin consumption limitations established in 6.1.4. and 6.1.5., the facility shall maintain monthly certified records using the sample recordkeeping form appended hereto as Attachment C. Alternatively the permittee may propose to the Director a different form of recordkeeping from that appended as Attachment C. All records are to be initialed by the "Responsible Official", using the space provided in Attachment C, within ten (10) days after the end of each calendar month. The CERTIFICATION OF DATA ACCURACY found under Attachment A must be completed by a "Responsible Official" within fifteen (15) days after the end of the calendar year. In the event the permittee should substitute its own record keeping form for Attachment C, the CERTIFICATION OF DATA ACCURACY must be copied to the reverse side and properly completed within the time frame referenced above. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
[45CSR13, Permit No. R13-1622 (Condition 4.3.6.)]

6.2.3. For the Board Press and RTO/RCO System, the permittee must demonstrate continuous compliance with the compliance options (permit condition 6.1.6.a.), and operating requirements (permit condition 6.1.6.b.) according to the methods specified in Table 7 to 40 C.F.R. 63 Subpart DDDD, which are:

a. Collecting and recording the operating parameter monitoring system data (i.e., firebox temperature) listed in Table 2 to 40 C.F.R. 63 Subpart DDDD for the process unit according to 40 C.F.R. §63.2269(a) through (b) (permit condition 3.2.2.) and 40 C.F.R. §63.2270 (permit condition 3.2.3.); and

b. Reducing the operating parameter monitoring system data (i.e., firebox temperature) to the specified averages in units of the applicable requirement according to calculations in 40 C.F.R. §63.2270 (permit condition 3.2.3.); and

c. Maintaining the average operating parameter (i.e., firebox temperature) at or above the minimum established according to 40 C.F.R. §63.2262.

d. Checking the activity level of a representative sample of the catalyst (from the RTO/RCO) at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range.

[40 C.F.R. §63.2271(a); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.); 40 C.F.R. §64.3(a); 45CSR§30-5.1.c.]

6.2.4. **Excursions.** An excursion shall be defined as a 3-hour block average temperature value below the minimum firebox (*i.e.*, combustion chamber) temperature specified in permit condition 6.1.7. for the respective mode in which the RCO/RTO is being operated. Refer to conditions 3.2.5. (response to excursions and exceedances); 3.4.9. (general recordkeeping requirements for CAM); and 3.5.14. (general reporting requirements for CAM) for recordkeeping and reporting requirements for excursions.
[40 C.F.R. §64.6(c)(2); 45CSR§30-5.1.c.]

6.3. Testing Requirements

6.3.1. All visible emissions tests shall be conducted during operating conditions that have the potential to create visible emissions.
[45CSR§30-5.1.c]

6.3.2. If the observer is unable to conduct the visual emission tests due to unit downtime, visual interferences caused by other visible emission sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain or snow, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the checks and/or tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.
[45CSR§30-5.1.c]

6.3.3. Compliance with the emission limitations established for the Board Press (7890) shall be demonstrated by stack testing performed once per permit term in the first year of renewal in accordance with the following methods of 40 C.F.R. 60, Appendix A:

Pollutant	Test Method
CO	EPA Method 10
PM	EPA Method 5
VOC	EPA Method 25 or 25A
Methanol	EPA Method 308, EPA Method 320, NCASI Method CI/WP-98.01, or NCASI Method IM/CAN/WP-99.02
Formaldehyde	EPA Method 0011, 320, 308, NCASI Method IM/CAN/WP-99.02 or Approved Method[1]

Results from such testing shall be submitted to the Director within sixty (60) days from the date of completion of said testing.

[45CSR§30-5.1.c.]

6.3.4. Within 180 days of startup of RTO/RCO-1 in the catalytic mode or by March 29, 2009 whichever is earlier, the permittee shall perform or have performed EPA approved testing to show compliance with the emission limits of 6.1.3 of this permit and 40 CFR 63 Subpart DDDD. Within 90 days of startup of RTO/RCO-1 in the thermal mode the permittee shall perform or have performed EPA approved testing to show compliance with the emission limits of 6.1.3 of this permit and 40 CFR 63 Subpart DDDD. However, testing for Acetaldehyde and Phenol is not required.
[45CSR13, Permit No. R13-1622 (Condition 4.2.3.)]

6.4. Recordkeeping Requirements

6.4.1. The following information shall be recorded in logs and maintained at the permitted facility:

a. Total production of oriented strand board (OSB) in thousand square feet per month.

b. Total amount of core and surface resins charged to the Board Press (7890) in tons per month.

c. Maximum free-formaldehyde content (%) of the core and surface resins used on a monthly basis.

[45CSR§30-5.1.c *and* 45CSR13, Permit No. R13-1622 (Condition 4.3.6.)]

6.4.2. The permittee shall maintain all Material Safety Data Sheets (MSDS) or manufacturer's quotes, which are to contain the free-formaldehyde contents for the surface and core resins used in the manufacturing of OSB, on site and made available to the Director or his/her duly authorized representative.
[45CSR§30-5.1.c.]

[1]Includes NCASI Method CI-WP-98.01

6.5. Reporting Requirements

6.5.1. Reserved.

6.6. Compliance Plan

6.6.1. Reserved.

7.0 All Other Emission Points with Applicable Requirements[1]

7.1. Limitations and Standards

7.1.1. No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7. The following table summarizes the remaining emission points, their process weight rates, the corresponding allowable particulate matter (filterable fraction only) emission rates and the permit limitations.

Emission Source	45CSR7 Allowable Emission Rate (lb/hr)	Permit Limitation (lb/hr)	
Former Area (6800)	31.8	1.03	
Mat Trim (6900)	31.8	0.59	
Edge Seal Paint Booth (8830)	31.8	0.1	
Edge Seal Paint Booth (8835)	31.8	0.1	
Finishing Area (8900)	31.8	0.98	
Silo (8950)	NA	0.44	
Sanding Area (9500)	12.5	1.03	
Screen Fines Transfer System (8960)	13.5	1.13 lb/hr	4.95 tpy
Screening Building Dedust System (8970)	5.4	0.62 lb/hr	2.72 tpy
Silo (9600)	NA	0.3	
Bark Hog (2230)	31.2		
Log Debarkers (1050)	32.8		
Log Flakers (2000)	32		
Blenders (6000)	32.7		

[45CSR§7-4.1.; 45CSR13, Permit No. R13-2261 (Conditions A.1. & B.3.); ***and*** **45CSR13, Permit No. R13-1622 (Condition 4.1.1.)]** ***Compliance with the permit limitations assures compliance with the allowable emission rates established in 45CSR7.***

7.1.2. During emergency episodes or other operating situations (i.e. fire, baghouse failure, etc.) which require the bypass of the baghouse *(8960)* of the screen fines pneumatic transfer system, the abort cyclone is to be used for the recovery of fines from the transfer line prior to being exhausted to the atmosphere. During major outages, the bypass dampers are to be inspected for proper seal.
[45CSR13, Permit No. R13-2261 (Condition A.2.)]

[1] Summarized in the table in permit condition 7.1.1.

7.1.3. No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 [of 45CSR7] is required to have a full enclosure and be equipped with a particulate matter control device.
[45CSR§7-3.7.; 45CSR13, Permit No. R13-2261 (Condition B.3.)] ***(8950-Silo, 9600-Silo)***

7.1.4. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7, as mentioned in 7.1.1., may be permitted by the Director for periods not to exceed ten (10) days upon specific applications to the Director. Such application shall be made within 24 hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9; and 45CSR13, Permit No. R13-2261 (Condition B.3.)] ***(Former Area - 6800, Mat Trim - 6900, Edge Seal Paint Booth - 8830 & 8835, Finishing Area - 8900, and Sanding Area - 9500)***

7.1.5. The permittee must meet each work practice requirement in Table 3 to 40 C.F.R. 63 Subpart DDDD that is applicable, which is: Group 1 miscellaneous coating operations use *non-HAP coatings* as defined in 40 C.F.R. §63.2292.
[40 C.F.R. §63.2241(a); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)]

7.2. Monitoring Requirements

7.2.1. Compliance with the particulate matter emission limitation established for **Former Area (6800), Mat Trim (6900), Finishing Area (8900), Sanding Area (9500), Screen Fines Pneumatic Transfer System (8960), and Screening Building Dedust System (8970)** shall be demonstrated as described below:

The permittee shall practice the proper operation of the baghouse systems, which includes conducting pressure drop measurements, and visual emissions checks according to Method 22 for each baghouse, on a semi-monthly basis. Said pressure drop measurements and visual shall be recorded and maintained on site. If any visible emissions are observed during these checks, or at any other time, the permittee shall conduct a 40 C.F.R. 60, Appendix A, Method 9 evaluation within thirty (30) days. A method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions.

[45CSR§30-5.1.c. and 45CSR13, Permit No. R13-2261 (Condition A.3.)]

7.2.2. Compliance with the particulate matter emission limits for **Edge Seal Paint Booth** shall be demonstrated by practicing proper operation of the filter systems. The permittee shall conduct pressure drop measurements over the filters on a semi-monthly basis. Said pressure drop measurements shall be recorded and maintained on site and shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR§30-5.1.c.]

7.2.3. At least weekly, visual emission checks of each emission point subject to an opacity limit to include the **Blenders (6000)**, **Bark Hog (2230)**, the **Log Debarkers (1050)**, and the **Log Flakers (2000)** shall be conducted. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9

evaluation within twenty four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected within twenty four (24) hours from the time the visible emission condition was identified and the unit is operated at normal operating conditions. A record of each visible emission check required shall be maintained on site. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c.]

7.2.4. In order to demonstrate compliance with the requirements for the silos (8950, 9600) in conditions 7.1.1. and 7.1.3., refer to condition 3.2.1.

7.3. Testing Requirements

7.3.1. Reserved.

7.4. Recordkeeping Requirements

7.4.1. For determining compliance with 7.2.1., the permittee shall maintain records of all pressure drop measurements, visible emissions checks and Method 9 evaluations. Said records shall include, but not be limited to, the date, time, name of emission unit, the results of the check, what action (s), if any, was/were taken, and the name of the observer. All records shall be initialed by a "Responsible Official" and then signed by a "Responsible Official" within thirty (30) days after the end of the calendar month utilizing the CERTIFICATION OF DATA ACCURACY (Attachment A) statement which is to be copied to the reverse side of each reporting form. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request.
[45CSR13, Permit No. R13- 2261 (Condition B.2.)]

7.4.2. The permittee must demonstrate continuous compliance with the non-HAP work practice requirements by continuing to use non-HAP coatings and keeping records showing that the permittee is using non-HAP coatings.
[40 C.F.R. §63.2271(a); 45CSR34; 45CSR13, Permit No. R13-1622 (Condition 4.1.12.)]

7.5. Reporting Requirements

7.5.1. Reserved.

7.6. Compliance Plan

7.6.1. Reserved.

8.0 RICE-1 through RICE-8

8.1. Limitations and Standards

8.1.1. **40 C.F.R. 63 Subpart ZZZZ Compliance Dates**.

8.1.1.1. An existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions must comply with the applicable emission limitations and operating limitations of 40 C.F.R. 63 Subpart ZZZZ no later than May 3, 2013.
[40 C.F.R. §63.6595(a)(1); 45CSR34] (RICE-1)

8.1.1.2. An existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.
[40 C.F.R. §63.6595(a)(1); 45CSR34] (RICE-2 through RICE-8)

8.1.2. The permittee must comply with the emission limitations in Table 2c to 40 C.F.R. 63 Subpart ZZZZ which apply to you (see Table 2c Requirements, below).

Table 2c Requirements:
For each emergency stationary CI RICE[1] you must meet the following requirement, except during periods of startup

a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[2]
b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.[3]

During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.[3]

[1] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of 40 C.F.R. 63 Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[2] Sources have the option to utilize an oil analysis program as described in 40 C.F.R. §63.6625(i) in order to extend the specified oil change requirement in Table 2c of 40 C.F.R. 63 Subpart ZZZZ.

[3] Sources can petition the Administrator pursuant to the requirements of 40 C.F.R. §63.6(g) for alternative work practices.

[40 C.F.R. §63.6602; 45CSR34] (RICE-1)

8.1.3. The permittee must comply with the emission limitations in Table 2c to 40 C.F.R. 63 Subpart ZZZZ which apply to you (see Table 2c Requirements, below).

Table 2c Requirements:
For each emergency stationary SI RICE[1] you must meet the following requirement, except during periods of startup

a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[2]
b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.[3]

[1] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of 40 C.F.R. 63 Subpart ZZZZ, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[2] Sources have the option to utilize an oil analysis program as described in 40 C.F.R. §63.6625(i) in order to extend the specified oil change requirement in Table 2c of 40 C.F.R. 63 Subpart ZZZZ.

[3] Sources can petition the Administrator pursuant to the requirements of 40 C.F.R. §63.6(g) for alternative work practices.

[40 C.F.R. §63.6602; 45CSR34] (RICE-2 through RICE-8)

8.1.4. At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 C.F.R. §63.6605(b); 45CSR34]

8.1.5. You must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
[40 C.F.R. §63.6625(e)(2); 45CSR34] (RICE-1)
[40 C.F.R. §63.6625(e)(1); 45CSR34] (RICE-2 through RICE-8)

8.1.6. For each existing emergency stationary RICE ≤ 500 HP located at a major source of HAP, complying with work or management practices, you must demonstrate continuous compliance by,

(1) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
(2) Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 C.F.R. §63.6640(a); 45CSR34]

8.2. Monitoring Requirements

8.2.1. Reserved.

8.3. Testing Requirements

8.3.1. Reserved.

8.4. Recordkeeping Requirements

8.4.1. You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.
(2) An existing stationary emergency RICE.

[40 C.F.R. §63.6655(e); 45CSR34]

8.4.2. For an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
[40 C.F.R. §63.6655(f); 45CSR34]

8.4.3. Form and Retention of 40 C.F.R. 63 Subpart ZZZZ Records

(a) Your records must be in a form suitable and readily available for expeditious review according to 40 C.F.R. §63.10(b)(1).

(b) As specified in 40 C.F.R. §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. §63.10(b)(1).

[40 C.F.R. §§63.6660(a), (b), and (c); 45CSR34]

8.5. Reporting Requirements

8.5.1. You must report each instance in which you did not meet each requirement in permit conditions 8.1.2. and 8.1.3. These instances are deviations from the requirements in 40 C.F.R. 63 Subpart ZZZZ. These deviations must be reported according to the requirements in 40 C.F.R. §63.6650 (permit condition 8.5.2.).
[40 C.F.R. §63.6640(b); 45CSR34]

8.5.2. The permittee must report all deviations as defined in 40 C.F.R. §63.6675 in the semiannual monitoring report required by permit condition 3.5.6.
[40 C.F.R. §63.6650(f); 45CSR34]

8.6. Compliance Plan

8.6.1. Reserved.

Attachment A

CERTIFICATION OF DATA ACCURACY

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.

Signature[1] _____ _____
(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.

Attachment B

SO_2 MONITORING PLAN

for the

WELLONS ENERGY SYSTEM

Georgia-Pacific Corporation
Structural Panels Division
79 N. Pax Avenue
Mt. Hope, West Virginia 25880
Telephone (304) 877-5656
Fax (304) 877-5677

WV DIV OF ENVIR PROTECT
OFFICE OF AIR QUALITY

2001 JUN 12 P 1:32

RECEIVED

June 8, 2001

Edward L. Kropp, Chief
Office of Air Quality
7012 MacCorkle Avenue, SE
Charleston, WV 25304

RE: 45CSR10 Monitoring Plan
Facility ID# 019-00034

Dear Mr. Kropp:

It has come to our attention that recent revisions to 45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides require the Mt. Hope OSB facility to submit a monitoring plan for our wood fired furnace, emission point 5600. This source is a manufacturing process source operation that has a PTE of greater than 500 pounds per year of SO_2 emissions, but whose emissions are less than 90% of the applicable standard. Therefore, a monitoring plan is required pursuant to 45CSR10A Section 6.2 a. The monitoring plan must contain information as specified in subsection 6.4. The attached monitoring plan is intended to meet all the requirements of this rule and is being submitted for your approval. Should you have any questions regarding this plan you may contact our facility environmental manager, Mr. Kim Casto, at 304-877-9519.

Respectfully,

Tim Adams
Plant Manager

Attachment

cc: Cliff Bowling, SC069
Paul Vasquez, GA030

of all expected observations. Consequently, by applying one, two, or three standard deviations, we can reliably estimate, with confidence, that any future observation (measurement) will probably fall within this range 68%, 95%, and 99.7% of the time, respectively. Based on above, it is predicted that 99.7% of the time, any future SO2 emission rate observation (test result) will be less 0.91 ppmv, 0.99 lbs/hr, and 0.0056 lb/MMBtu. Applying the 0.0056 lb/MMBtu value to the maximum heat input capacity (240 MMBtu/hr) yields an SO2 emission rate of 1.34 lbs/hr which is considerably less than the allowable of 4.8 lbs/hr contained in our Title V permit and significantly less than the allowable under 45CSR10, which would equate to approximately 2,200 lbs/hr at 2,000 ppmv. Furthermore, the heat input can be determined by tracking the amount of fuel consumed. The amount of woodwaste capable of being combusted was determined based on the maximum heat input capacity of 240MMBtu/hr and the Btu value of woodwaste (4500 Btu/lb). These values result in a maximum fuel consumption rate of 26.7 tons/hr and 640 tons/day. As such, if we know the amount of fuel consumed, and it is within this range, we can be reasonably assured of compliance with the SO2 emission limit.

Parameters to be Monitored:

Since the Wellons Energy System was designed to combust only woodwaste type materials and woodwaste is inherently low in sulfur, and considering the items identified above, we propose only to track the amount of woodwaste combusted in the Wellons Energy System.

Monitoring Method and Frequency for each Parameter:

The amount of woodwaste consumed in the Wellons burner will be recorded daily.

Compliance Range for each Parameter:

The amount of woodwaste combusted in the Wellons burner will range from 0 to 640 tons per day.

How Parameters were Chosen:

See above background information.

How Compliance Ranges were Established:

The range for the quantity of woodwaste capable of being combusted was determined based the maximum heat input capacity of 240MMBtu/hr and the Btu value of woodwaste (4500 Btu/lb). These values result in a maximum fuel consumption rate of 26.7 tons/hr and 640 tons/day

Additional Monitoring Equipment Installed:

No additional monitoring equipment will be installed to demonstrate compliance with this rule.

Response Plan Implemented During Excursions:

No response plan will be developed since the Wellons Energy System is not capable of burning fuels other than woodwaste fuels.

Compliance Testing Schedule:

A compliance test will be conducted on the Wellons burner before February 28, 2002 and every fifth year thereafter. These compliance tests will be conducted in accordance with 40 CFR 60 Appendix A, Method 6.

Attachment C

Monthly Resin Consumption Rates

Title V Attachment C (R13-1622C, ATTACHMENT B)[1][2] - Sample Data Form
Georgia-Pacific Corporation: R13-1622C
Total Resin Consumption Rates

Month	Production (MSF)	Resin-Formaldehyde Composition[3] (%)		Total Resin Usage (lbs)[4]	Total Resin Usage (lbs/MSF)	Initials
		Core	Surface			
January						
February						
March						
April						
May						
June						
July						
August						
September						
October						
November						
December						

Rolling Yearly Total[3] : _____

Note:
(1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side must be completed within fifteen (15) days of the end of the reporting period.
(2) This record shall be maintained on site for a period of five (5) years from the date of certification. It shall be made available upon request to the Director or his (her) authorized representative.
(3) Composition of formaldehyde in the core and surface resins are not to exceed 0.4% and 0.1% respectively.
(4) Rolling monthly total resin consumption is not to exceed 772 tons/month. or 9,265 tons/yr.

Attachment D

Sample Data Form
Wellons Unit - Fuel Consumption Rates

Title V Attachment D (R13-1622C, ATTACHMENT A)[(1)(2)] - Sample Data Form
Georgia-Pacific Corporation: R13-1622C
Wellons Unit - Fuel Consumption Rates

Month: _____ Year:

Day	Hours of Operation	Total Wood Fuels Consumed (tons)	Natural Gas Usage		Reason for Utilizing Natural Gas As Fuel Source
			(ft^3/day)	(avg. ft^3/hr)	
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
Total:					

Note:
(1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side must be completed within fifteen (15) days of the end of the reporting period.
(2) This record shall be maintained on site for a period of five (5) years from the date of certification. It shall be made available upon request to the Director or his (her) authorized representative.
(3) Wood waste usage for fuel is not to exceed 22.7 tons/hr of wood bark, and 2.1 tons/hr of wood trimmings and sander dust.

Attachment E

Routine Control Device Maintenance Exemption

dep

west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

Joe Manchin III, Governor
Randy C. Huffman, Cabinet Secretary
www.wvdep.org

October 13, 2009

CERTIFIED MAIL
Article # 91 7108 2133 3936 1553 3708

Georgia-Pacific Wood Products, LLC
c/o Neill Belt
79 N. Pax Avenue
Mt. Hope, WV 25880

91 7108 2133 3936 1553 3708

RE: PCWP MACT
Maintenance Exemption Approval
Mt. Hope Facility
Plant ID# 019-00034

Dear Mr. Belt:

Your company's request for a routine control device maintenance exemption, per 40 CFR 63.2251, from certain requirements of the Plywood and Composite Wood Products (PCWP) MACT (40 CFR 63, subpart DDDD) was received by the West Virginia Division of Air Quality (DAQ) on September 5, 2007. After receiving subsequent documents detailing the minimization strategies which the facility will employ, DAQ was able to make a final review of your request and **grants** the routine control device maintenance exemption for the RCO at the Mt. Hope facility subject to the following:

- The exemption allows process units subject to the Plywood and Composite Wood Products MACT to operate while their controlling RCO is offline for routine maintenance. But, for each process unit, only a given percentage of its annual operating hours may be during periods when its controlling RCO is offline for routine maintenance. The exemption at your facility applies to the press and is for 0.5% of its annual operating hours.

- During any period of routine control device maintenance for the RCO the facility must keep record of the time and date of each start-up and each shut-down for the RCO and also for the press. Additionally, total hours operated and hours operated while the RCO is offline for routine maintenance must be recorded for the press on a rolling twelve month basis.

- In order to minimize emissions the facility shall not process any pine during any time when the RCO is offline for routine maintenance and the press continues to operate

- Prior to any routine RCO maintenance being performed under this exemption, the facility will produce and subsequently follow a standard operating procedure (SOP) which states how pine will be kept out of the feedstock processed during periods when routine RCO maintenance is being performed. This SOP must be submitted as part of the next Rule 13 permit modification sought for the facility at Mt. Hope.

- In order to document that no pine is processed when the RCO is offline for routine maintenance and the press continues to operate, the facility will keep records which

Promoting a healthy environment.

indicate how much, if any, pine is processed during any period of routine RCO maintenance.

- As a minimization strategy, the facility shall to the greatest extent practically possible perform routine RCO maintenance during periods when the press is already offline (not producing product) for maintenance or other reasons.

Also, please be aware that this exemption only applies to the PCWP MACT requirements. If you operate with the RCO offline and that causes some other rule, permit limit or requirement to be violated, the exemption does not cover that. If you have any questions or comments you may contact Eric Ray by phone at (304) 926-0499 x 1382 or by e-mail at Richard.Eric.Ray@wv.gov.

Sincerely,

John A. Benedict
Director

cc: Kathleen Anderson, Chief - Permits and Technical Assessment Branch
USEPA Region III (3AP11)
1650 Arch Street
Philadelphia, PA 19103-2029

Judith Katz, Director - Air Protection Division
USEPA Region III (3AP00)
1650 Arch Street
Philadelphia, PA 19103-2029