

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

EFFECTIVE DATE: March 8, 2016

REVISION DATES: November 15, 2016, December 1, 2017, April 5, 2019

ISSUED TO:

**Weyerhaeuser NR Company**

State Registration Number (SRN): B7302

LOCATED AT:

4111 West Four Mile Road, Grayling, Crawford County, Michigan 49378

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-B7302-2016c

Expiration Date: March 8, 2021

Administratively Complete ROP Renewal Application Due Between:  
September 8, 2019 and September 8, 2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

**SOURCE-WIDE PERMIT TO INSTALL**

Permit Number: MI-PTI-B7302-2016c

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality



Shane Nixon, Cadillac District Supervisor

## TABLE OF CONTENTS

<b>AUTHORITY AND ENFORCEABILITY .....</b>	<b>3</b>
<b>A. GENERAL CONDITIONS.....</b>	<b>4</b>
Permit Enforceability .....	4
General Provisions.....	4
Equipment & Design .....	5
Emission Limits.....	5
Testing/Sampling .....	5
Monitoring/Recordkeeping .....	6
Certification & Reporting .....	6
Permit Shield .....	7
Revisions .....	8
Reopenings.....	8
Renewals.....	8
Stratospheric Ozone Protection .....	9
Risk Management Plan.....	9
Emission Trading .....	9
Permit To Install (PTI).....	9
<b>B. SOURCE-WIDE CONDITIONS .....</b>	<b>11</b>
<b>C. EMISSION UNIT CONDITIONS .....</b>	<b>14</b>
EMISSION UNIT SUMMARY TABLE.....	14
EUPRESSLINE.....	16
EUPAINTBOOTH.....	21
EUIBW .....	23
EUCOEN .....	27
<b>D. FLEXIBLE GROUP CONDITIONS.....</b>	<b>31</b>
FLEXIBLE GROUP SUMMARY TABLE.....	31
FGDRYERS.....	32
FGWOODHANDLING .....	39
FGDIESEL-ENGINES.....	42
<b>E. NON-APPLICABLE REQUIREMENTS .....</b>	<b>46</b>
<b>APPENDICES .....</b>	<b>47</b>
Appendix 1. Abbreviations and Acronyms.....	47
Appendix 2. Schedule of Compliance.....	48
Appendix 3. Monitoring Requirements .....	48
Appendix 4. Recordkeeping .....	49
Appendix 5. Testing Procedures .....	49
Appendix 6. Permits to Install.....	49
Appendix 7. Emission Calculations .....	51
Appendix 8. Reporting .....	52

## **AUTHORITY AND ENFORCEABILITY**

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

## A. GENERAL CONDITIONS

### Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

### General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the 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 ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
  - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
  - c. Inspect, at reasonable times, any of the following:
    - i. Any stationary source.
    - ii. Any emission unit.
    - iii. Any equipment, including monitoring and air pollution control equipment.
    - iv. Any work practices or operations regulated or required under the ROP.
  - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

### **Equipment & Design**

9. Any 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 Rule 370(2).<sup>2</sup> **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

### **Emission Limits**

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"<sup>2</sup> **(R 336.1301(1))**
  - a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27% opacity.
  - b. A limit specified by an applicable federal new source performance standard.

The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
  - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.<sup>1</sup> **(R 336.1901(a))**
  - b. Unreasonable interference with the comfortable enjoyment of life and property.<sup>1</sup> **(R 336.1901(b))**

### **Testing/Sampling**

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).<sup>2</sup> **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(5))**

## Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. **(R 336.1213(3)(b))**
  - a. The date, location, time, and method of sampling or measurements.
  - b. The dates the analyses of the samples were performed.
  - c. The company or entity that performed the analyses of the samples.
  - d. The analytical techniques or methods used.
  - e. The results of the analyses.
  - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
  - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
  - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
  - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. 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 appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor 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 conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
  - a. The applicable requirements are included and are specifically identified in the ROP.
  - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
  - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
  - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

### Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(10))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

### Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
  - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
  - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
  - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
  - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

### Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(8))**



## Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

## Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates as provided in 40 CFR 68.10(a):
  - a. June 21, 1999,
  - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR Part 68)**

## Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

## Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**

45. The terms and conditions of a PTI 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 the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI 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 Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.<sup>2</sup> **(R 336.1201(4))**

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## **B. SOURCE-WIDE CONDITIONS**

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

## SOURCE-WIDE CONDITIONS

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. CO	224.9 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	Source Wide	SC VI.2	R 336.1205(3)

#### II. MATERIAL LIMIT(S)

NA

#### III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

#### IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

#### V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

#### VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall complete all required calculations and records by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3))
2. The permittee shall keep monthly and 12-month rolling time period CO emission calculation records for all emission units at this source. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3))

See Appendix 7

#### VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

### C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

#### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPRESSLINE	This emission unit covers the Press and associated board conveying equipment. The Biofilter and total enclosure controls the emissions from the press.	08/01/1980 11/14/1995 03/27/2002 08/24/2017	NA
EUPAINTBOOTH	The paint booth is used to paint the edges of the finished Oriented Strand Board (OSB) product. Particulate is controlled by Paint Filter located in the Paint Booth.	06/01/1987	NA
EUIBW	The number 2 thermal oil heater has a burner manufactured by IBW. It is a 40 MMBTU/hr natural gas burner which exhausts directly to the atmosphere through its own stack. The hot oil is used to heat the presses, building heat, and during the winter to heat the water vat used to thaw and clean the logs as they enter the process.	08/01/1980	NA
EUCOEN	The Number 1 thermal oil heater has a burner manufactured by Coen. This burner is rated at 50 MMBTU/hr when fired on wood dust and/or 40 MMBTU/hr on natural gas.	08/01/1980 11/14/1995	FGDRYERS
EUDRYER1	Dryer number 1 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 60 MMBTU/hr with an auxiliary gas start-up burner and a natural gas ring burner rated at 60 MMBTU/hr. Controlled by cyclones followed by a Wet Electrostatic Precipitator (WESP) followed by a Regenerative Thermal Oxidizer (RTO).	10/17/2018	FGDRYERS
EUDRYER2	Dryer number 2 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 60 MMBTU/hr with an auxiliary gas start-up burner and a natural gas ring burner rated at 60 MMBTU/hr. Controlled by cyclones followed by a WESP followed by a RTO.	10/17/2018	FGDRYERS

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUDRYER3	Dryer number 3 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 60 MMBTU/hr with an auxiliary gas start-up burner, and a natural gas ring burner rated at 60 MMBTU/hr. Controlled by cyclones followed by a WESP followed by a RTO.	10/17/2018	FGDRYERS
EUDRYER4	Dryer number 4 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 60 MMBTU/hr with an auxiliary gas start-up burner, and a natural gas ring burner rated at 60 MMBTU/hr. Controlled by cyclones followed by a WESP followed by a RTO.	10/17/2018	FGDRYERS
EUDRYFUEL	Waste material is transferred from FGWOODHANDLING and flake screening areas and delivered as dry fuel to the wood burners in EUCOEN and EUDRYER1 through EUDRYER4. This system is controlled by a cyclone and baghouse.	08/01/1980	FGWOODHANDLING
EUFINISHING	Pressed board is finished to the final product, packaged, and shipped. Controlled by a Cyclone and Baghouse.	08/01/1980 11/14/1995	FGWOODHANDLING
EUFLAQ	Forming Line Air Quality Pneumatic pickups on the surface forming equipment contain vagrant particulates within the system. Controlled by a Baghouse	08/01/1980 06/17/2009	FGWOODHANDLING
EUMATTRIM	Formed mat trim line Controlled by a Baghouse.	08/01/1980	FGWOODHANDLING
EUCLEANUP	Cleanup system for screens and dry bins area. This is a pneumatic system with dust pickups, servicing screens, conveyors, dry bins, and associated equipment for housekeeping purposes. Controlled by a Baghouse and Enclosure.	01/01/1992	FGWOODHANDLING
EUDIESELHOTOIL	Diesel emergency hot oil pump (85 HP)	08/01/1980 07/06/2006	FGDIESEL-ENGINES
EUEMERGENCYGEN	Diesel emergency generator (250 HP)	08/01/1980 09/01/1987	FGDIESEL-ENGINES
EUFIREPUMP	Diesel emergency fire pump (281HP)	08/01/1980	FGDIESEL-ENGINES
EUBLENDVENT	Blending core transfer, and core forming area controlled by a baghouse. The baghouse fan is rated at 42,000 acfm.	07/14/2012	FGWOODHANDLING

**EUPRESSLINE  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Covers the Press and associated board conveying equipment. (PTI Nos: 535-94, 535-94B, 535-94E and 535-94F)

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

Biofilter and total enclosure controls the emissions from the press.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	10.5 pph <sup>2</sup>	Hourly	EUPRESSLINE	SC V.1	R 336.1205(3)
2. PM10	10.5 pph <sup>2</sup>	Hourly	EUPRESSLINE	SC V.1	40 CFR 52.21 (c) and (d)
3. PM2.5	10.5 pph <sup>2</sup>	Hourly	EUPRESSLINE	SC V.1	40 CFR 52.21 (c) and (d)
4. CO	11.4 pph <sup>2</sup>	Hourly	EUPRESSLINE	SC V.1	R 336.1205(3)
5. CO	50 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	EUPRESSLINE	SC VI.7	R 336.1205(3)
6. Formaldehyde	1.0 pph <sup>1</sup>	Hourly, except during bypass of the bio-filter, as allowed by SC III.3	EUPRESSLINE	SC V.1	R 336.1225
7. Formaldehyde	90% reduction <sup>2</sup>	Measured over the 3-hour performance test	EUPRESSLINE	SC V.2	40 CFR 63.2240(b)
8. VOC (expressed as carbon)	19.5 pph <sup>2</sup>	Per hour, based on a 30-day rolling time period	EUPRESSLINE	SC VI.3	R 336.1702(a)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

- The permittee must maintain the 24-hour block bio-filter bed temperature within the range established during compliance testing according to 40 CFR 63.2262(m).<sup>2</sup> (R 336.1225, R 336.1702(a), 40 CFR 63.2240(b))
- The permittee shall not bypass the bio-filter for more than 0.5% of the annual operating time for EUPRESSLINE.<sup>2</sup> (R 336.1225, R 336.1702(a), 40 CFR 63.2251(b)(2))
- The permittee shall not operate EUPRESSLINE unless the bio-filter is operating properly, except during bypass conditions as stated below and in the Routine Control Device Maintenance Exemption.<sup>2</sup> (R 336.1225, R 336.1702(a), R 336.1910, 40 CFR 60.11(d), 40 CFR 63.2251)



- a. The permittee shall not bypass the bio-filter unit except for necessary maintenance, repair, or parts replacement on the bio-filter unit.

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The VOC Continuous Emission Rate Monitoring System (CERMS) shall be installed, calibrated, maintained, and operated in accordance with the procedures in 40 CFR Part 60, Appendix B, Performance Specifications 6.<sup>2</sup> **(R 336.2154, 40 CFR 60.13, 40 CFR Part 60, Appendix B)**
2. The permittee shall install operate and maintain a system to continuously monitor the bed temperature in the bio-filter.<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 63.2262(m))**
3. For each temperature monitoring device permittee must meet the requirements in 40 CFR 63.2269(a) and 40 CFR 63.2269(b)(1) through (6). The permittee must install, operate and maintain each continuous monitoring system according to the following: The monitoring system must be capable of completing a minimum of one cycle of monitoring and recording for each successive 15-minute period. The permittee must at all times maintain the monitoring equipment including, but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. The permittee must record the results of each inspection, calibration, and validation checks.<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 63.2269(a) and (b))**
4. The permittee must maintain the design of the enclosure surrounding the press area so that it meets the definition of a wood products enclosure in 40 CFR 63.2292.<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 63.2240(b))**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall verify the PM, PM10, PM2.5, CO, and Formaldehyde emission rates, in pounds per hour, from EUPRESSLINE during normal operation, by testing at owner's expense, in accordance with Department requirements, once every five years. Testing shall be performed using an approved EPA Method listed in:

<b>Pollutant</b>	<b>Test Method Reference</b>
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M (At the time of issuance of PTI 535-94F, there was no approved test method for PM2.5. Therefore, the PM10 test results can be used to satisfy the PM2.5 testing requirement.)
CO	40 CFR Part 60, Appendix A
Formaldehyde	40 CFR Part 63 Subpart DDDD, Table 4. Testing conducted as required in SC V.2 satisfies this requirement as long as the test results are valid, and the testing is conducted at least once every five years.

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The plan shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c) and (d))**

2. The permittee shall conduct a repeat performance test for formaldehyde destruction efficiency using the applicable methods specified in Table 4 of 40 CFR Part 63, Subpart DDDD within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50% by volume of the biofilter bed media with the same type of media. The permittee must reestablish the biofilter temperature range during this testing if the biofilter has been modified since the last testing. **(40 CFR 63.2262(m), 40 CFR 63.2260, 40 CFR 63.7(e),**

**40 CFR Part 63, Subpart DDDD, Table 7(3))**

3. The permittee shall perform the Quality Assurance Procedures of the CERMS set forth in Appendix F of 40 CFR Part 60. **(R 336.1213(3), 40 CFR Part 60, Appendix F)**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations and records by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1702, 40 CFR 52.21(c) and (d))**
2. The permittee shall monitor and record the volumetric flow rate at the bio-filter stack, except during bypass, on a continuous basis.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**
3. Except during bypass of the bio-filter, the permittee shall continuously monitor and record, in a satisfactory manner, the VOC emissions from the EUPRESSLINE bio-filter stack. The permittee shall operate the CERMS to meet the timelines, requirements and reporting detailed in Appendix 3 and shall use the CERMS data for determining compliance with SC I.8.<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 60.13)**
4. The permittee shall monitor, in a satisfactory manner, and record the time and duration of any bio-filter bypass on a daily basis.<sup>2</sup> **(R 336.1225, R 336.1702(a), R 336.1910)**
5. During bypass of the bio-filter, the permittee shall monitor and record the tons of finished product, tons of hardwood usage, percent of hardwood usage, tons of pine usage, and percent of pine usage during bypass for each day that the biofilter is bypassed, as well as calculate the VOC emissions per the formula found in Appendix 7.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1702(a), 40 CFR 52.21(j))**
6. The tons of finished product and hours of operation for EUPRESSLINE shall be monitored and recorded daily.<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1213(3), R 336.1702(a), 40 CFR 52.21(j))**
7. The permittee shall use the most recent stack testing data and perform monthly calculations, to show compliance with the 12-month rolling time period limit for CO (see Appendix 7).<sup>2</sup> **(R 336.1205, R 336.1225, R 336.1213(3), 40 CFR 52.21(c) and (d))**
8. The permittee shall continuously monitor and record biofilter bed temperature data for EUPRESSLINE in accordance with 40 CFR Part 63, Subpart DDDD, Table 2 (3), and determine the 24 hour block average of all recorded readings calculated after 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours (excluding periods described in paragraphs 40 CFR 63.2270(b)).<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 63.2269(b), 40 CFR 63.2270(e))**
9. The permittee shall maintain the 24-hour block bio-filter bed temperature during normal operation within the range listed in the MAP and established during performance testing. For the purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or quality assurance control activities. The permittee must use all the data collected during all other periods in assessing compliance.<sup>2</sup> **(R 336.1225, R 336.1702(a), 40 CFR 63.2270)**

**See Appendix 7**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit a compliance report semiannually. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. The report must contain the information in 40 CFR 63.2281(c). **(40 CFR 63.2281(b) and (c). 40 CFR Part 63, Subpart DDDD, Table 9)**
5. The permittee must submit a compliance report annually to the USEPA. The report shall be postmarked or received by the USEPA by March 15. The report must contain the information in 40 CFR 63.2281(c).<sup>2</sup> **(40 CFR 63.2281(b) and (c). 40 CFR Part 63, Subpart DDDD, Table 9)**
6. If EUPRESSLINE has a startup, shutdown, or malfunction during the reporting period that is not consistent with their Startup, Shutdown, or Malfunction Plan (SSMP), the permittee must submit an immediate Startup, Shutdown and Malfunction report by fax, email or telephone within 2 working days after starting actions inconsistent with the plan to the AQD District office. This report shall be followed by a letter within 7 working days after the end of the event. The report shall contain the actions taken for the event and the name, title and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred. **(40 CFR 63.10(d)(5)(ii), 40 CFR Part 63, Subpart DDDD, Table 9)**
7. The results of annual audits of CERMS equipment shall be submitted to the AQD District Supervisor within 30 days of completion of the audit. Quarterly audits shall be submitted within 30 days from the end of the quarter.<sup>2</sup> **(40 CFR Part 60, Appendix F, 40 CFR 60.7)**
8. The permittee shall submit two complete test protocols, for CERMS or stack testing, to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.<sup>2</sup> **(R 336.2001(3), 40 CFR 60.13, 40 CFR 63.7(b)(1), 40 CFR 63.7(c)(2)(iv))**
9. The permittee shall submit two complete test reports of CERMS or stack testing results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.<sup>2</sup> **(40 CFR 60.13, 40 CFR 63.7(b)(1), 40 CFR 63.7(c)(2)(iv), R 336.2001(5))**
10. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
11. The permittee must submit documentation that the wood products enclosure meets the press enclosure design criteria in 40 CFR 63.2292 with your Notification of Compliance Status for EUPRESSLINE. **(40 CFR 63.2267)**
12. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an EER and summary report, one to the Technical Programs Unit Supervisor and one to the District Supervisor, in an acceptable format to AQD within 30 days following the end of each calendar quarter. The summary report shall include at a minimum exceedances of emissions limits, all periods of monitoring system downtime, corrective action taken for exceedances and downtime, and total source operation time for each quarter.<sup>2</sup> **(40 CFR 60.7, R 336.2170)**

**See Appendix 8**

### **VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBIOFILTER	72 <sup>2</sup>	199 <sup>2</sup>	R 336.1225, 40 CFR 52.21 (c) and (d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall develop a written SSMP according to the provisions in 40 CFR 63.6(e)(3). **(40 CFR 63.2250(c))**
2. The permittee must abide by the Control Device Routine Maintenance Device exemption approved for the EUPRESSLINE. **(R 336.1910, 40 CFR 63.2251)**
3. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart DDDD National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. **(40 CFR Part 63, Subpart DDDD)**

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUPAINTBOOTH  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

The booth is used to paint the edges of the finished OSB product. Permit to Install No. 535-94

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

Dry fabric filters

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.94 pph <sup>2</sup>	Monthly average	EUPAINTBOOTH	SC VI.3	40 CFR 52.21(j)
2. PM	4.1 tpy <sup>2</sup>	Based on a 12-month rolling time period	EUPAINTBOOTH	SC VI.3	40 CFR 52.21(j)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The paint booth shall not be operated unless all exhaust filters are installed and operating properly.<sup>2</sup> (R 336.1910, R 336.1301(1)(c))
2. The permittee shall maintain the differential pressure across the filter media within the approved range stated in the MAP in accordance with manufacturers specifications. (R 336.1213(3), R 336.1910, R 336.1301(1)(c))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall install, operate and maintain a device to measure the differential pressure across the filter media for EUPAINTBOOTH. (R 336.1213(3))

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall monitor and record the pressure drop across the paint booth, once per day, to show the filter is operating properly. **(R 336.1213(3))**
2. The permittee shall keep monthly records of the amount of paint used, in gallons, for EUPAINTBOOTH. **(R 336.1213(3))**
3. The permittee shall calculate and record monthly the particulate matter emissions for EUPAINTBOOTH in pounds per hour (pph) based on a monthly average and tons per year (tpy) based on a 12-month rolling time period pursuant to calculations in Appendix 7. **(R 336.1213(3))**
4. The permittee shall keep records showing the use of only non-HAP coatings as defined in 40 CFR 63.2292. **(40 CFR 63.2241(a))**

See Appendix 7

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
SV9403710	34 <sup>2</sup>	58 <sup>2</sup>	<b>40 CFR 52.21(j)</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall use only non-Hazardous Air Pollutant coatings as defined in 40 CFR 63.2292. **(40 CFR 63.2241(a))**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUIBW  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

The Number 2 thermal oil heater has a burner manufactured by IBW. It is a 40 MMBTU/hr natural gas burner which exhausts directly to atmosphere through its own stack. The hot oil from this thermal oil heater supplies heat to the presses and plant building heaters. PTI number: 535-94B.

**Flexible Group ID:** NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO <sub>x</sub>	1.9 pp <sup>h</sup>	Based on a 3-hour rolling time period	EUIBW	SC V1 SC VI.3	40 CFR 52.21(j)
2. CO	2.3 pp <sup>h</sup>	Based on a 3-hour rolling time period	EUIBW	SC V1 SC VI.3	40 CFR 52.21(j)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

- The permittee shall perform routine and scheduled maintenance on EUIBW as recommended by the manufacturer and contained in the approved MAP. **(R 336.1911, 40 CFR 63.7540(a)(10)(i-vi) and Table 3)**
- At all times, the permittee must operate and maintain EUIBW including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the USEPA Administrator that 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 CFR 63.7500(a)(3))**
- The permittee must complete an initial tune-up by following the procedures in SC III.5, no later than January 31, 2016. The permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**
- If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual performance tune-up. Each annual tune-up must be conducted no more than 13 months after the previous tune-up. **(40 CFR 63.7515(d))**

5. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs 40 CFR 63.7540(a)(10) through (13), as listed below. **(40 CFR 63.7540(a))**
  - a. The permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as listed below. **(40 CFR 63.7540(a)(10))**
    - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
    - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
    - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). **(40 CFR 63.7540(a)(10)(iii))**
    - iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
    - v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
    - vi. Maintain on-site and submit, if requested by the Administrator, an annual report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
      - (1). The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
      - (2). A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
6. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. Verification of CO and NO<sub>x</sub> emission rates by testing from EUIBW shall be conducted once every five years. **(R 336.1213(3), R 336.2001)**

See Appendix 5

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep records on the amount of natural gas used on a daily basis. **(R 336.1213(3))**
2. The permittee shall monitor and record the hours of operation of EUIBW on a continuous basis. **(R 336.1213(3))**
3. The permittee shall calculate and record the hourly NO<sub>x</sub>, and CO emissions from EUIBW based on a 3-hour rolling time period. **(R 336.1213(3))**



4. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
5. The permittee's records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years and may be kept off site for the remaining 3 years. **(40 CFR 63.7560(a) through (c))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. **(R 336.2001(3))**
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. **(R 336.2001(4))**
6. The permittee shall submit two complete test reports of the stack test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. **(R 336.2001(5))**
7. The permittee must submit an initial Notification of Compliance Status that includes the following information certified and signed by a responsible official: **(40 CFR 63.7545(e))**
  - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit, description of the fuel(s) burned, and justification for the selection of fuel(s) burned during the compliance demonstration. **(40 CFR 63.7545(e)(1))**
  - b. A statement that the facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi).” **(40 CFR 63.7545(e)(8)(i))**
  - c. A statement that the facility has had an energy assessment performed according to 40 CFR 63.7530(e).” **(40 CFR 63.7545(e)(8)(ii))**
  - d. Except for units that burn only natural gas, refinery gas, or other gas 1 fuel, or units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, A statement: “No secondary materials that are solid waste were combusted in any affected unit.” **(40 CFR 63.7545(e)(8)(iii))**
8. For units that are subject only to a requirement to conduct an annual tune-up and not subject to emission limits or operating limits, the permittee shall submit an annual compliance report no later than March 15 for the previous calendar year. **(40 CFR 63.7550(b)(3), 40 CFR 63.7550(b)(4), 40 CFR 63.10(a)(5))**
9. The compliance report must contain the following information. **(40 CFR 63.7550(c))**
  - a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**

- b. Process unit information, emissions limitations, and operating parameter limitations where applicable. **(40 CFR 63.7550(c)(5)(ii))**
- c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
- d. The total operating time during the reporting period. **(40 CFR 63.7550(c)(5)(iv))**
- e. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVIBW	60 <sup>2</sup>	75 <sup>2</sup>	40 CFR 52.21(j)

**IX. OTHER REQUIREMENT(S)**

- 1. Only natural gas shall be used as fuel in EUIBW. **(R 336.1213(3))**
- 2. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants from Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. **(40 CFR Part 63, Subpart DDDDD)**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).  
<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUCOEN  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

The Number 1 thermal oil heater has a burner manufactured by Coen. This burner is rated at 40 MMBTU/hr on natural gas. The heat from this thermal oil heater is used to enhance the heat in EUPRESSLINE. The exhaust may be bypassed to its own stack (SVCOEN) when operated on natural gas only. This emission unit table shows conditions EUCOEN is subject to when it is burning natural gas only and exhausting through SVCOEN. When firing wood and wood dust the exhaust shall be directed through the dryers and WESP and RTO. The conditions EUCOEN is subject to when firing wood and wood dust are located in FGDRYERS. PTI number: 535-94A.

**Flexible Group ID:** FGDRYERS

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NO <sub>x</sub>	5.0 pph <sup>2</sup>	Natural gas fuel only	EUCOEN	SC VI.3	<b>40 CFR 52.21(j)</b>
2. CO	3.4 pph <sup>2</sup>	Natural gas fuel only	EUCOEN	SC VI.3	<b>40 CFR 52.21(j)</b>

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. When burning natural gas only, exhaust gas from the EUCOEN may exhaust either through SVCOEN or through the WESP and RTO.<sup>2</sup> **(40 CFR 52.21(j))**
2. The permittee shall perform routine and scheduled maintenance on EUCOEN as recommended by the manufacturer and contained in the approved MAP. **(R 336.1911, 40 CFR 63.7540(a)(10)(i-vi) and Table 3)**
3. At all times, the permittee must operate and maintain EUCOEN including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the USEPA Administrator that 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 CFR 63.7500(a)(3))**
4. The permittee must complete an initial tune-up by following the procedures in SC III.6, no later than January 31, 2016. The permittee must complete the one-time energy assessment no later than January 31, 2016. **(40 CFR 63.7510(e))**

5. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual performance tune-up. Each annual tune-up must be conducted no more than 13 months after the previous tune-up. **(40 CFR 63.7515(d))**
6. The permittee must demonstrate continuous compliance with the work practice standards in 40 CFR Part 63, Subpart DDDDD, Table 3 that applies according to the methods specified in 40 CFR 63.7540a)(10) through (13), as listed below. **(40 CFR 63.7540(a))**
  - a. The permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as listed below. **(40 CFR 63.7540(a)(10))**
    - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
    - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
    - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). **(40 CFR 63.7540(a)(10)(iii))**
    - iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
    - v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
    - vi. Maintain on-site and submit, if requested by the Administrator, an annual report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
      - (1). The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
      - (2). A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
      - (3). If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**
7. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

NA

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall record and maintain records of the amounts of natural gas combusted in EUCOEN each calendar day. **(40 CFR 60.48c(g), R 336.1213(3))**
2. The permittee shall monitor and record the hours of operation of EUCOEN on a continuous basis when venting to SVCOEN. **(R 336.1213(3))**

3. The permittee shall calculate the hourly NO<sub>x</sub> and CO emissions from EUCOEN monthly when firing natural gas only. **(R 336.1213(3))**
4. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
5. The permittee's records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records must be kept on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years and may be kept off site for the remaining 3 years. **(40 CFR 63.7560(a) through (c))**

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee must submit an initial Notification of Compliance Status that includes the following information certified and signed by a responsible official: **(40 CFR 63.7545(e))**
  - a. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit, description of the fuel(s) burned, and justification for the selection of fuel(s) burned during the compliance demonstration. **(40 CFR 63.7545(e)(1))**
  - b. A statement that the facility complies with the required initial tune-up according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi).” **(40 CFR 63.7545(e)(8)(i))**
  - c. A statement that the facility has had an energy assessment performed according to 40 CFR 63.7530(e).” **(40 CFR 63.7545(e)(8)(ii))**
5. For units that are subject only to a requirement to conduct an annual tune-up and not subject to emission limits or operating limits, the permittee shall submit an annual, compliance report no later than March 15 for the previous calendar year. **(40 CFR 63.7550(b)(3), 40 CFR 63.7550(b)(4), (40 CFR 63.10(a)(5))**
6. The compliance report must contain the following information. **(40 CFR 63.7550(c))**
  - a. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
  - b. Process unit information, emissions limitations, and operating parameter limitations where applicable. **(40 CFR 63.7550(c)(5)(ii))**
  - c. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
  - d. The total operating time during the reporting period. **(40 CFR 63.7550(c)(5)(iv))**
  - e. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**

**See Appendix 8**

## **VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVRTOSTACK	108 <sup>2</sup>	150 <sup>2</sup>	40 CFR 52.21(j)
SVCOEN	60 <sup>2</sup>	75 <sup>2</sup>	40 CFR 52.21(j)

**IX. OTHER REQUIREMENT(S)**

1. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs 40 CFR 63.7540(a)(10) through (13), as listed below. **(40 CFR 63.7540(a))**
  - a. The permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as listed below. **(40 CFR 63.7540(a)(10))**
    - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment. **(40 CFR 63.7540(a)(10)(i))**
    - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. **(40 CFR 63.7540(a)(10)(ii))**
    - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). **(40 CFR 63.7540(a)(10)(iii))**
    - iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject. **(40 CFR 63.7540(a)(10)(iv))**
    - v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. **(40 CFR 63.7540(a)(10)(v))**
    - vi. Maintain on-site and submit, if requested by the USEPA Administrator, an annual report containing the information as listed below. **(40 CFR 63.7540(a)(10)(vi))**
      - (1). The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater. **(40 CFR 63.7540(a)(10)(vi)(A))**
      - (2). A description of any corrective actions taken as a part of the tune-up. **(40 CFR 63.7540(a)(10)(vi)(B))**
  - b. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. **(40 CFR 63.7540(a)(13))**
2. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart A and DDDDD, National Emission Standards for Hazardous Air Pollutants from Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters when the emission unit is venting directly to atmosphere and not through the process. **(40 CFR Part 63, Subparts A and DDDDD)**
3. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart A and DDDD National Emissions Standards for Hazardous Air Pollutants for Major Sources: Plywood and Composite Wood Products when the exhaust from the EUCOEN is directly firing and venting through the process **(40 CFR Part 63, Subparts A and DDDD)**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

### FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGDRYERS	This group consists of the 4 wood flake dryers and the number 1 thermal oil heater, EUCOEN, when it is being fired on wood and wood dust and being exhausted through the dryers, cyclones, WESP and RTO.	EUDRYER1 EUDRYER2 EUDRYER3 EUDRYER4 EUCOEN
FGWOODHANDLING	Waste material is transferred from flake screening areas, cleanup system for screens and dry bins area, wood handling systems consisting of press board trim line and the area where pressed board is finished to the final product, packaged, and shipped, and delivered as dry fuel to the wood burners in EUCOEN and EUDRYER1 through EUDRYER4. This is a pneumatic system with dust pickups servicing screens, conveyors, dry bins, and associated equipment for housekeeping purposes.	EUMATTRIM EUFLAQ EUFINISHING EUDRYFUEL EUCLEANUP EUBLENDVENT
FGDIESEL-ENGINES	Emergency diesel-fired engines used during power outages to circulate hot oil for the press and building heat at the facility, to supply emergency electricity, and to pump water during fires.	EUDIESELHOTOIL EUEMERGENCYGEN EUFIREPUMP

**FGDRYERS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

This group consists of the 4 wood flake dryers, and the number 1 thermal oil heater (EUCOEN) when it is being fired on wood and wood dust and being exhausted through the dryers and WESP and RTO.  
 PTI Nos: 535-94, 535-94A, 535-94D, 535-94E, 16-12, 535-94G.

**Emission Units:** EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4, EUCOEN

**POLLUTION CONTROL EQUIPMENT**

Cyclones followed by WESP, followed by a RTO.

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM10	29.8 pph <sup>2</sup>	Hourly	FGDRYERS (during 2-unit RTO operation)	SC V.1 SC VI.10	40 CFR 52.21(c)&(d)
2. PM10	56.6 pph <sup>2</sup>	Hourly	FGDRYERS (during 1-unit RTO operation)	SC V.1 SC VI.10	40 CFR 52.21(c)&(d)
3. PM10	136.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS (during all operations)	SC VI.11	40 CFR 52.21(c)&(d)
4. PM2.5	29.8 pph <sup>2</sup>	Hourly	FGDRYERS (during 2-unit RTO operation)	SC V.1 SC VI.10	40 CFR 52.21(c)&(d)
5. PM2.5	56.6 pph <sup>2</sup>	Hourly	FGDRYERS (during 1-unit RTO operation)	SC V.1 SC VI.10	40 CFR 52.21(c)&(d)
6. PM2.5	136.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS (during all operations)	SC VI.11	40 CFR 52.21(c)&(d)
7. SO <sub>2</sub>	5 pph <sup>2</sup>	Hourly	FGDRYERS	SC V.1 SC VI.10	R 336.1402, 40 CFR 52.21(c)&(d)
8. SO <sub>2</sub>	21.9 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS	SC VI.11	R 336.1402, 40 CFR 52.21(c)&(d)
9. NO <sub>x</sub>	39.6 pph <sup>2</sup>	Hourly	FGDRYERS	SC V.1 SC VI.10	40 CFR 52.21(c)&(d)
10. NO <sub>x</sub>	173.4 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS	SC VI.11	40 CFR 52.21(c)&(d)



Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
11. CO	147.3 pph <sup>2</sup>	Based on a 24-hour rolling time period	FGDRYERS (At all times (2-unit RTO operation) except during RTO maintenance and washing)	SC VI.6	<b>40 CFR 52.21(d)</b>
12. CO	343.7 pph <sup>2</sup>	Hourly	FGDRYERS (During RTO maintenance and washing (1-unit RTO operation))	SC VI.6	<b>40 CFR 52.21(d)</b>
13. CO	149.8 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS	SC VI.6 SC VI.11	<b>R 336.1205(3), 40 CFR 52.21(d)</b>
14. HCHO	2.4 pph <sup>1</sup>	Hourly	FGDRYERS	SC V.1	<b>R 336.1225</b>
15. Total HAP Measured as THC (as carbon)	90% reduction of total HAP entering the RTO <sup>2</sup>	Hourly	FGDRYERS	SC V.2	<b>40 CFR 63.2270, 40 CFR Part 63, Subpart DDDD</b>
16. VOC (as carbon)	18.6 pph <sup>2</sup>	Per hour, based on a 30-day rolling time period	FGDRYERS	SC VI.6	<b>R 336.1702</b>
17. VOC (as carbon)	81.5 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month	FGDRYERS	SC VI.6 SC VI.11	<b>R 336.1702</b>

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate FGDRYERS unless the WESP and RTO are operating properly, except as provided below in SC III.3.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c)&(d))**
2. The permittee shall not bypass one or both RTO units for more than 3% of the annual operating uptime for FGDRYERS. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c)&(d), 40 CFR 63.2251(b)(1))**
3. The permittee may operate FGDRYERS with only the WESP, or with the WESP and a partially bypassed RTO for necessary maintenance, repair, or parts replacement of the RTO.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c)&(d), 40 CFR 63.2251)**
  - a. When operating FGDRYERS with only the WESP, or the WESP and a partially bypassed RTO, the permittee shall adjust the production rates and/or the amount of pine used, consistent with safe operating practices, to a level necessary to achieve compliance with the PM<sub>10</sub>, VOC, and CO emissions. Also, the VOC and CO emissions shall be measured by the continuous monitoring systems.
  - b. If the hourly and/or yearly PM<sub>10</sub>, VOC, and CO emission limitations for FGDRYERS cannot be achieved, or if continuous monitoring systems are inoperable, then material input feed to FGDRYERS shall cease immediately, consistent with safe operating practices.

- c. Input feed to FGDRYERS shall not restart until the dryer's emission control system and/or continuous monitors system is back on line and functioning properly.
- 4. When burning wood in EUACOEN, exhaust gases from EUACOEN shall be discharged through the WESP and RTO consistent with safe operating procedures.<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c)&(d), 40 CFR 60.47(c)(a))
- 5. When operating FGDRYERS permittee shall maintain the 3-hour block average fire box temperature in the RTO at or above the minimum temperature established during the performance testing in which the THC reduction in the RTO exhaust was above the required 90%.<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 52.21(c) and (d), 40 CFR 63.2262(k), 40 CFR Part 63, Subpart DDDD, Table 2(1))
- 6. The permittee must install, operate, and maintain each temperature monitoring device or other Continuous Parameter Monitoring System (CPMS) according to the following. The CPMS system must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period. At all times, permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. Permittee shall record the results of each inspection, calibration, and validation check.<sup>2</sup> (R 336.1205, R 336.1702, R 336.1910, 40 CFR 52.21(c)&(d), 40 CFR 63.2269(a))

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

- 1. The permittee shall install and operate a COMS at the RTO exhaust to monitor opacity from EUDRYERS and EUACOEN when firing wood. The permittee shall operate the COMS to meet the timelines, requirements and reporting detailed in Appendix 3.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3))
- 2. The permittee shall install, calibrate, maintain, and operate a continuous emission monitoring system at the RTO exhaust for measurement of gas flow, VOC, and CO. The permittee shall operate the COMS to meet the timelines, requirements and reporting detailed in Appendix 3.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3), R 336.1702, 40 CFR 52.21(d))
- 3. The permittee shall install, operate and maintain temperature monitoring devices in a position that provides a representative temperature in the area of the firebox of the RTO that will indicate the actual temperature achieved by the RTO.<sup>2</sup> (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, 40 CFR 63.2269(b), 40 CFR 52.21(c) and (d))
- 4. The CEMS/COMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and the Performance Specifications are located in 40 CFR Part 60, Appendix B.<sup>2</sup> (R 336.1205, R 336.1702, R 336.1910, R 336.2150, R 336.2154, 40 CFR 60.13, 40 CFR 52.21(c) and (d))

See Appendix 3

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- 1. The permittee shall verify the PM10, PM2.5, SO<sub>2</sub>, NO<sub>x</sub>, and Formaldehyde emission rates, in pounds per hour, from FGDRYERS during normal operation, by testing at owner's expense, in accordance with Department requirements, once every five years. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM10/PM2.5	40 CFR Part 51, Appendix M (At the time of issuance of PTI 535-94G, there was not a test method for PM2.5 for wet exhaust streams, such as the dryer exhaust. Therefore, the PM10 test results can be used to satisfy the PM2.5 testing requirement.)
SO <sub>2</sub>	40 CFR Part 60, Appendix A
NO <sub>x</sub>	40 CFR Part 60, Appendix A

Formaldehyde	Method 320 in Appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see 40 CFR 63.14(f)); OR the NCASI Method ISS/FP-A105.01 (IBR, see 40 CFR 63.14(f)); OR ASTM D6348-03 (IBR, see 40 CFR 63.14(b)) provided that percent R as determined in Annex A5 of ASTM D6348-03 is equal or greater than 70 percent and less than or equal to 130 percent.
--------------	--

The hourly emission rate during testing shall be determined by the average of the acceptable test runs performed in accordance with the method requirements. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The plan shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1205, R 336.1225, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21(c)&(d))

2. The permittee shall conduct testing for reduction of total HAP, measured as THC, from FGDRYERS during normal operation, by testing at owner's expense, in accordance with Department requirements, once every five years using the applicable methods specified in Table 4 of 40 CFR Part 63, Subpart DDDD within 5 years following the previous performance test. During the performance test for reduction of total HAP measured as THC, the permittee must continuously monitor the RTO fire box temperature during each of the required 1-hour test runs. The permittee may measure the temperature in multiple locations (e.g., one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for the purposes of establishing your minimum fire box temperature. The minimum fire box temperature must then be established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The plan shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.2001, R 336.2003, R 336.2004, 40 CFR Part 63 Subpart DDDD, Table 2, 40 CFR Part 63 Subpart DDDD, Table 5(2), 40 CFR 63.2262(k))
3. As applicable, the permittee shall perform the Quality Assurance Procedures of the CEMS and COMS set forth in 40 CFR Part 60, Appendix F. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The plan shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3), R 336.1702, 40 CFR 52.21(d), 40 CFR Part 60 Appendix F)

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall complete all required calculations and records by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> (R 336.1205, R 336.1225, R 336.1702, 40 CFR 52.21(c) and (d))
2. The permittee shall monitor and record the volumetric flow rate at the RTO stack, on a continuous basis.<sup>2</sup> (R 336.1205(1)(a), R 336.1205(3), R 336.1702, R 336.1910)

3. The permittee shall continuously monitor and record RTO fire box temperature and Total HAPs as THC in the RTO exhaust at all times that the RTO is controlling the emissions while FGDRYERS is operating. For the purposes of calculating data averages, the permittee must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or quality assurance control activities. The permittee must use all the data collected during all other periods in assessing compliance.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 63.2270(b))**
4. The permittee shall monitor and record FGDRYERS operating time and any time one or both RTO units are bypassed.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 63.2251(b)(3), 40 CFR 63.2281(c)(5)(iii))**
5. The permittee shall keep records of the date, time, duration, and reason for each occurrence of emission control system bypass operation that occurs.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c)&(d))**
6. The permittee shall monitor and record the VOC (as carbon) and CO emissions from FGDRYERS on a continuous basis using CEMS. The permittee shall operate the CEMS to meet the timelines, requirements and reporting detailed in Appendix 3.<sup>2</sup> **(R 336.1205(1)(a), R 336.1205(3), R 336.1702, 40 CFR 52.21(d))**
7. The permittee shall monitor and record the visible emissions from FGDRYERS on a continuous basis.<sup>2</sup> **(40 CFR 60.13, R 336.2150)**
8. The permittee shall utilize RTO firebox temperature as an indicator of the proper functioning of the WESP. The appropriate range of temperature defining proper function of the WESP is determined through stack testing.<sup>2</sup> **(R 336.1205, 40 CFR 52.21(c) and (d), 40 CFR 64.6(c)(1)(i) and (ii))**
9. The permittee shall continuously record RTO firebox temperature from FGDRYERS. Data shall be compiled in the 3-hour block averages and recorded daily.<sup>2</sup> **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) and (d), 40 CFR 63.2269, 40 CFR 64.6(c)(1)(iii))**
10. The permittee shall use the RTO firebox temperature to assure compliance with PM<sub>10</sub> limits. An excursion for PM<sub>10</sub> shall be a 3-hour block average where the average temperature is below the minimum temperature prescribed in the MAP. **(40 CFR 64.6(c)(2))**
11. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64, compliance including data averages and calculations or fulfilling a minimum data availability requirement if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, 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. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
12. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of FGDRYERS 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 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). In response to an excursion as defined in SC VI.9, the permittee shall conduct an investigation and take actions as specified in the AQD approved MAP. **(40 CFR 64.7(d))**

13. The permittee shall, at all times, maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**
14. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**
15. For all pollutants not monitored by CEMS, the permittee shall calculate the emission factors using the most recent stack testing data. These emission factors shall be applied to determine emissions and compliance with emissions limits detailed in the emission limits table (see Appendix 7).<sup>2</sup> **(R 336.1225, R 336.1402, 40 CFR 52.21(c)&(d))**
16. The permittee shall keep in a satisfactory manner, monthly and 12-month rolling time period emission calculation records for CO, SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC (as carbon). The permittee shall keep all records on file at the facility and make them available to the Department upon request (see Appendix 7).<sup>2</sup> **(R 336.1205, R 336.1702, 40 CFR 52.21(c) and (d))**

See Appendices 3 and 7

## **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
6. The permittee must submit a compliance report semiannually. The report shall be received or postmarked by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. The report must contain the information in 40 CFR 63.2281(b).<sup>2</sup> **(40 CFR 63.2281(b) and (c), 40 CFR Part 63, Subpart DDDD, Table 9)**
7. If FGDRYERS has a startup, shutdown, or malfunction during the reporting period that is not consistent with the Startup, Shutdown, or Malfunction Plan (SSMP), the permittee must submit an immediate Startup, Shutdown and Malfunction report by fax, email or telephone within 2 working days after starting actions inconsistent with the plan to the AQD District office. This report shall be followed by a letter within 7 working days after the end of the event. The report shall contain the actions taken for the event and the name, title and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred.<sup>2</sup> **(40 CFR 63.10(d)(5)(ii), 40 CFR Part 63, Subpart DDDD, Table 9)**

8. In accordance with 40 CFR 60.7(c) and (d), an EER and summary report for each CEMS and COMS shall be submitted in an acceptable format to the District Supervisor within 30 days following the end of each calendar quarter. The EER shall include each occurrence of all excursions and the magnitudes of the excess emissions of the specified permit limit, the cause of the excess emissions, if known, periods of monitor downtime, any corrective action taken and the total operating time of the source. If no exceedances or CEMS/COMS downtime occurred during the reporting period, the permittee shall report that fact. An EER report shall be filed for each CEMS and COMS.<sup>2</sup> **(R 336.2170, 40 CFR 60.7(c) and (d), 40 CFR 60.48c(c))**
9. The permittee shall report the results of the quarterly quality assurance procedures of the CEMS/COMS set forth in 40 CFR Part 60, Appendix F within 30 days after the end of each calendar quarter.<sup>2</sup> **(40 CFR Part 60, Appendix F)**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVRTOSTACK	108 <sup>2</sup>	150 <sup>2</sup>	R 336.1225 40 CFR 52.21 (c)&(d)

**IX. OTHER REQUIREMENT(S)**

1. The permittee must develop a written SSMP according to the provisions in 40 CFR 63.6(e)(3).<sup>2</sup> **(40 CFR 63.2250(c))**
2. The permittee must abide by the Routine Control Device Maintenance Device Exemption in SC III.3 approved for the FGDRYERS.<sup>2</sup> **(40 CFR 63.2251)**
3. The permittee shall comply with all applicable requirements in 40 CFR Part 63, Subpart DDDD National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.<sup>2</sup> **(40 CFR Part 63, Subpart DDDD)**
4. 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 AQD and if necessary, submit a proposed modification of the CAM Plan 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 CFR 64.7(e))**
5. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**
6. The permittee shall maintain an AQD approved Monitoring Plan for CEMS and COMS. The Monitoring Plan shall be kept on file and shall include drawings showing locations of all required monitors and lists of replacement parts on hand and descriptions of all required monitors.<sup>2</sup> **(R 336.1205(1)(a), R 336.1205(3), R 336.1702, 40 CFR 52.21(d), 40 CFR 60.13)**

**Footnotes:**

<sup>1</sup>This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup>This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGWOODHANDLING  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Waste material is transferred from flake screening areas, cleanup system for screens and dry bins area, the sanding line, wood handling systems consisting of press board trim line and the area where pressed board is finished to the final product, packaged, and shipped and delivered as dry fuel to the wood burners in EUCOEN and EUDRYER1 through EUDRYER4. This is a pneumatic system with dust pickups servicing screens, conveyors, dry bins, and associated equipment for housekeeping purposes. PTI Nos.: 535-94, 535-94A, 16-12, 140-14.

**Emission Unit:** EUFLAQ, EUFINISHING, EUMATTRIM, EUCLEANUP, EUDRYFUEL, EUBLENDVENT

**POLLUTION CONTROL EQUIPMENT**

Cyclones and Baghouse

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.002 lbs Per 1,000 lbs of dry exhaust gases <sup>2</sup>	NA	FGWOODHANDLING	SC VI.2 SC VI.3 SC VI.4	40 CFR 52.21(j)
2. PM	1.86 pph <sup>2</sup>	NA	FGWOODHANDLING	SC VI.2 SC VI.3 SC VI.4	40 CFR 52.21(j)
3. PM	8.1 tpy <sup>2</sup>	NA	FGWOODHANDLING	SC VI.2 SC VI.3 SC VI.4	40 CFR 52.21(j)
4. Visible emissions	5% opacity <sup>2</sup>	6-minute average	FGWOODHANDLING	SC VI.4	40 CFR 52.21(j) R 336.1331 R 336.2803 R 336.2804
5. PM <sub>10</sub>	0.41 pph <sup>2</sup>	NA	EUBLENDVENT	SC VI.3 SC VI.4	40 CFR 52.21 (c) and (d) R 336.2803 R 336.2804
6. PM <sub>2.5</sub>	0.41 pph <sup>2</sup>	NA	EUBLENDVENT	SC VI.3 SC VI.4	40 CFR 52.21 (c) and (d) R 336.2803 R 336.2804

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

### **III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall not operate FGWOODHANDLING unless the associated cyclones and baghouses are maintained and operated in a satisfactory manner. Satisfactory operation includes, but is not limited to, maintaining a pressure drop across the baghouses in accordance with the manufacturer's specifications.<sup>2</sup> **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d), R 336.2803, R 336.2804)**
2. The permittee shall not operate FGWOODHANDLING unless a gauge, which measures the pressure drop across each baghouse, is maintained and operated in a satisfactory manner.<sup>2</sup> **(R 336.1301, R 336.1331, R 336.1910, 40 CFR 52.21(c) and (d), R 336.2803, R 336.2804)**

### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. FGWOODHANDLING shall be equipped with cyclones and baghouses.<sup>2</sup> **(40 CFR 52.21(j))**
2. The permittee shall install a gauge, which measures the pressure drop across each baghouse. **(R 336.1213(3))**

### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall complete all required calculations and records by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1301, R 336.1331, R 336.1910, R 336.2803, 40 CFR 52.21(c) and (d), R 336.2804)**
2. The permittee shall calculate the PM emissions per the formula found in Appendix 7. **(R 336.1213(3))**
3. The permittee shall monitor continuously and record once daily, the pressure drop across each baghouse in FGWOODHANDLING on a continuous basis. **(R 336.1213(3))**
4. The permittee shall monitor the baghouse to verify it is operating properly, by taking 6 minute visible emission readings for FGWOODHANDLING a minimum of once per calendar day when the equipment is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If any visible emissions (other than uncombined water vapor) are observed, the permittee shall immediately inspect the baghouse and perform any required maintenance.<sup>2</sup> **(R 336.1301, R 336.1910)**
5. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGWOODHANDLING. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, and status of visible emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request.<sup>2</sup> **(R 336.1301, R 336.1303, R 336.1910)**

See Appendix 7

### **VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**



3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBLENDVENT	35 <sup>2</sup>	60 <sup>2</sup>	<b>R 336.1225</b> <b>40 CFR 52.21(c) and (d)</b> <b>R 336.2803</b> <b>R 336.2804</b>

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGDIESEL-ENGINES  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Emergency diesel-fired engines used during power outages to circulate hot oil for the press and building heat at the facility, to supply emergency electricity, and to pump water during fires. Diesel emergency hot oil pump (85 HP), Diesel emergency generator (250 HP), Diesel emergency fire pump (281HP).  
 Permit to Install: 535-94.

**Emission Unit:** EUDIESELHOTOIL, EUEMERGENCYGEN, EUFIREPUMP

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Diesel Fuel (No. 1 or 2 only)	0.5% sulfur maximum <sup>2</sup>	Test Protocol	FGDIESEL- ENGINES	SC V.1	<b>40 CFR52.21(j)</b>

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee may operate the diesel engines during the following scenarios besides testing:
  - a. The permittee may operate EUDIESELHOTOIL and EUEMERGENCYGEN as needed when normal process equipment is not operating properly.<sup>2</sup> **(40 CFR 52.21(j))**
  - b. The permittee may operate EUFIREPUMP at any time to help combat fires.<sup>2</sup> **(40 CFR 52.21(j))**
2. The permittee shall not operate each diesel engine for more than 100 hours per year for diesel engine testing.<sup>2</sup> **(40 CFR 52.21(j))**
3. The permittee may operate FGDIESEL-ENGINES as necessary during emergencies with no time limit. **(40 CFR 63.6640(f)(1))**
4. The permittee may operate FGDIESEL-ENGINES for any combination of the following purposes for a maximum of 100 hours per calendar year. **(40 CFR 63.6640(f)(2))**
  - a. Maintenance checks and readiness testing provided that the tests are recommended by federal, state, or local government, the engine manufacturer, vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with FGDIESEL-ENGINES. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of FGDIESEL-ENGINES beyond 100 hours per calendar year.

5. The permittee may operate FGDIESEL-ENGINES for up to 50 hours per engine per year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours of operation allowed under SC III.2. **(40 CFR 63.6640(f)(3))**
6. The permittee shall operate and maintain FGDIESEL-ENGINES according to the manufacturer's emission-related written instructions or develop a 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 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6, Item 9)**
7. The permittee shall comply with the following operational requirements:
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.6.
  - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If FGDIESEL-ENGINES is being operated during an emergency and it is not possible to shut down FGDIESEL-ENGINES to perform the work practice standards on the schedule required, 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 standard 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. **(40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ Table 2c, Item 1)**

8. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in SC III.7. The oil analysis must be performed at the same frequency as specified for changing the oil in SC III.7. The analysis program must at a minimum analyze the Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:
  - a. Total Base Number is less than 30% of the Total Base Number of the oil when new;
  - b. Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or
  - c. Percent water content (by volume) is greater than 0.5.

If none of these condemning limits are exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The analysis program must be part of a maintenance plan for FGDIESEL-ENGINES. **(40 CFR 63.6625(i))**

9. The permittee shall minimize FGDIESEL-ENGINES's time spent at idle during startup and minimize the FGDIESEL-ENGINES's startup time to a period needed for appropriate and safe loading of FGDIESEL-ENGINES, not to exceed 30 minutes. **(40 CFR 63.6625(h))**
10. The permittee must be in compliance with the operating limitations in this subpart that apply to FGDIESEL-ENGINES at all times. **(40 CFR 63.6605(a))**
11. The permittee shall operate and maintain FGDIESEL-ENGINES in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee 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 FGDIESEL-ENGINES. **(40 CFR 63.6605(b))**

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall equip and maintain FGDIESEL-ENGINES with a non-resettable hour meter. **(40 CFR 63.6625(f))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

NA

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall keep the following records: **(40 CFR 63.6655)**
  - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance status, according to the requirements of 40 CFR 63.10(b)(2)(xiv).
  - b. Records of the occurrence and duration of each malfunction of FGDIESEL-ENGINES.
  - c. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning equipment to its normal or usual manner of operation.
  - d. Records to demonstrate continuous compliance with operating limitations in SC III.4.
  - e. Records of the maintenance conducted on FGDIESEL-ENGINES in order to demonstrate that FGDIESEL-ENGINES is operated and maintained according to the maintenance plan.
  - f. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation; including what classified the operation as emergency and how many hours were spent during non-emergency operation.
2. The permittee must keep records of the parameters that are analyzed as part of the oil analysis program in SC III.8, the results of the analysis, and the oil changes for FGDIESEL-ENGINES. **(40 CFR 63.6625(i))**

**VII. REPORTING**

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 01 to December 31 and September 15 for reporting period January 01 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. As specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ. **(40 CFR Part 63, Subparts A and ZZZZ)**

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

<sup>2</sup> This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

## E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUCOEN	40 CFR Part 63, Subpart DDDDD	EUCOEN is exempted from the Subpart pursuant to 40 CFR 63.7491(h). This only applies when the emission unit is firing on wood fuel.

## APPENDICES

### Appendix 1. Abbreviations and Acronyms

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
CO <sub>2e</sub>	Carbon Dioxide Equivalent	ng	Nanogram
COM	Continuous Opacity Monitoring	PM	Particulate Matter
Department/ department	Mich. Department of Environmental Quality	PM <sub>2.5</sub>	Particulate Matter equal to or less than 2.5 microns in diameter
dscf	Dry standard cubic foot	PM <sub>10</sub>	Particulate Matter equal to or less than 10 microns in diameter
dscm	Dry standard cubic meter	pph	Pound per hour
USEPA	U. S. Environmental Protection Agency	ppm	Parts per million
EU	Emission Unit	ppmv	Parts per million by volume
°F	Degrees Fahrenheit	ppmw	Parts per million by weight
FG	Flexible Group	PS	Performance Specification
GACS	Gallon of Applied Coating Solids	PSD	Prevention of Significant Deterioration
GC	General Condition	psia	Pounds per square inch absolute
GHGs	Greenhouse Gases	psig	Pounds per square inch gauge
gr	Grains	PTE	Permanent Total Enclosure
HAP	Hazardous Air Pollutant	PTI	Permit to Install
Hg	Mercury	RACT	Reasonable Available Control Technology
hr	Hour	ROP	Renewable Operating Permit
HP	Horsepower	SC	Special Condition
H <sub>2</sub> S	Hydrogen Sulfide	scf	Standard cubic feet
HVLP	High Volume Low Pressure *	sec	Seconds
ID	Identification	SCR	Selective Catalytic Reduction
IRSL	Initial Risk Screening Level	SO <sub>2</sub>	Sulfur Dioxide
ITSL	Initial Threshold Screening Level	SRN	State Registration Number
kW	Kilowatt	TEQ	Toxicity Equivalence Quotient
LAER	Lowest Achievable Emission Rate	TAC	Toxic Air Contaminant
lb	Pound	Temp	Temperature
m	Meter	THC	Total Hydrocarbons
MACT	Maximum Achievable Control Technology	tpy	Tons per year
MAERS	Michigan Air Emissions Reporting System	µg	Microgram
MAP	Malfunction Abatement Plan	µm	Micrometer or Micron
MDEQ	Mich. Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

## Appendix 2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

## Appendix 3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EUPRESSLINE

**For an existing CERMS: If the permittee has satisfied the installation and testing requirements, Items 1 thru 4 do not apply.**

1. Within 30 calendar days after commencement of trial operation, the permittee shall submit two copies, one to the Technical Programs Unit Supervisor and one to the District Supervisor, of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required CERMS.
2. Within 150 calendar days after commencement of trial operation, the permittee shall submit two copies of a complete test plan for the CERMS to the AQD for approval.
3. Within 180 calendar days after commencement of trial operation, the permittee shall complete the installation and testing of the CERMS.
4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the CEMS complies with the requirements of the corresponding Performance Specifications (PS) in the following table.

Pollutant	Applicable PS
CO	4
VOC	8

5. The CERMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 6 of Appendix B to 40 CFR Part 60.
6. Each calendar quarter, the permittee shall perform the Quality Assurance Procedures of the CERMS set forth in Appendix F of 40 CFR Part 60. Within 30 days following the end of each calendar quarter, the permittee shall submit the results to the AQD in the format of the data assessment report (Figure 1, Appendix F).
7. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to the AQD, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
  - a. A report of each exceedance above the VOC limit specified in the conditions of this permit. This includes the date, time, magnitude, cause and corrective actions of all occurrences during the reporting period. A report of all periods of CERMS downtime and corrective action.
  - c. A report of the total operating time of the EUPRESSLINE during the reporting period.
  - d. A report of any periods that the CERMS exceeds the instrument range.
  - e. If no exceedances or CERMS downtime occurred during the reporting period, the permittee shall report that fact.

The permittee shall keep all monitoring data on file for a period of at least five years and make them available to the AQD upon request.



**For an existing COMS: If the permittee has satisfied the installation and performance specification requirements, Items 1 – 4 do not apply.**

1. Within 30 calendar days of the issuance of this permit, the permittee shall submit two copies of a Monitoring Plan to the AQD, for review and approval. The Monitoring Plan shall include drawings or specifications showing proposed locations and descriptions of the required COMS.
2. Within 150 calendar days of the issuance of this permit, the permittee shall submit two copies of a complete test plan for the COMS to the AQD for approval.
3. Within 180 calendar days of the issuance of this permit, the permittee shall complete the installation and testing of the COMS.
4. Within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating the COMS complies with the requirements of Performance Specification (PS) 1.
5. The COMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and PS 1 of Appendix B, 40 CFR Part 60.
6. The permittee shall perform the COMS quality assurance set forth in 40 CFR Part 60, Appendix F, Procedure 3, or a method acceptable to AQD. Within 30 days after the completion of the Procedure 3, the results shall be submitted to the AQD.
7. In accordance with 40 CFR 60.7(c) and (d), the permittee shall submit two copies of an excess emission report (EER) and summary report in an acceptable format to Air Quality Division, within 30 days following the end of each calendar quarter. The Summary Report shall follow the format of Figure 1 in 40 CFR 60.7(d). The EER shall include the following information:
  - a. A report of each exceedance above the opacity limit. This includes the date, time, magnitude, cause, and corrective actions of all occurrences during the reporting period.
  - b. A report of all periods of COMS downtime and corrective action.
  - c. A report of the total operating time of the FGDRYERS during the reporting period.
  - d. If no exceedances or COMS downtime occurred during the reporting period, the permittee shall report that fact.

All monitoring data is shall be kept on file for a period of at least five (5) years and made available to the AQD upon request.

#### **Appendix 4. Recordkeeping**

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### **Appendix 5. Testing Procedures**

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

#### **Appendix 6. Permits to Install**

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B7302-2010. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (\*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B7302-2010a is being reissued as Source-Wide PTI No. MI-PTI-B7302-2016

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
16-12	201200087	Addition of EUBLENDVENT	EUBLENDVENT
140-14	201400146*	Miscellaneous changes to a previous PTI (16-12) to more accurately reflect equipment installed on EUBLENDVENT.	FGWOODHANDLING
13-15	201400146*	Removal of greenhouse gas emissions limit from Source Wide Conditions pursuant to the expiration of the biogenic deferral.	Source Wide Conditions

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B7302-2016.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600150 / November 15, 2016	Remove PM Emission Limit for EUCOEN in Section I Emission Limits, in FGDRYERS and the testing requirement to test EUCOEN for PM, since the Emission Unit is not subject to 40 CFR Part 60, Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.	FGDRYERS
535-94F	201700114 / December 1, 2017	Incorporate PTI 535-94F, which replaces the existing board press with a new press that is the same size. The new press will be controlled by the existing biofilter and press enclosure and exhaust through the existing stack.  In addition, Weyerhaeuser requested to increase the press PM10 emission limit from 8.4 lb/hr to 10.5 lb/hr to provide a safety factor.  Weyerhaeuser also requested to reduce the press formaldehyde emission limit from 2.3 lb/hr to 1.0 lb/hr.	EUPRESSLINE
535-94G	201800156 / April 5, 2019	Incorporate PTI 535-94G, which replaces four former dryers with four new dryers. The new dryers have slightly larger burners that will exhaust to the existing control equipment. The dryers are listed under the same names as the former dryers, but the Modification/Installation date has been updated in the Emission Unit Summary Table. The new dryers will be controlled by the existing wet electrostatic precipitator (WESP) and two	FGDRYERS

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
		regenerative thermal oxidizer (RTOs) and exhaust through the existing stack.	

## Appendix 7. Emission Calculations

The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in:

### A. EUPAINTBOOTH

- Calculate the **hourly** emissions of particulate matter emission on a monthly average for EUPAINTBOOTH using the following formula:

$$\frac{[\text{Paint Usage (gal/month)} * \text{Density (lbs/gal)} * \% \text{ solids} * (1 - 0.75) \text{ Transfer} * (1 - 0.96) \text{ Control Efficiency}]}{\text{Hours of operation each month}} = \text{Pounds per hour of particulate emissions}$$

- Calculate the **yearly** emissions of particulate matter emission for EUPAINTBOOTH using the following formula:

$$[\text{Paint Usage (gal/year)} * \text{Density (lbs/gal)} * \% \text{ solids} * (1 - 0.75) \text{ Transfer} * (1 - 0.96) \text{ Control Efficiency}] * (1 \text{ Ton} / 2000 \text{ pounds}) = \text{Tons of emissions per year}$$

### B. EUPRESSLINE

- Calculate the **monthly** emissions for CO using the following formula:

$$(\text{EF}) * (\text{tons of wood processed each month}) * (1 \text{ Ton} / 2000 \text{ pounds}) = \text{Tons of CO emissions per calendar month}$$

EF = Emission Factor determined by the most recent stack test, in pounds of pollutant per ton of wood processed; the emission factor shall take in account resin and wax usage.

- Calculate the most recent **12-month rolling time period emissions** for CO using the following formula:

$$\sum (\text{tons of CO emissions for the most recent 12-months}) = \text{12-month rolling time period emissions}$$

- When the **bio-filter unit** is being bypassed as allowed in EUPRESSLINE SC III.3, the VOC emission rate shall be calculated as follows:

$$\text{Pounds of VOC emitted per hour} = \frac{[(x)(y)2.4 \text{ lbs. VOC/ ton pine}] + [(x)(1-y)0.5 \text{ lbs. VOC/ton hardwood}]}{(\text{operating hours per day during bypass})}$$

Where: x = tons of finished product produced per day during bypass

y = percent pine

1-y = percent hardwood (total less percentage of pine)

### C. FGDRYERS

- Calculate the **hourly** emissions for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and Formaldehyde using the following formula:

$$(\text{EF}) * (\text{tons of wood processed per month}) / (\text{hours of operation in given month}) = \text{Pounds of pollutant emitted per hour}$$

EF = Emission Factor determined by the most recent stack test, in pounds of pollutant per ton of wood processed.

- Calculate the **12-month rolling** time period emissions for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub>, using the following formula:

**(EF)\*(tons of wood processed per month) = Pounds of pollutant emitted per month / 2000 for tons of pollutant each month**

EF = Emission Factor determined by the most recent stack test, in pounds of pollutant per ton of wood processed.

- **For PM<sub>10</sub>** and PM<sub>2.5</sub> separate calculations should be made each month for hours of operation with full **2-unit RTO** operation, and hours of operation with **1-unit RTO** operation using the appropriate emission factors determined after the most recent stack tests. Then these emissions should be added together each month for the monthly emissions.

During periods of **1-unit RTO** operation, the PM<sub>10</sub> and PM<sub>2.5</sub> emission rates shall be calculated as follows:

**Total pounds of PM<sub>10</sub> and PM<sub>2.5</sub> emitted = Dryer Hours of Operation \* (Number of Dryers in Operation/4) \* 56.6 lbs/hr**

- The summation of the most recent 12-month total:

**∑ (tons of pollutant emissions for the most recent 12-months) = 12 month rolling time period**

#### **D. FGWOODHANDLING**

- The following emission calculation shall be used to determine emission rates for PM.

**129,100 \* 0.075 lbs gas /ft3 \* 60 min/hr \* 0.002 lb PM/ 1000 lbs gas = lbs/hr**

Annual emissions are calculated by applying this emission factor to the total hours of operation each month.

### **Appendix 8. Reporting**

#### **A. Annual, Semiannual, and Deviation Certification Reporting**

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

#### **B. Other Reporting**

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.