# MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

May 12, 2005

# **NEW SOURCE REVIEW PERMIT TO INSTALL**

101-05

## **ISSUED TO**

Devereaux Sawmill, Inc.

#### LOCATED AT

2872 North Hubbardston Road Pewamo, Michigan

IN THE COUNTY OF

Ionia

## STATE REGISTRATION NUMBER

N2157

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203:				
May 2, 2005				
DATE PERMIT TO INSTALL APPROVED:	SIGNATURE:			
May 12, 2005				
,				
DATE PERMIT VOIDED:	SIGNATURE:			
DATE PERMIT REVOKED:	SIGNATURE:			

# PERMIT TO INSTALL

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**Common Abbreviations / Acronyms** 

	Common Abbreviations / Acronyms					
	Common Acronyms		Pollutant / Measurement Abbreviations			
AQD	Air Quality Division	Btu	British Thermal Unit			
BACT	Best Available Control Technology	°C	Degrees Celsius			
CAA	Clean Air Act	CO	Carbon Monoxide			
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot			
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter			
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit			
EPA	Environmental Protection Agency	gr	Grains			
EU	Emission Unit	Hg	Mercury			
FG	Flexible Group	hr	Hour			
GACS	Gallon of Applied Coating Solids	$H_2S$	Hydrogen Sulfide			
GC	General Condition	hp	Horsepower			
HAP	Hazardous Air Pollutant	lb	Pound			
HVLP	High Volume Low Pressure *	m	Meter			
ID	Identification	mg	Milligram			
LAER	Lowest Achievable Emission Rate	mm	Millimeter			
MACT	Maximum Achievable Control Technology	MM	Million			
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts			
MAP	Malfunction Abatement Plan	NOx	Oxides of Nitrogen			
MDEQ	Michigan Department of Environmental Quality	PM	Particulate Matter			
MSDS	Material Safety Data Sheet	PM-10	Particulate Matter less than 10 microns diameter			
NESHAP	National Emission Standard for Hazardous Air Pollutants	pph	Pound per hour			
NSPS	New Source Performance Standards	ppm	Parts per million			
NSR	New Source Review	ppmv	Parts per million by volume			
PS	Performance Specification	ppmw	Parts per million by weight			
PSD	Prevention of Significant Deterioration	psia	Pounds per square inch absolute			
PTE	Permanent Total Enclosure	psig	Pounds per square inch gauge			
PTI	Permit to Install	scf	Standard cubic feet			
RACT	Reasonable Available Control Technology	sec	Seconds			
ROP	Renewable Operating Permit	$SO_2$	Sulfur Dioxide			
SC	Special Condition Number	THC	Total Hydrocarbons			
SCR	Selective Catalytic Reduction	tpy	Tons per year			
SRN	State Registration Number	μg	Microgram			
TAC	Toxic Air Contaminant	VOC	Volatile Organic Compounds			
VE	Visible Emissions	yr	Year			

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

#### **GENERAL CONDITIONS**

- 1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. [R336.1201(1)]
- 2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. [R336.1201(4)]
- 3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. [R336.1201(6)(b)]
- 4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. [R336.1201(8), Section 5510 of Act 451, PA 1994]
- 5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R336.1219. The written request shall be sent to the District Supervisor, Air Ouality Division, Michigan Department of Environmental Ouality. [R336.1219]
- 6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. [R336.1901]
- 7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). [R336.1912]
- 8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

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- 9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
- 10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.
- 11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R336.1303. [R336.1301]
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this permit to install.
- 12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R336.1370(2). [R336.1370]
- 13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R336.2001 and R336.2003, under any of the conditions listed in R336.2001. [R336.2001]

# SPECIAL CONDITIONS

# **Emission Unit Identification**

<b>Emission Unit ID</b>	Emission Unit Description	Stack Identification
EU-HeadSaw	A saw milling process consisting of a headsaw, a	SV1
	linebar resaw, and an edger all controlled by a common	
	dust collection system and cyclone dust collector (#1).	
	The collected sawdust is transferred pneumatically to	
	either the wet silo or the cement silo.	
EU-EndTrimmer	A saw milling process consisting of an end trimmer	SV2
	controlled by a cyclone dust collector (#2). The	
	collected sawdust is transferred pneumatically to the	
	dry silo.	
EU-WetSilo	A sawdust storage silo controlled by a cyclone dust	SV3
	collector (#3). Sawdust in this silo may be transferred	
	pneumatically to the cement silo.	
EU-DrySilo	A sawdust storage silo controlled by a cyclone dust	SV4
	collector (#4). Sawdust in this silo may be transferred	
	pneumatically to the cement silo.	
EU-CementSilo	A sawdust storage silo controlled by a cyclone dust	SV5
	collector (#5).	
Changes to the equipment	t described in this table are subject to the requirements of R	336.1201, except as

Changes to the equipment described in this table are subject to the requirements of R336.1201, except as allowed by R336.1278 to R336.1290.

# The following conditions apply to: EU-HeadSaw

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
1.1a	PM	EU-HeadSaw	0.10 lbs per	Test Protocol	General	R336.1331
			1000 lbs of		Condition	
			exhaust		No. 13	
			gases*			
1.1b	PM-10	EU-HeadSaw	9.6 Pounds	Test Protocol	General	40 CFR 52.21
			Per Hour		Condition	Subparts (c) &
					No. 13	(d)
	* Calculated	on a dry gas basis				

## **Process / Operational Limits**

1.2 The permittee shall not operate EU-HeadSaw for more than 4500 hours per 12-month rolling time period as determined at the end of each calendar month. [R336.1901, 40 CFR 52.21(c) & (d)]

# **Equipment**

1.3 The permittee shall not operate EU-HeadSaw unless the dust collection system and cyclone dust collector (#1) are installed, maintained and operated in a satisfactory manner. [R336.1331, R336.1901, R336.1910]

#### Recordkeeping /Reporting /Notification

1.4 Each calendar month, the permittee shall keep, in a satisfactory manner, a written log of the monthly and 12-month rolling time period hours of operation for EU-HeadSaw. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, 40 CFR 52.21(c) & (d)]

## **Stack / Vent Restrictions**

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement
1.5	SV1	60.0	35.0*	R336.1901, 40 CFR 52.21(c) & (d)
				40 CFR 32.21(c) & (u)

The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.

\* This minimum height requirement applies on and after July 18, 2005.

# The following conditions apply to: EU-EndTrimmer

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
2.1a	PM	EU-EndTrimmer	0.10 lbs per	Test Protocol	General	R336.1331
			1000 lbs of		Condition	
			exhaust		No. 13	
			gases*			
2.1b	PM-10	EU-EndTrimmer	2.9 Pounds	Test Protocol	General	40 CFR 52.21
			Per Hour		Condition	Subparts (c) &
					No. 13	(d)
	* Calculated	on a dry gas basis				

## **Process / Operational Limits**

2.2 The permittee shall not operate EU-EndTrimmer for more than 4500 hours per 12-month rolling time period as determined at the end of each calendar month. [R336.1901, 40 CFR 52.21(c) & (d)]

# **Equipment**

2.3 The permittee shall not operate EU-EndTrimmer unless the cyclone dust collector (#2) is installed, maintained and operated in a satisfactory manner. [R336.1331, R336.1901, R336.1910]

# **Recordkeeping / Reporting / Notification**

2.4 Each calendar month, the permittee shall keep, in a satisfactory manner, a written log of the monthly and 12-month rolling time period hours of operation for EU-EndTrimmer. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, 40 CFR 52.21(c) & (d)]

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement		
2.5	SV2	30.0	35.0	R336.1901,		
				40 CFR 52.21(c) & (d)		
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.					

# The following conditions apply to: EU-WetSilo

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
3.1a	PM	EU-WetSilo	0.10 lbs per	Test Protocol	General	R336.1331
			1000 lbs of exhaust		Condition No. 13	
			gases*		NO. 15	
3.1b	PM-10	EU-WetSilo	4.0 Pounds	Test Protocol	General	40 CFR 52.21
			Per Hour		Condition	Subparts (c) &
					No. 13	(d)
	* Calculated	on a dry gas basis				_

#### **Process / Operational Limits**

3.2 The permittee shall not operate EU-WetSilo for more than 4500 hours per 12-month rolling time period as determined at the end of each calendar month. [R336.1901, 40 CFR 52.21(c) & (d)]

# **Equipment**

3.3 The permittee shall not operate EU-WetSilo unless the cyclone dust collector (#3) is installed, maintained and operated in a satisfactory manner. [R336.1331, R336.1901, R336.1910]

# Recordkeeping /Reporting /Notification

3.4 Each calendar month, the permittee shall keep, in a satisfactory manner, a written log of the monthly and 12-month rolling time period hours of operation for EU-WetSilo. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, 40 CFR 52.21(c) & (d)]

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement		
3.5	SV3	36.0	90.0	R336.1901,		
				40 CFR 52.21(c) & (d)		
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.					

# The following conditions apply to: EU-DrySilo

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
4.1a	PM	EU-DrySilo	0.10 lbs per	Test Protocol	General	R336.1331
			1000 lbs of exhaust		Condition No. 13	
			gases*		NO. 15	
4.1b	PM-10	EU-DrySilo	2.9 Pounds	Test Protocol	General	40 CFR 52.21
			Per Hour		Condition	Subparts (c) &
					No. 13	(d)
	* Calculated	on a dry gas basis				

#### **Process / Operational Limits**

4.2 The permittee shall not operate EU-DrySilo for more than 4500 hours per 12-month rolling time period as determined at the end of each calendar month. [R336.1901, 40 CFR 52.21(c) & (d)]

# **Equipment**

4.3 The permittee shall not operate EU-DrySilo unless the cyclone dust collector (#4) is installed, maintained and operated in a satisfactory manner. [R336.1331, R336.1901, R336.1910]

# Recordkeeping /Reporting /Notification

4.4 Each calendar month, the permittee shall keep, in a satisfactory manner, a written log of the monthly and 12-month rolling time period hours of operation for EU-DrySilo. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, 40 CFR 52.21(c) & (d)]

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement			
		Diameter (menes)	Ground Level (leet)	•			
4.5	SV4	36.0	90.0	R336.1901,			
				40 CFR 52.21(c) & (d)			
	The exhaust gases shall be	e exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.					

# The following conditions apply to: EU-CementSilo

#### **Emission Limits**

	Pollutant	Equipment	Limit	Time Period	Testing/ Monitoring Method	Applicable Requirements
5.1a	PM	EU-CementSilo	0.10 lbs per 1000 lbs of exhaust gases*	Test Protocol	General Condition No. 13	R336.1331
5.1b	PM-10  * Calculated of	EU-CementSilo on a dry gas basis	2.9 Pounds Per Hour	Test Protocol	General Condition No. 13	40 CFR 52.21 Subparts (c) & (d)

#### **Process / Operational Limits**

5.2 The permittee shall not operate EU-CementSilo for more than 4500 hours per 12-month rolling time period as determined at the end of each calendar month. [R336.1901, 40 CFR 52.21(c) & (d)]

# Equipment

5.3 The permittee shall not operate EU-CementSilo unless the cyclone dust collector (#5) is installed, maintained and operated in a satisfactory manner. [R336.1331, R336.1901, R336.1910]

# Recordkeeping /Reporting /Notification

5.4 Each calendar month, the permittee shall keep, in a satisfactory manner, a written log of the monthly and 12-month rolling time period hours of operation for EU-CementSilo. All records shall be kept on file for a period of at least five years and made available to the Department upon request. [R336.1901, 40 CFR 52.21(c) & (d)]

	Stack & Vent ID	Maximum Diameter (inches)	Minimum Height Above Ground Level (feet)	Applicable Requirement			
5.5	SV5	39.0	65.0	R336.1901,			
				40 CFR 52.21(c) & (d)			
	The exhaust gases shall be discharged unobstructed vertically upwards to the ambient air.						