

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION**

MARCH 23, 2021

**PERMIT TO INSTALL  
59-16G**

**ISSUED TO  
ARAUCO NORTH AMERICA**

**LOCATED AT  
5851 ARAUCO ROAD  
GRAYLING, MICHIGAN 49738**

**IN THE COUNTY OF  
CRAWFORD**

**STATE REGISTRATION NUMBER  
P0699**

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

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>March 19, 2021</b>	
DATE PERMIT TO INSTALL APPROVED: <b>March 23, 2021</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

## PERMIT TO INSTALL

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## COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

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

## POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

### EMISSION UNIT SPECIAL CONDITIONS

#### EMISSION UNIT SUMMARY TABLE

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

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUDEBARK	Debarking and Chipping. Emissions are fugitive.	4/24/19	FGFUGITIVES
EUWOODSTORAGE	Raw material storage and transfer. Includes handling of logs and chips. Emissions are fugitive.	4/24/19	FGFUGITIVES
EUBB	Bark Shredder. Emissions are fugitive.	4/24/19	FGFUGITIVES
EUBARKSTG	Conveyance of material to bark storage. Emissions are controlled by baghouse BH14B.	4/24/19	FGMTRLHNDL
EUFLAKERS	Seven (7) green flakers. Emissions controlled by baghouse BH04 and the Thermal Energy Plant dry electrostatic precipitator (DESP1) and the dryer thermal oxidizer (RTO1) when the dryers are operating	4/24/19	FGDRYERRTO, FGPCWPMACT
EUENERGY	Thermal Energy Plant. Combusts wood derived fuel (such as sander dust, fines from screening, material from the board breaker, and material reject) and clean cellulosic biomass (such as, but not limited to, bark). Emissions are controlled by a dry electrostatic precipitator (DESP1) and exhaust is then routed to the dryers as make up air before exhausting through the dryer RTO (RTO1), except during bypass of RTO1 and DESP1. Propane and/or diesel fuel is used for startup.	4/24/19	FGDRYERRTO, FGPCWPMACT
EUDRYER1	Rotary Green Dryer, natural gas-fired. Receives heated makeup air from the Thermal Energy Plant. Emissions controlled by RTO1.	4/24/19	FGDRYERRTO, FGPCWPMACT
EUDRYER2	Rotary Green Dryer, natural gas-fired. Receives heated makeup air from the Thermal Energy Plant. Emissions controlled by RTO1.	4/24/19	FGDRYERRTO, FGPCWPMACT
EUFINES	Conveyance of fines from screening to Energy Plant Dust Silo. Emissions are controlled by baghouse BH20.	4/24/19	FGMTRLHNDL
EUOVERS1	Overs mill No. 1. Emissions controlled by baghouse BH05.	4/24/19	FGMTRLHNDL
EUOVERS2	Overs mill No. 2. Emissions controlled by baghouse BH05.	4/24/19	FGMTRLHNDL
EUOVERS3	Overs mill No. 3. Emissions controlled by baghouse BH05.	4/24/19	FGMTRLHNDL
EUSIFTER	Core & Surface Sifter/Shaker. Emissions controlled by baghouse BH08.	4/24/19	FGMTRLHNDL
EUCHEMICAL	Chemical Storage Tanks (includes resins). Tanks are 20,000 gallons or smaller. Emissions are uncontrolled and indoor fugitive.	4/24/19	FGTANKS
EUBLENDING	Core and Surface Blending. Emissions controlled by baghouse BH12.	4/24/19	FGBLNDFRM

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EUFORMING	Core and Surface Forming. Emissions controlled by two baghouses, BH11 and BH13.	4/24/19	FGBLNDFRM
EUPRESS	Continuous Press. Particulate emissions are controlled by wet scrubber (WS01).	4/24/19	FGPRESSCOOL, FGPCWPMACT
EUTOH	Thermal oil heater for press and sifter. Combusts natural gas only.	4/24/19	FGTOH, FGBOILERMACT
EUFCOS	Flying cutoff saw. Emissions controlled by baghouse BH17.	4/24/19	FGFINISH
EURMSILO	Conveyance of material from material reject and board breaking to Raw Material Sawdust Silo. Emissions are controlled by a baghouse BH14A.	4/24/19	FGFINISH
EUCOOLING	Board cooling system. Particulate emissions are controlled by wet scrubber (WS01).	4/24/19	FGPRESSCOOL, FGPCWPMACT
EUSANDING	Sanding operations. Emissions are controlled by a baghouse BH18.	4/24/19	FGFINISH
EUCTPSAW	Cut to panel saw line. Emissions are controlled by a baghouse BH19.	4/24/19	FGFINISH
EUUFRESIN	Four (4) urea formaldehyde (UF) resin tanks for the paper treating lines.	4/24/19	FGTANKS
EUMRESIN	Four (4) melamine resin tanks for the paper treating lines.	4/24/19	FGTANKS
EUTFL1	Thermally fused lamination line No. 1. Emissions are controlled by a baghouse BH28.	4/24/19	FGTFL
EUTFL2	Thermally fused lamination line No. 2. Emissions are controlled by a baghouse BH29.	4/24/19	FGTFL
EUTFL3	Thermally fused lamination line No. 3. Emissions are controlled by a baghouse BH30.	TBD	FGTFL
EUTFLTOS1	Thermal oil system for thermally fused lamination lines. Combusts natural gas only.	4/24/19	FGTOH, FGBOILERMACT
EUEMRGRICE1	Emergency diesel generator engine, 1500-kw.	4/24/19	FGRICE
EUEMRGRICE2	Emergency diesel generator engine, 568-kw.	4/24/19	FGRICE
EUFIREPUMP	Diesel fire pump engine, 187-kilowatt.	4/24/19	FGRICE
EUDIESEL	Four (4) diesel storage tanks for emergency engines, fire pump and mobile equipment.	4/24/19	FGTANKS
EULPTANKS	Two (2) pressurized liquid propane (LP) tanks used for mobile equipment.	4/24/19	FGTANKS
EUROADS	Vehicle traffic on facility road. Road are paved. Emissions are controlled by wetting and/or sweeping.	4/24/19	FGFUGITIVES
EUMU-01	Makeup air direct gas heating unit in the glue, forming, and pre-press area, 4.55 MM Btu/hr.	4/24/19	FGAMU
EUMU-02	Makeup air direct gas heating unit in the glue, forming, and pre-press area, 4.55 MM Btu/hr.	4/24/19	FGAMU
EUMU-03	Makeup air direct gas heating unit in the glue, forming, and pre-press area, 4.55 MM Btu/hr.	4/24/19	FGAMU
EUMU-04	Makeup air direct gas heating unit in the press, dryer, and cooling area, 3.51 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-05	Makeup air direct gas heating unit in the press, dryer, and cooling area, 3.51 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-06A	Makeup air direct gas heating unit in the sanding, finish, and storage, 2.5 MM Btu/hr.	4/24/19 6/30/19	FGAMU

<b>Emission Unit ID</b>	<b>Emission Unit Description (Including Process Equipment &amp; Control Device(s))</b>	<b>Installation Date / Modification Date</b>	<b>Flexible Group ID</b>
EUMU-06B	Makeup air direct gas heating unit in the sanding, finish, and storage, 2.5 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-07	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-08	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-09	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-10	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-11	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-12	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-13	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-14	Makeup air direct gas heating unit in the sanding, finish, and storage, 5.0 MM Btu/hr.	4/24/19 6/30/19	FGAMU
EUMU-15	Makeup air direct gas heating unit in the wet exhaust room, 0.1 MM Btu/hr.	4/24/19	FGAMU
EUAHU-01	Air handling indirect gas heating unit, lockers and bathrooms, office building. 0.5 MM Btu/hr.	4/24/19	FGAMU
EUAHU-02	Air handling indirect gas heating unit, maintenance main workshop, 1.2 MM Btu/hr.	4/24/19	FGAMU
EUAHU-03	Air handling direct gas heating unit, spare parts warehouse, 1.14 MM Btu/hr.	4/24/19	FGAMU
EUAHU-04	Air handling indirect gas heating unit, maintenance shop and bathrooms, 0.3 MMBtu/hr.	4/24/19	FGAMU

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

**EUFLAKERS  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

Seven (7) green flakers. Emissions are controlled by baghouse BH04. While the dryer is operating, emissions are also controlled by the Thermal Energy Plant dry electrostatic precipitator (DESP1) and the dryer thermal oxidizer (RTO1).

**Flexible Group ID:** FGDRYERRTO, FGPCWPMACT.

**POLLUTION CONTROL EQUIPMENT**

Baghouse BH04, DESP1, and thermal oxidizer RTO1.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC	76 lb/hr	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1	R 336.1225, R 336.1702(a), R 336.2810
2. PM	1.01 lb/hr	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1, SC VI.2	R 336.2810
3. PM	0.002 gr/dscf	Hourly	EUFLAKERS during bypass of RTO1	SC V.1, SC VI.2	R 336.1331
4. PM10	1.01 lb/hr	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
5. PM2.5	1.01 lb/hr	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
6. Formaldehyde	0.012 lb/hr <sup>1</sup>	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1	R 336.1225(3)
7. Acetaldehyde	0.27 lb/hr <sup>1</sup>	Hourly	EUFLAKERS during bypass of DESP1 and RTO1	SC V.1	R 336.1225(2)
8. Opacity	10%	6-minute average	EUFLAKERS during bypass of DESP1 and RTO1	SC VI.4	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

- The permittee shall not operate EUFLAKERS for more than 460 hours per 12-month rolling time period as determined at the end of each calendar month, when emissions are not controlled by DESP1 and RTO1. (R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)

2. The permittee shall not operate EUFLAKERS unless a minimum temperature in RTO1, as determined during the most recent performance test and documented in the MAP, is maintained, except as specified in SC III.1. Monitoring and record keeping requirements for RTO1 are specified in the FGDRYERRTO Special Conditions. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate EUFLAKERS unless baghouse BH04 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. **(R 336.1205, R 336.1301, R 336.1331, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
2. Except as allowed by SC III.1, the permittee shall not operate EUFLAKERS unless thermal oxidizer RTO1 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight) and maintaining a minimum temperature as determined during the most recent performance test and documented in the MAP. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
3. Except as allowed by SC III.1, the permittee shall not operate EUFLAKERS unless dry electrostatic precipitator DESP1 is installed, maintained, and operated in a satisfactory manner as described in the MAP. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
4. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a pressure drop monitoring device on baghouse BH04. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
5. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the time and duration of each bypass of thermal oxidizer RTO1. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, R 336.2810)**

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC, PM, PM10, PM2.5, formaldehyde<sup>1</sup>, and/or acetaldehyde<sup>1</sup> emission rates from EUFLAKERS, prior to DESP1, by testing at owner's expense, in accordance with Department requirements. 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
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

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. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.2803, R 336.2804, R 336.2810)**
2. The permittee shall monitor the baghouse BH04 pressure drop on a continuous basis. Whenever EUFLAKERS is operating and emissions are not controlled by DESP1 and RTO1, the permittee shall record the BH04 pressure drop at least once per day. Whenever EUFLAKERS is operating and emissions are controlled by DESP1 and RTO1, the permittee shall record the BH04 pressure drop at least once per week. If the pressure drop is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
3. The permittee shall monitor and record, in a satisfactory manner, the time and duration of each bypass of thermal oxidizer RTO1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, R 336.2810)**
4. The permittee shall monitor EUFLAKERS to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar day during daylight hours for any bypass of RTO1 exceeding two hours. Either a certified or non-certified reader shall take each visible emission reading. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
5. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for EUFLAKERS. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**

## **VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the EUFLAKERS emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. This demonstration will be used when emissions are not controlled by DESP1 and RTO1. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

## **VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-04	49.2	65.6	R 336.1225, R 336.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

## **EUENERGY EMISSION UNIT CONDITIONS**

### **DESCRIPTION**

Thermal Energy Plant. Combusts wood derived fuel (such as sander dust, fines from screening, material from the board breaker, and material reject) and clean cellulosic biomass (such as, but not limited to, bark). Emissions are controlled by a dry electrostatic precipitator (DESP1) and exhaust is then routed to the dryers as make up air before exhausting through the dryer RTO (RTO1), except during bypass of RTO1 and DESP1. Propane and/or diesel fuel is used for startup.

**Flexible Group ID:** FGDRYERRTO, FGPCWPMACT.

### **POLLUTION CONTROL EQUIPMENT**

Dry electrostatic precipitator (DESP1) and thermal oxidizer RTO1.

### **I. EMISSION LIMITS**

1. The permittee shall minimize emissions as described in the startup, shutdown, and malfunction plan. **(R 336.1225, R 336.1702, R 336.1912, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

### **II. MATERIAL LIMITS**

1. The permittee shall only burn wood derived fuel (such as sander dust, fines from screening, material from the board breaker, and material reject) and clean cellulosic biomass (such as, but not limited to, bark), as defined by the Wood Fuel Procurement and Monitoring Plan (WFPMP), in EUENERGY. The WFPMP shall include provisions to prevent the burning of chemically treated wood, construction/demolition wood waste, and other inappropriate materials. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Except as specified in SC III.5, the permittee shall immediately cease the input feed of materials to EUENERGY, consistent with safe operating procedures, upon initiation of bypass of thermal oxidizer RTO1 or DESP1. Input feed of materials to EUENERGY shall not restart until RTO1 and DESP1 are back online and operating in a satisfactory manner, as described in the MAP. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
2. Except as specified in SC III.5, the permittee shall not operate EUENERGY unless a minimum temperature in RTO1, as determined during the FGDRYERRTO most recent performance test and documented in the MAP, is maintained. Monitoring and record keeping requirements for RTO1 are specified in the FGDRYERRTO Special Conditions. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
3. Except as specified in SC III.5, the permittee shall not operate EUENERGY unless the secondary voltage or total power in DESP1 is maintained, as described in the MAP. **(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
4. The permittee shall not operate EUENERGY unless a WFPMP has been submitted to, and approved by, the AQD District Supervisor not less than 60 days before startup of EUPRESS, as defined under 40 CFR 63.2292, and is being followed at all times. The permittee shall amend the WFPMP within 45 days if any changes are deemed necessary or upon request by the AQD District Supervisor. The permittee shall submit the WFPMP and any amendments to the AQD District Supervisor for review and approval. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

5. The permittee may operate EUENERGY during bypass of RTO1 and DESP1 under the following conditions: **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
- The maximum heat input capacity does not exceed a maximum of 25 MMBTU per hour on a fuel heat input basis
  - The permittee shall not burn any wood derived fuel or clean cellulosic biomass using the dust burners during bypass of RTO1 and DESP1
  - Total bypass of RTO1 and DESP1 shall not exceed 500 hours per 12-month rolling time period, as determined at the end of each calendar month
  - The permittee shall immediately commence shut down of EUFLAKERS, EUOVERS1, EUOVERS2, EUOVERS3, EUSIFTER, EUFORMING, EUBLENDING, EUPRESS, EUCOOLING and EUFCOS upon initiation of bypass of RTO1 and DESP1

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

- Except as specified in SC III.5, the permittee shall not operate EUENERGY unless RTO1 and DESP1 are installed, maintained, and operated in a satisfactory manner as described in the MAP. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
- The maximum design heat input capacity for EUENERGY shall not exceed a maximum of 110 MMBTU per hour on a fuel heat input basis. **(R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))**
- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a secondary voltage monitoring device or a total power monitoring device on DESP1 to monitor and record the secondary voltage or total power on a continuous basis in accordance with the MAP. **(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

- 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. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.2803, R 336.2804, R 336.2810)**
- The permittee shall monitor and record, in a satisfactory manner, secondary voltage or total power, on a continuous basis, while exhaust from EUENERGY is routed to DESP1. Secondary voltage or total power data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. If the voltage is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
- The permittee shall monitor and record, in a satisfactory manner, the time and duration of each bypass of thermal oxidizer RTO1 and DESP1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, R 336.2810)**
- The permittee shall keep daily records of the amount of wood derived fuel (such as sander dust, fines from screening, material from the board breaker, and material reject) and clean cellulosic biomass (such as, but not limited to, bark) burned in EUENERGY. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

5. The permittee shall calculate the VOC, PM, PM10, and PM2.5 emissions from EUENERGY due to bypass of RTO1 and DESP1 for each bypass event, using emission factors acceptable to the AQD District Supervisor, each calendar month, and each 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
6. The permittee shall monitor and record, in a satisfactory manner, the time and duration of each bypass of RTO1 and DESP1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
7. The permittee shall monitor and record, in a satisfactory manner, the total heat input to EUENERGY during bypass of RTO1 and DESP1 on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

## **VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used during bypass events. The compliance demonstration method shall include the emission factors used and calculation examples. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

## **VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. Bypass Stack 1	51	101	R 336.1225, R 336.2803, R 336.2804
2. Bypass Stack 2	72	90	R 336.1225, R 336.2803, R 336.2804

## **IX. OTHER REQUIREMENTS**

NA

### **Footnotes:**

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

**FLEXIBLE GROUP SPECIAL CONDITIONS**

**FLEXIBLE GROUP SUMMARY TABLE**

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

<b>Flexible Group ID</b>	<b>Flexible Group Description</b>	<b>Associated Emission Unit IDs</b>
FGFUGITIVES	Fugitive emission sources at the facility.	EUROADS, EUDEBARK, EUWOODSTORAGE, EUBB
FGDRYERRTO	Process equipment normally exhausted through the dryer RTO (RTO1).	EUFLAKERS, EUDRYER1, EUDRYER2, EUENERGY
FGMTRLHNDL	Material handling sources at the facility with emissions controlled by baghouses.	EUOVERS1, EUOVERS2, EUOVERS3, EUFINES, EUSIFTER, EUBARKSTG
FGBLNDFRM	Blending and forming operations. Emissions are controlled by baghouses.	EUBLENDING, EUFORMING
FGPRESSCOOL	Continuous Press and Board cooling system. Equipped with a wet scrubber (WS01) to control particulate emissions.	EUPRESS, EUCOOLING
FGTOH	Two natural gas-fired thermal oil heaters. EUTOH is 38 MMBtu/hr and EUTFLTOS1 is 10.2 MMBtu/hr.	EUTOH, EUTFLTOS1
FGFINISH	Sanding, sawing, and cutting of boards and conveyance of reject material to the RM silo. Emissions are controlled by baghouses.	EUFCOS, EUSANDING, EUCTPSAW, EURMSILO
FGTFL	The three thermally fused lamination lines. Emissions are controlled by baghouses.	EUTFL1, EUTFL2, EUTFL3
FGTANKS	Storage tanks for resins and other materials for the particle board line, resins for the paper treating lines, diesel fuel, and liquid propane.	EUCHEMICAL, EUMRESIN, EUUFRESIN, EUDIESEL, EULPTANKS
FGRICE	Emergency diesel generator engine, 1500-kilowatt, emergency diesel generator engine, 568-kilowatt, and diesel fire pump engine, 187-kilowatt.	EUEMRGRICE1, EUEMRGRICE2, EUFIREPUMP
FGAMU	Natural gas-fired air handling units, space heaters, and small water heaters.	EUMU-01, EUMU-02, EUMU-03, EUMU-04, EUMU-05, EUMU-06A, EUMU-06B, EUMU-07, EUMU-08, EUMU-09, EUMU-10, EUMU-11, EUMU-12, EUMU-13, EUMU-14, EUMU-15, EUAHU-01, EUAHU-02, EUAHU-03, EUAHU-04
FGPCWPMACT	Emission units subject to the PCWP MACT, 40 CFR 63, Subpart DDDD.	EUPRESS, EUCOOLING, EUDRYER1, EUDRYER2, EUFLAKERS, EUENERGY
FGBOILERMACT	Gas 1 Fuel Subcategory requirements for new Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These new boilers or process heaters must comply with this subpart upon startup.	EUTOH, EUTFLTOS1

## **FGAMU FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Natural gas-fired air handling units, space heaters, and small water heaters.

**Emission Unit:** EUMU-01, EUMU-02, EUMU-03, EUMU-04, EUMU-05, EUMU-06A, EUMU-06B, EUMU-07, EUMU-08, EUMU-09, EUMU-10, EUMU-11, EUMU-12, EUMU-13, EUMU-14, EUMU-15, EUAHU-01, EUAHU-02, EUAHU-03, EUAHU-04.

### **POLLUTION CONTROL EQUIPMENT**

Low NO<sub>x</sub> burners.

#### **I. EMISSION LIMITS**

N/A

#### **II. MATERIAL LIMITS**

1. The permittee shall only burn pipeline natural gas in FGAMU. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall not burn more than 429 MMSCF per year of natural gas in FGAMU based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

#### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the natural gas usage for FGAMU on a continuous basis. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804)**
2. The permittee shall conduct tune-ups and maintenance on each FGAMU burner in accordance with the manufacturer's recommendations. **(R 336.1911, R 336.2810, 40 CFR 52.21(j))**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install a device to continuously monitor and record the natural gas usage rate for FGAMU. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall not operate FGAMU unless the low NO<sub>x</sub> burners are installed and operating properly. **(R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
3. The heat input capacity of each hot water generator FGAMU shall be less than 10 MMBtu per hour. **(40 CFR 60, Subpart Dc)**

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall keep the following information on a monthly basis for FGAMU, using emission factors acceptable to the AQD District Supervisor and the natural gas usage records:
  - a) CO, NO<sub>x</sub>, VOC, PM, PM10, PM2.5, and CO<sub>2e</sub> mass emission calculations determining the monthly emission rate in tons per calendar month.
  - b) CO, NO<sub>x</sub>, VOC, PM, PM10, PM2.5, and CO<sub>2e</sub> mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

3. The permittee shall monitor and record the natural gas usage rate for FGAMU on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

## **VII. REPORTING**

N/A

## **VIII. STACK/VENT RESTRICTIONS**

N/A

## **IX. OTHER REQUIREMENTS**

N/A

### **Footnotes:**

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

<b>FGFUGITIVES FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

Fugitive emission sources at the facility.

**Emission Unit:** EUROADS, EUDEBARK, EUWOODSTORAGE, EUBB.

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. Opacity	20%, except for one 6-minute average per hour of not more than 27%.	6-minute average	Each emission unit in FGFUGITIVES	SC VI.1	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall sweep and/or apply water to plant roadways as necessary to meet the opacity limit specified in SC I.1, as described in the nuisance minimization plan for fugitive dust. **(R 336.1301, Act 451 324.5524)**
2. The permittee shall operate EUDEBARK and EUBB using good housekeeping practices, as described in the nuisance minimization plan for fugitive dust. **(R 336.1301, Act 451 324.5524)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall pave the plant roadways routinely travelled by trucks delivering material to the facility, including chemicals, logs, and wood chips and trucks hauling finished product from the facility. **(R 336.1301, Act 451 324.5524)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor each emission unit in FGFUGITIVES to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar week when the equipment is operating. Each visible emission reading shall be taken during routine operating conditions. Either a certified or non-certified reader shall take each visible emission reading. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the nuisance minimization plan for fugitive dust and document the corrective action taken. **(R 336.1301, R 336.1911, Act 451 324.5524)**
2. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGFUGITIVES. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301, Act 451 324.5524)**
3. The permittee shall keep, in a satisfactory manner, records of all sweeping and watering of the plant roadways. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301, Act 451 324.5524)**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

**FGDRYERRTO  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Process equipment normally exhausted through the dryer RTO (RTO1).

**Emission Unit:** EUFLAKERS, EUDRYER1, EUDRYER2, EUENERGY.

**POLLUTION CONTROL EQUIPMENT**

RTO1.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. CO	36.3 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.2804, R 336.2810
2. NO <sub>x</sub>	170 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.2803, R 336.2804, R 336.2810
3. VOC	7.1 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.1225, R 336.1702(a), R 336.2810
4. PM	29.1 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.2810
5. PM <sub>10</sub>	28.4 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.2803, R 336.2804, R 336.2810
6. PM <sub>2.5</sub>	16.55 lb/hr	Hourly	FGDRYERRTO	SC V.1	R 336.2803, R 336.2804, R 336.2810
7. GHG as CO <sub>2e</sub>	257,292 tpy	12-month rolling time period as determined at the end of each calendar month.	FGDRYERRTO	SC VI.3	40 CFR 52.21(j)
8. Formaldehyde	3.5 lb/hr <sup>1</sup>	Hourly	FGDRYERRTO	SC V.2	R 336.1225(3)
9. Acetaldehyde	3.5 lb/hr <sup>1</sup>	Hourly	FGDRYERRTO	SC V.2	R 336.1225(3)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
10. Total HAP*	90% reduction, measured as THC (as carbon); or 20 ppmvd THC (as carbon); or 90% reduction of methanol; or 1 ppmvd methanol (if uncontrolled methanol entering the control device is greater than 10 ppmvd; or 90% reduction of formaldehyde; or 1 ppmvd formaldehyde (if formaldehyde emissions entering the control device are greater than 10 ppmvd.	3-hour block	FGDRYER1, RT01	SC V.2	40 CFR 63.2240(b)
11. Opacity	20%, except for one 6-minute average per hour of not more than 27%.	6-minute average	FGDRYER1, RT01	SC VI.5	R 336.1301
12. CO	0.43 lb/oven dried ton	Hourly	FGDRYER1, RT01	SC V.1	R 336.2810
13. NO <sub>x</sub>	2.0 lb/oven dried ton	Hourly	FGDRYER1, RT01	SC V.1	R 336.2810
14. VOC	95% reduction (by weight)	3-hour block	FGDRYER1, RT01	SC V.1	R 336.1225, R 336.1702(a), R 336.2810

\* Total HAP, as defined in 40 CFR 63.2292, includes acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde.

## II. MATERIAL LIMITS

- The permittee shall only burn pipeline natural gas in EUDRYER1, EUDRYER2 and RTO1. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

## III. PROCESS/OPERATIONAL RESTRICTIONS

- The permittee shall calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the natural gas usage for EUDRYER1, EUDRYER2 and RTO1 on a continuous basis. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804)**
- The permittee shall conduct tune-ups and maintenance on the EUDRYER1, EUDRYER2 and RTO1 burners in accordance with the manufacturer's recommendations. **(R 336.1911, R 336.2810, 40 CFR 52.21(j))**
- Except as specified in SC III.6, the permittee shall not operate EUDRYER1 or EUDRYER2 unless a minimum temperature in RTO1, as determined during the most recent performance test and documented in the MAP, is maintained. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
- Except as specified in SC III.6, the permittee shall maintain the three-hour block average firebox temperature in RTO1 above the minimum temperature established during the performance test according to 40 CFR 63.2262(n). **(Table 2 of 40 CFR 63, Subpart DDDD)**

5. Except as specified in SC III.6, upon bypass of RTO1, the permittee shall initiate an immediate shutdown, consistent with safe operating practices, of EUENERGY, EUDRYER1, and EUDRYER2. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
6. The permittee may operate FGDRYERRTO during bypass of RTO1 under the following conditions: **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
  - a) There shall be no wood chips or flakes in the dryers.
  - b) Total heat input to the dryers shall not exceed 140 MMBTU per hour with no more than 100 MMBTU per hour provided by wood combustion in EUENERGY.
  - c) Total bypass of RTO1 shall not exceed 500 hours per 12-month rolling time period, as determined at the end of each calendar month.
  - d) The permittee shall immediately commence shutdown of, and once shutdown shall not operate, EUFLAKERS, EUPRESS, and EUCOOLING during bypass of RTO1

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install a device to continuously monitor and record the natural gas usage rate for EUDRYER1, EUDRYER2 and RTO1. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall not operate EUDRYER1, EUDRYER2 or RTO1 unless the low NOx burners are installed and operating properly. **(R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
3. The maximum design heat input capacity for each natural gas dryer burner in FGDRYERRTO shall not exceed a maximum of 139.9 MMBTU per hour on a fuel heat input basis. **(R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))**
4. The maximum design heat input capacity for RTO1 shall not exceed a maximum of 25 MMBTU per hour on a fuel heat input basis. **(R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))**
5. Except as specified in SC III.6, the permittee shall not operate EUDRYER1 or EUDRYER2 unless thermal oxidizer RTO1 is installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC destruction efficiency of 95 percent (by weight) and maintaining a minimum temperature as determined during the most recent performance test and documented in the MAP, is maintained. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336. 1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
6. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a temperature monitoring device in the combustion chamber of thermal oxidizer RTO1 to monitor and record the temperature, on a continuous basis. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
7. The permittee shall meet and maintain the three-hour block average firebox temperature above the minimum temperature established during the performance test, as specified in Table 2 of 40 CFR 63, Subpart DDDD. **(40 CFR 63.2240(b))**
8. The temperature monitoring device must meet the requirements in 40 CFR 63.2269(b)(1) through (6). **(40 CFR 63.2269(b))**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days of achieving the maximum production rate, but not later than March 31, 2021, and every five years thereafter, the permittee shall verify the CO, NO<sub>x</sub>, VOC, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission rates from FGDRYERRTO and the VOC destruction efficiency of RTO1 by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM <sub>10</sub> / PM <sub>2.5</sub>	40 CFR Part 51, Appendix M
NO <sub>x</sub>	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A

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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

2. Not later than May 31, 2021, and every five years thereafter, the permittee shall verify the formaldehyde and acetaldehyde emission rates from FGDRYERRTO by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
HAPs	40 CFR Part 63, Appendix A

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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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>1</sup> **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

3. To demonstrate initial compliance with the emission limit and operating requirements, the permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 to 40 CFR 63, Subpart DDDD according to the requirements in 40 CFR 63.2262 and Table 4 to 40 CFR 63, Subpart DDDD. **(40 CFR 63.2260(a))**
4. The permittee must conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date that is specified in §63.2233 and according to 40 CFR 63.7(a)(2). **(40 CFR 63.2261(a))**
5. The permittee must conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in 40 CFR 63.2262(b) through (o), and according to the methods specified in Table 4 to 40 CFR 63, Subpart DDDD. **(40 CFR 63.2262(a))**

6. The permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). **(40 CFR 63.2280(c))**
7. Upon request from the AQD District Supervisor, the permittee may be required to verify the GHG emissions from FGDRYERRTO by testing at owner's expense, in accordance with Department requirements. 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 AQD must approve the final plan prior to testing. Verification of emission factors includes the submittal of 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. **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, 40 CFR 52.21 (j))**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall monitor and record, in a satisfactory manner, the temperature in the combustion chamber of the thermal oxidizer, on a continuous basis. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
3. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling time period CO<sub>2e</sub> mass emissions for FGDRYERRTO using emission factors from the most recent valid emission testing data or other emission factors acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the District Supervisor. **(40 CFR 52.21(j))**
4. The permittee shall monitor and record the natural gas usage rate for EUDRYER1, EUDRYER2 and RTO1 on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
5. The permittee shall monitor FGDRYERRTO to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar day when the equipment is operating. Upon written approval from the AQD District Supervisor, the permittee may reduce the monitoring frequency to once per calendar week if no corrective action was required during a consecutive six-month period. If corrective action is required after reducing monitoring to weekly, the permittee shall resume daily monitoring until another six-month consecutive period of no corrective actions occurs. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
6. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGDRYERRTO. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**

7. The permittee shall monitor and collect data according to 40 CFR 63.2270, as follows: **(40 CFR 63.2270(a))**
  - a) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee shall use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
  - b) The permittee shall not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control system.
  - c) The permittee shall determine the three-hour block average of all recorded readings, calculated after every three hours of operation as the average of the evenly spaced recorded readings in the previous three operating hours (excluding periods described in paragraphs a) and b) above).
  - d) To calculate the data averages for each three-hour or 24-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.*, not from periods described in a) and b) above).
8. The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of 40 CFR 2269, as follows: **(40 CFR 63.2269(a))**
  - a) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
  - b) At all times, the permittee shall maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
  - c) Record the results of each inspection, calibration, and validation check.
9. The permittee shall monitor and record, in a satisfactory manner, the time and duration of each bypass of thermal oxidizer RTO1. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
10. The permittee shall monitor and record, in a satisfactory manner, the total heat input to FGDRYERRTO during bypass of RTO1, including the heat input provided by wood combustion in EUENERGY, on a monthly and 12 month rolling time period basis as determined at the end of each calendar month. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

## **VII. REPORTING**

NA

### **VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-24	123	109.9	R 336.1225, R 336.2803, R 336.2804
2. Bypass S-1	79	72.2	R 336.2803, R 336.2804
3. Bypass N-1	79	72.2	R 336.2803, R 336.2804

### **IX. OTHER REQUIREMENTS**

NA

#### **Footnotes:**

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

**FGMTRLHNDL  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Material handling sources at the facility with emissions controlled by baghouses.

**Emission Unit:** EUOVERS1, EUOVERS2, EUOVERS3, EUFINES, EUSIFTER, EUBARKSTG.

**POLLUTION CONTROL EQUIPMENT**

EUOVERS1, EUOVERS2, and EUOVERS3 controlled by BH05, EUFINES controlled by BH20, EUSIFTER controlled by BH08, EUBARKSTG controlled by BH14B.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.61 lb/hr	Hourly	Overs mills exhausted through BH05	SC V.1, SCVI.1	R 336.2810
2. PM10	0.61 lb/hr	Hourly	Overs mills exhausted through BH05	SC V.1, SCVI.1	R 336.2803, R 336.2804, R 336.2810
3. PM2.5	0.61 lb/hr	Hourly	Overs mills exhausted through BH05	SC V.1, SCVI.1	R 336.2803, R 336.2804, R 336.2810
4. VOC	20.6 lb/hr	Hourly	Overs mills exhausted through BH05	SC V.1, SCVI.4	R 336.1702, R 336.1225, R 336.2810
5. Formaldehyde	0.29 lb/hr <sup>1</sup>	Hourly	Overs mills exhausted through BH05	SC V.1, SCVI.4	R 336.1225(3)
6. Acetaldehyde	5.0 lb/hr <sup>1</sup>	Hourly	Overs mills exhausted through BH05	SC V.1, SC VI.4	R 336.1225(2)
7. PM	0.03 lb/hr	Hourly	EUFINES	SC V.1, SC VI.1	R 336.2810
8. PM10	0.03 lb/hr	Hourly	EUFINES	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
9. PM2.5	0.03 lb/hr	Hourly	EUFINES	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
10. VOC	1.93 lb/hr	Hourly	EUFINES	SC V.1, SC VI.4	R 336.1702, R 336.2810
11. PM	0.41 lb/hr	Hourly	EUSIFTER	SC V.1, SC VI.1	R 336.2810
12. PM10	0.41 lb/hr	Hourly	EUSIFTER	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
13. PM2.5	0.41 lb/hr	Hourly	EUSIFTER	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
14. VOC	18.0 lb/hr	Hourly	EUSIFTER	SC V.1, SC VI.4	R 336.1702, R 336.1225, R 336.2810
15. Formaldehyde	0.04 lb/hr <sup>1</sup>	Hourly	EUSIFTER	SC V.1, SC VI.4	R 336.1225(3)
16. Acetaldehyde	2.06 lb/hr <sup>1</sup>	Hourly	EUSIFTER	SC V.1, SC VI.4	R 336.1225(2)
17. PM	0.06 lb/hr	Hourly	EUBARKSTG	SC V.1, SC VI.1	R 336.2810
18. PM10	0.06 lb/hr	Hourly	EUBARKSTG	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
19. PM2.5	0.06 lb/hr	Hourly	EUBARKSTG	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
20. VOC	0.55 lb/hr	Hourly	EUBARKSTG	SC V.1, SC VI.4	R 336.1702, R 336.2810
21. PM	0.002 gr/dscf	Hourly	Each emission unit in FGMTRLHNDL	SC V.1, SC VI.1	R 336.1331
22. Opacity	10%	6-minute average	Each emission unit in FGMTRLHNDL	SC VI.2	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

- The permittee shall not operate the following emission units unless the corresponding baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. **(R 336.1205, R 336.1301, R 336.1331, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

Emission Unit	Corresponding Baghouse
EUOVERS1, EUOVERS2, EUOVERS3	BH05
EUFINES	BH20
EUSIFTER	BH08
EUBARKSTG	BH14B

- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a pressure drop monitoring device on each baghouse in FGMTRLHNDL. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC, PM, PM10, PM2.5, formaldehyde<sup>1</sup>, and/or acetaldehyde<sup>1</sup> emissions from any emission point in FGMTRLHNDL by testing at owner's expense, in accordance with Department requirements. 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
VOCs	40 CFR Part 60, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor the pressure drop of each baghouse in FGMTRLHNDL on a continuous basis. Whenever an emission unit is operating, the permittee shall record the pressure drop of the associated baghouse at least once per day. If the pressure drop is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
2. The permittee shall monitor each emission unit in FGMTRLHNDL to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar week when the equipment is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
3. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for each emission unit in FGMTRLHNDL. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**
4. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGMTRLHNDL VOC, formaldehyde, and acetaldehyde emission limits. These records shall include the emission factors, operating parameters, calculations, and other information needed to demonstrate compliance with the emission limits. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the FGMTRLHNDL emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. (R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-05	39.4	59.1	R 336.1225, R 338.2803, R 336.2804
2. SV-20	8.2	75.5	R 336.1225, R 338.2803, R 336.2804
3. SV-08	31.5	50.9	R 336.1225, R 338.2803, R 336.2804
4. SV-14B	18.1	52.5	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

**FGBLNDFRM  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Blending and forming operations.

**Emission Unit:** EUBLENDING, EUFORMING.

**POLLUTION CONTROL EQUIPMENT**

EUBLENDING controlled by baghouse BH12. EUFORMING controlled by baghouses BH11 and BH13.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	17.3 lb/hr	Hourly	EUBLENDING	SC V.2, SC VI.6	R 336.1225, R 336.1702(a), R 336.2810
2. Formaldehyde	0.25 lb/hr <sup>1</sup>	Hourly	EUBLENDING	SC V.2, SC VI.6	R 336.1225(3)
3. Acetaldehyde	1.19 lb/hr <sup>1</sup>	Hourly	EUBLENDING	SC V.2, SC VI.6	R 336.1225(2)
4. VOC	9.34 lb/hr	Hourly	EUFORMING	SC V.1, SC VI.6	R 336.1225, R 336.1702(a), R 336.2810
5. Formaldehyde	0.76 lb/hr <sup>1</sup>	Hourly	EUFORMING	SC V.3, SC VI.6	R 336.1225(3)
6. Acetaldehyde	2.9 lb/hr <sup>1</sup>	Hourly	EUFORMING	SC V.3, SC VI.6	R 336.1225(2)
7. PM	0.002 gr/dscf	Hourly	Each emission unit in FGBLNDFRM	SC V.1, SC V.2, SC VI.2	R 336.1331
8. PM	0.41 lb/hr	Hourly	EUBLENDING	SC V.2, SC VI.2	R 336.2810
9. PM10	0.41 lb/hr	Hourly	EUBLENDING	SC V.2, SC VI.2	R 336.2803, R 336.2804, R 336.2810
10. PM2.5	0.41 lb/hr	Hourly	EUBLENDING	SC V.2, SC VI.2	R 336.2803, R 336.2804, R 336.2810
11. PM	1.05 lb/hr	Hourly	EUFORMING through SV11	SC V.1, SC VI.2	R 336.2810
12. PM10	1.05 lb/hr	Hourly	EUFORMING through SV 11	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
13. PM2.5	1.05 lb/hr	Hourly	EUFORMING through SV11	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
14. PM	0.66 lb/hr	Hourly	EUFORMING through SV13	SC V.1, SC VI.2	R 336.2810
15. PM10	0.66 lb/hr	Hourly	EUFORMING through SV13	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
16. PM2.5	0.66 lb/hr	Hourly	EUFORMING through SV13	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
17. Opacity	10%	6-minute average	Each emission unit in FGBLNDFRM	SC VI.4	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

- The permittee shall not operate the following emission units unless the corresponding baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. (R 336.1205, R 336.1301, R 336.1331, R 336.1911, R 336.2803, R 336.2804, R 336.2810)

Emission Unit	Corresponding Baghouse
EUBLENDING	BH12
EUFORMING	BH11
EUFORMING	BH13

- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a pressure drop monitoring device on each baghouse in FGBLNDFRM. (R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. (R 336.1201(3))

- Within 180 days of achieving the maximum production rate, but not later than March 31, 2021, and every five years thereafter, the permittee shall verify the VOC, PM, PM10, and PM2.5 emission rates from EUFORMING by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
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
VOCs	40 CFR Part 60, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. (R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)

- Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC, PM, PM10, PM2.5, formaldehyde<sup>1</sup>, and/or acetaldehyde<sup>1</sup> emission rates from EUBLENDING, by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
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
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

- Not later than May 31, 2021, and every five years thereafter, the permittee shall verify the formaldehyde and acetaldehyde emission rates from EUFORMING by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
HAPs	40 CFR Part 63, Appendix A

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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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>1</sup> **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

- The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
- The permittee shall monitor each baghouse in FGBLNDFRM on a continuous basis. Whenever an emission unit is operating, the permittee shall record the pressure drop of the associated baghouse at least once per day. If the pressure drop is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

3. The permittee shall monitor each emission unit in FGBLNDFRM to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar week when the equipment is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
4. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for each emission unit in FGBLNDFRM. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**
5. The permittee shall keep records of the VOC and formaldehyde content of each resin and scavenger used in FGBLNDFRM, using manufacturer's formulation data, certificates of analysis, or other records approved by the AQD District Supervisor. The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**
6. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGBLNDFRM VOC, formaldehyde, and acetaldehyde emission limits. These records shall include the emission factors, operating parameters, calculations, and other information needed to demonstrate compliance with the emission limits. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used to verify compliance with the VOC and formaldehyde resin content limits. The compliance demonstration method shall include the emission factors used and calculation examples. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-11	49.2	85.3	R 336.1225, R 338.2803, R 336.2804
2. SV-12	31.5	85.3	R 336.1225, R 338.2803, R 336.2804
3. SV-13	39.4	85.3	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

**FGPRESSCOOL  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Continuous Press and Board cooling system. Equipped with a wet scrubber (WS01) to control particulate emissions.

**Emission Unit:** EUPRESS, EUCOOLING.

**POLLUTION CONTROL EQUIPMENT**

Wet Scrubber WS01.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. CO	2.85 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.7	R 336.2804, R 336.2810
2. CO	12.5 tpy	12-month rolling time period as determined at the end of each calendar month.	FGPRESSCOOL	SC VI.3	R 336.2804, R 336.2810
3. NO <sub>x</sub>	2.5 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.7	R 336.2803, R 336.2804, R 336.2810
4. NO <sub>x</sub>	11 tpy	12-month rolling time period as determined at the end of each calendar month.	FGPRESSCOOL	SC VI.3	R 336.2803, R 336.2804, R 336.2810
5. VOC	49.5 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.7	R 336.1225, R 336.1702(a), R 336.2810
6. VOC	0.728 lb/ 1000 ft <sup>2</sup> , ¾" basis	Hourly	FGPRESSCOOL	SC V.1	R 336.1702(a), R 336.2810
7. VOC	216.8 tpy	12-month rolling time period as determined at the end of each calendar month.	FGPRESSCOOL	SC VI.3, SC VI.7	R 336.1225, R 336.1702(a), R 336.2810
8. PM	4.74 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.2	R 336.2810
9. PM10	4.74 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
10. PM2.5	4.74 lb/hr	Hourly	FGPRESSCOOL	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
11. Formaldehyde	4.40 lb/hr <sup>1</sup>	Hourly	FGPRESSCOOL	SC V.4, SC VI.7	R 336.1225(3)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
12. Acetaldehyde	1.1 lb/hr <sup>1</sup>	Hourly	FGPRESSCOOL	SC V.4, SC VI.7	R 336.1225(2)
13. Total HAP*	0.30 lb/ 1000 ft <sup>2</sup> , ¾" basis	Daily	EUPRESS	SC V.2, SC V.3, SC VI.8	40 CFR 63.2240(a)
14. Total HAP*	0.014 lb/ 1000 ft <sup>2</sup> , ¾" basis	Daily	EUCOOLER	SC V.2, SC V.3, SC VI.8	40 CFR 63.2240(a)
15. Opacity	20%, except for one 6-minute average per hour of not more than 27%.	6-minute average	FGPRESSCOOL	SC VI.5	R 336.1301
16. CO	0.042 lb/ 1000 ft <sup>2</sup> , ¾" basis	Hourly	FGPRESSCOOL	SC V.1, SC VI.7	R 336.2810
17. NO <sub>x</sub>	0.04 lb/ 1000 ft <sup>2</sup> , ¾" basis	Hourly	FGPRESSCOOL	SC V.1, SC VI.7	R 336.2810

\* Total HAP, as defined in 40 CFR 63.2292, includes acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. Compliance with the 0.30 lb/1000 ft<sup>2</sup>, ¾" basis limit for the press and the 0.014 lb/1000 ft<sup>2</sup>, ¾" basis limit for the cooler will be demonstrated using a single emission test on the combined EUPRESS and EUCOOLER exhaust.

18. The permittee may not use an add-on control system or wet control device to meet the production-based compliance option emission limits, SC I.13 and SC I.14. **(40 CFR 63.2240(a))**

## **II. MATERIAL LIMITS**

1. The permittee shall not process more than 595,680,000 square feet, 3/4 inch basis (gross), of particleboard in FGPRESSCOOL per twelve month rolling time period, as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

## **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. Except during emission testing to determine compliance with SC 1.13 and 1.14, the permittee shall not operate FGPRESSCOOL unless a minimum water flow rate in WS01, as determined during the most recent performance test and documented in the MAP, is maintained. **(R 336.1205, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

## **IV. DESIGN/EQUIPMENT PARAMETERS**

1. Except during emission testing to determine compliance with SC 1.13 and 1.14, the permittee shall not operate FGPRESSCOOL unless wet scrubber WS01 is installed and operating properly. Satisfactory operation of the wet scrubber includes a maintaining a minimum water flow rate as determined during the most recent performance test and documented in the MAP. **(R 336.1205, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner, a water flow rate monitoring device on wet scrubber WS01 to monitor and record the water flow rate, on a continuous basis. **(R 336.1205, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**

3. The permittee shall maintain, on a daily basis, the process unit controlling operating parameter(s) within the ranges established during the performance test according to 40 CFR 63.2262(n). **(40 CFR 63.2240(a), Table 2 to Subpart DDDD)**
4. During testing to determine compliance with the PCWP MACT emission limits (SC I.13 and I.14), the permittee shall either use a wood products enclosure as defined in 40 CFR 63.2292 or measure the capture efficiency of the capture device for the press or board cooler using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as appropriate), or using the alternative tracer gas method contained in appendix A to 40 CFR 63, Subpart DDDD. The permittee shall submit documentation that the wood products enclosure meets the press enclosure design criteria in 40 CFR 63.2292 or the results of the capture efficiency verification with the Notification of Compliance Status. **(40 CFR 63.2267)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 180 days of achieving the maximum production rate, but not later than March 31, 2021, and every five years thereafter, the permittee shall verify the CO, NOx, VOC, PM, PM10, and PM2.5 emission rates from FGPRESSCOOL by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
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
NO <sub>x</sub>	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 63.2261)**

2. The permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). **(40 CFR 63.2280(c))**
3. The permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 to 40 CFR 63, Subpart DDDD according to the requirements in 40 CFR 63.2262 and Table 4 to 40 CFR 63, Subpart DDDD. The permittee must conduct performance tests upon initial startup and according to 40 CFR 63.7(a)(2). The permittee must conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in 40 CFR 63.2262(b) through (o), and according to the methods specified in Table 4 to 40 CFR 63, Subpart DDDD. **(40 CFR 63.2260(a), 40 CFR 63.2261(a), 40 CFR 2262(a))**
4. Not later than May 31, 2021, and every five years thereafter, the permittee shall verify the formaldehyde and acetaldehyde emission rates from FGPRESSCOOL by testing at owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
Formaldehyde	40 CFR Part 63, Appendix A
Acetaldehyde	40 CFR Part 63, Appendix A
HAPs	Method 320 in appendix A to this part; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see §63.14); OR the NCASI Method ISS/FP-A105.01 (IBR, see §63.14); OR ASTM D6348-03 (IBR, see §63.14) 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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>1</sup> **(R 336.1225, R 336.2001, R 336.2003, R 336.2004)**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
2. The permittee shall monitor and record, in a satisfactory manner, the water flow rate in the wet scrubber WS01, on a continuous basis. Flow rate data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. If the flow rate is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1205, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
3. The permittee shall calculate and keep, in a satisfactory manner, records of monthly and 12-month rolling time period CO, NO<sub>x</sub>, and VOC for FGPRESSCOOL emission rates using the most recent valid emission testing data. The permittee shall keep all records on file and make them available to the Department upon request. The calculations shall be performed using a method approved by the District Supervisor. **(R 336.1205, R 336.1225, R 336.1702, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
4. The permittee shall monitor and record the particleboard production rate, in units of 1,000 square feet on a ¾ inch basis (gross), in FGPRESSCOOL on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
5. The permittee shall monitor FGPRESSCOOL to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar day when the equipment is operating. Upon written approval from the AQD District Supervisor, the permittee may reduce the monitoring frequency to once per calendar week if no corrective action was required during a consecutive six-month period. If corrective action is required after reducing monitoring to weekly, the permittee shall resume daily monitoring until another six-month consecutive period of no corrective actions occurs. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the

opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP. **(R 336.1301, R 336.1911)**

6. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGPRESSCOOL. 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. **(R 336.1301)**
7. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGPRESSCOOL CO, NO<sub>x</sub>, VOC, formaldehyde and acetaldehyde emission limits. These records shall include the emission factors, operating parameters, calculations, and other information needed to demonstrate compliance with the emission limits. **(R 336.1205, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**
8. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGPRESSCOOL total HAP emission limits. These records shall include the operating parameters established during the performance test as required by SC V.2, calculations, and other information needed to demonstrate compliance with the emission limits. **(40 CFR 63.2282)**

**VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-33	60	101.7	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**FGTOH  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Two natural gas-fired thermal oil heaters. EUTOH is 38 MMBtu/hr and EUTFLTOS1 is 10.2 MMBtu/hr.

**Emission Unit:** EUTOH, EUTFLTOS1.

**POLLUTION CONTROL EQUIPMENT**

Low NOx burners.

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. CO	0.082 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.2804, R 336.2810
2. CO	13.71 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.2804, R 336.2810
3. CO	3.69 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.2804, R 336.2810
4. NO <sub>x</sub>	0.05 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.2803, R 336.2804, R 336.2810
5. NO <sub>x</sub>	8.16 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
6. NO <sub>x</sub>	2.2 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
7. VOC	0.0054 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.1225, R 336.1702(a), R 336.2810
8. VOC	0.9 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.1225, R 336.1702(a), R 336.2810
9. VOC	0.24 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.1225, R 336.1702(a), R 336.2810
10. PM	0.0075 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.2810
11. PM	1.24 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.2810

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
12. PM	0.33 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.2810
13. PM10	0.0005 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.2803, R 336.2804, R 336.2810
14. PM10	0.08 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
15. PM10	0.02 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
16. PM2.5	0.0004 lb/MMBTU	Hourly	Each emission unit in FGTOH	SC V.1, SC VI.4	R 336.2803, R 336.2804, R 336.2810
17. PM2.5	0.07 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
18. PM2.5	0.02 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
19. GHG as CO <sub>2</sub> e	19,490 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	40 CFR 52.21(j)
20. GHG as CO <sub>2</sub> e	5,254 tpy	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	40 CFR 52.21(j)
21. Formaldehyde	0.01 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	EUTOH	SC V.1, SC VI.2	R 336.1225(3)
22. Formaldehyde	0.003 tpy <sup>1</sup>	12-month rolling time period as determined at the end of each calendar month.	EUTFLTOS1	SC V.1, SC VI.2	R 336.1225(3)

## II. MATERIAL LIMITS

1. The permittee shall only burn pipeline natural gas in FGTOH. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall not burn more than 326.4 MMSCF per year of natural gas in EUTOH based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

3. The permittee shall not burn more than 87.6 MMSCF per year of natural gas in EUTFLTOS1 based on a 12-month rolling time period as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the natural gas usage for each emission unit FGTOH on a continuous basis. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804)**
2. The permittee shall conduct tune-ups and maintenance on each FGTOH burner in accordance with the manufacturer's recommendations. **(R 336.1911, R 336.2810, 40 CFR 52.21(j))**
3. The permittee shall operate and maintain each emission unit in FGTOH, including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions and comply with the applicable requirements of Table 3 of 40 CFR Part 63, Subpart DDDDD. **(R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

### **IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall install a device to continuously monitor and record the natural gas usage rate for each emission unit in FGTOH. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall not operate any emission unit in FGTOH unless the associated low NO<sub>x</sub> burner is installed and operating properly. **(R 336.1910, R 336.2803, R 336.2804, R 336.2810)**
3. The maximum design heat input capacity for EUTOH shall not exceed a maximum of 38 MMBTU per hour on a fuel heat input basis. **(R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))**
4. The maximum design heat input capacity for EUTFLTOS1 shall not exceed a maximum of 10.2 MMBTU per hour on a fuel heat input basis. **(R 336.1225, R 336.2803, R 336.2804, R 228.2810, 40 CFR 52.21(j))**

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the CO, NO<sub>x</sub>, VOC, PM, PM10, PM2.5, formaldehyde, and/or GHG emissions from either emission unit in FGTOH by testing at owner's expense, in accordance with Department requirements. 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
NO <sub>x</sub>	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
2. The permittee shall keep the following information on a monthly basis for each emission unit in FGTOH using the most recent valid emission testing data or emission factors acceptable to the AQD District Supervisor and the natural gas usage records:
  - a) CO, NO<sub>x</sub>, VOC, PM, PM10, PM2.5, formaldehyde, and CO<sub>2e</sub> mass emission calculations determining the monthly emission rate in tons per calendar month.
  - b) CO, NO<sub>x</sub>, VOC, PM, PM10, PM2.5, formaldehyde, and CO<sub>2e</sub> mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

3. The permittee shall monitor and record the natural gas usage rate for each emission unit in FGTOH on a monthly and 12-month rolling time period basis as determined at the end of each calendar month. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
4. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGTOH CO, NO<sub>x</sub>, VOC, PM, PM10, and PM2.5 lb/MMBtu emission limits. These records shall include the manufacturer's specifications, operating parameters, calculations, and other information needed to demonstrate compliance with the emission limits. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

**VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the FGTOH emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-35	29.9	50.9	R 336.1225, R 338.2803, R 336.2804
2. SV-36	16.4	32.8	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

NA

**Footnotes:**

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

**FGFINISH  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Sanding, sawing, and cutting of boards and conveyance of reject material to the RM silo. Emissions are controlled by baghouses.

**Emission Unit:** EUFCOS, EUSANDING, EUCTPSAW, EURMSILO.

**POLLUTION CONTROL EQUIPMENT**

EUFCOS controlled by BH17, EUSANDING controlled by BH18, EUCTPSAW controlled by BH19, EURMSILO controlled by BH14A.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period/ Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	10.3 lb/hr	Hourly	EUFCOS	SC V.1, SC VI.4	R 336.1225, R 336.1702(a), R 336.2810
2. PM	0.55 lb/hr	Hourly	EUFCOS	SC V.1, SC VI.1	R 336.2810
3. PM10	0.55 lb/hr	Hourly	EUFCOS	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
4. PM2.5	0.55 lb/hr	Hourly	EUFCOS	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
5. Formaldehyde	1.93 lb/hr <sup>1</sup>	Hourly	EUFCOS	SC V.1, SC VI.4	R 336.1225(3)
6. VOC	6.9 lb/hr	Hourly	EUSANDING	SC V.1, SC VI.4	R 336.1225, R 336.1702(a), R 336.2810
7. PM	1.43 lb/hr	Hourly	EUSANDING	SC V.1, SC VI.1	R 336.2810
8. PM10	1.43 lb/hr	Hourly	EUSANDING	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
9. PM2.5	1.43 lb/hr	Hourly	EUSANDING	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
10. Formaldehyde	0.3 lb/hr <sup>1</sup>	Hourly	EUSANDING	SC V.1, SC VI.4	R 336.1225(3)
11. Acetaldehyde	0.15 lb/hr <sup>1</sup>	Hourly	EUSANDING	SC V.1, SC VI.4	R 336.1225(2)
12. VOC	3.0 lb/hr	Hourly	EUCTPSAW	SC V.1, SC VI.4	R 336.1225, R 336.1702(a), R 336.2810
13. PM	0.44 lb/hr	Hourly	EUCTPSAW	SC V.1, SC VI.1	R 336.2810

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
14. PM10	0.44 lb/hr	Hourly	EUCTPSAW	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
16. PM2.5	0.44 lb/hr	Hourly	EUCTPSAW	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
16. Formaldehyde	0.21 lb/hr <sup>1</sup>	Hourly	EUCTPSAW	SC V.1, SC VI.4	R 336.1225(3)
17. VOC	0.54 lb/hr	Hourly	EURMSILO	SC V.1, SC VI.4	R 336.1225, R 336.1702(a), R 336.2810
18. PM	0.06 lb/hr	Hourly	EURMSILO	SC V.1, SC VI.1	R 336.2810
19. PM10	0.06 lb/hr	Hourly	EURMSILO	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
20. PM2.5	0.06 lb/hr	Hourly	EURMSILO	SC V.1, SC VI.1	R 336.2803, R 336.2804, R 336.2810
21. PM	0.002 gr/dscf	Hourly	Each emission unit in FGINISH	SC V.1, SC VI.1	R 336.1331
22. Opacity	10%	6-minute average	Each emission unit in FGINISH	SC VI.2	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

- The permittee shall not operate the following emission units unless the corresponding baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. **(R 336.1205, R 336.1301, R 336.1331, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

Emission Unit	Corresponding Baghouse
EUF COS	BH17
EUSANDING	BH18
EUCTPSAW	BH19
EURMSILO	BH14A

- The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a pressure drop monitoring device on each baghouse in FGINISH. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**

## **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC, PM, PM10, PM2.5, formaldehyde<sup>1</sup>, and/or acetaldehyde<sup>1</sup> emissions from any emission unit in FGFINISH by testing at owner's expense, in accordance with Department requirements. 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
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor the pressure drop of each baghouse in FGFINISH on a continuous basis. Whenever an emission unit is operating, the permittee shall record the pressure drop of the associated baghouse at least once per day. If the pressure drop is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
2. The permittee shall monitor each emission unit in FGFINISH to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar week when the equipment is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
3. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for each emission unit in FGFINISH. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**
4. The permittee shall keep, in a satisfactory manner, records to demonstrate compliance with the FGFINISH VOC, formaldehyde, and acetaldehyde emission limits. These records shall include emission factors, operating parameters, calculations, and other information needed to demonstrate compliance with the emission limits. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**VII. REPORTING**

1. Not less than 60 days prior to startup of EUPRESS, as defined under 40 CFR 63.2292, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the FGINISH emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. (R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-17	39.4	82	R 336.1225, R 338.2803, R 336.2804
2. SV-18	63	91.9	R 336.1225, R 338.2803, R 336.2804
3. SV-19	31.5	82	R 336.1225, R 338.2803, R 336.2804
4. SV-14A	18.1	75.5	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

**FGTFL  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

The three thermally fused lamination lines.

**Emission Unit:** EUTFL1, EUTFL2, EUTFL3.

**POLLUTION CONTROL EQUIPMENT**

EUTFL1 controlled by BH 28, EUTFL2 controlled by BH 29, EUTFL3 controlled by BH 30.

**I. EMISSION LIMITS**

<b>Pollutant</b>	<b>Limit</b>	<b>Time Period / Operating Scenario</b>	<b>Equipment</b>	<b>Testing / Monitoring Method</b>	<b>Underlying Applicable Requirements</b>
1. VOC	0.05 lb/hr	Hourly	Each emission unit in FGTFL	SC V.1	R 336.1225, R 336.1702(a), R 336.2810
2. VOC	0.24 tpy	12-month rolling time period as determined at the end of each calendar month.	Each emission unit in FGTFL	SC V.1, SC VI.5	R 336.1225, R 336.1702(a), R 336.2810
3. PM	0.33 lb/hr	Hourly	Each emission unit in FGTFL	SC V.1, SC VI.2	R 336.2810
4. PM	0.002 gr/dscf	Hourly	Each emission unit in FGTFL	SC V.1, SC VI.2	R 336.1331
5. PM	1.45 tpy	12-month rolling time period as determined at the end of each calendar month.	Each emission unit in FGTFL	SC V.1, SC VI.5	R 336.2810
6. PM10	0.33 lb/hr	Hourly	Each emission unit in FGTFL	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
7. PM10	1.45 tpy	12-month rolling time period as determined at the end of each calendar month.	Each emission unit in FGTFL	SC V.1, SC VI.5	R 336.2803, R 336.2804, R 336.2810
8. PM2.5	0.33 lb/hr	Hourly	Each emission unit in FGTFL	SC V.1, SC VI.2	R 336.2803, R 336.2804, R 336.2810
9. PM2.5	1.45 tpy	12-month rolling time period as determined at the end of each calendar month.	Each emission unit in FGTFL	SC V.1, SC VI.5	R 336.2803, R 336.2804, R 336.2810
10. Formaldehyde	0.05 lb/hr <sup>1</sup>	Hourly	Each emission unit in FGTFL	SC V.1	R 336.1225(3)
11. Opacity	10%	6-minute average	Each emission unit in FGTFL	SC VI.4	R 336.1301

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

N/A

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not operate the following emission units unless the corresponding baghouse is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the pressure drop as described in the MAP. **(R 336.1205, R 336.1301, R 336.1331, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

<b>Emission Unit</b>	<b>Corresponding Baghouse</b>
EUTFL1	BH28
EUTFL2	BH29
EUTFL3	BH30

2. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a pressure drop monitoring device on each baghouse in FGTF. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.2803, R 336.2804, R 336.2810)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Upon request from the AQD District Supervisor, the permittee may be required to verify the VOC, PM, PM10, PM2.5, and/or formaldehyde emissions from any emission unit in FGTF by testing at owner's expense, in accordance with Department requirements. 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
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations/records in a format acceptable to the AQD District Supervisor and make them available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

2. The permittee shall monitor the pressure drop of each baghouse in FGTFE on a continuous basis. Whenever an emission unit is operating, the permittee shall record the pressure drop of the associated baghouse at least once per day. If the pressure drop is outside the range established in the MAP, the permittee shall take corrective action as described in the MAP and document the corrective action taken. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1205, R 336.1301, R 336.1331, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**
3. The permittee shall monitor each emission unit in FGTFE to verify compliance with the opacity limit by taking visible emission readings a minimum of once per calendar week when the equipment is operating. Either a certified or non-certified reader shall take each visible emission reading during routine operating conditions. If a certified reader observes visible emissions that exceed the opacity limit or if a non-certified reader observes visible emissions above normal, the permittee shall take corrective action as described in the MAP and document the corrective action taken. **(R 336.1301, R 336.1911)**
4. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for each emission unit in FGTFE. At a minimum, records shall include the date, time, name of observer/reader, whether the reader is certified, status of visible emissions, and any corrective action taken. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1301)**
5. The permittee shall keep the following information on a monthly basis for each emission unit in FGTFE using the most recent valid emission testing data or emission factors acceptable to the AQD District Supervisor and the natural gas usage records:
  - a) VOC, PM, PM10, and PM2.5 mass emission calculations determining the monthly emission rate in tons per calendar month.
  - b) VOC, PM, PM10, and PM2.5 mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records on file at the facility, in a format acceptable to the AQD District Supervisor, and make them available to the Department upon request. **(R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

**VII. REPORTING**

1. Not less than 60 days prior to startup of each emission unit in FGTFE, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the FGTFE emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. **(R 336.1205, R 336.1225, R 336.1331, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

**VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-28	31.5	55.8	R 336.1225, R 338.2803, R 336.2804
2. SV-29	31.5	55.8	R 336.1225, R 338.2803, R 336.2804
3. SV-30	31.5	55.8	R 336.1225, R 338.2803, R 336.2804

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

<b>FGTANKS FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

Storage tanks for resins and other materials for the particle board line, resins for the paper treating lines, diesel fuel, and liquid propane.

**Emission Unit:** EUCHEMICAL, EUMRESIN, EUUFRESIN, EUDIESEL, EUPLTANKS.

**POLLUTION CONTROL EQUIPMENT**

Breather vents and submerged fill pipes on non-pressurized tanks.

**I. EMISSION LIMITS**

N/A

**II. MATERIAL LIMITS**

N/A

**III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee shall install, maintain, and operate in a satisfactory manner, breather vents on each non-pressurized tank in FGTANKS. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall not fill any non-pressurized tank in FGTANKS unless the tank is equipped with submerged fill piping. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

**VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall keep records of all material deliveries to each tank if FGTANKS, including the date of delivery and the amount of material delivered. **(R 336.1205, R 336.1225, R 336.1702, R 336.2810)**

**VII. REPORTING**

N/A

**VIII. STACK/VENT RESTRICTIONS**

N/A

**IX. OTHER REQUIREMENTS**

N/A

**Footnotes:**

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

**FGRICE  
FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Emergency diesel generator engine, 1,500-kilowatt, emergency diesel generator engine, 568-kilowatt, and diesel fire pump engine, 187-kilowatt.

**Emission Unit:** EUEMRGRICE1, EUEMRGRICE2, EUFIREPUMP.

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMITS**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NMHC + NO <sub>x</sub>	4.0 g/KW-hr	Hourly	EUFIREPUMP	SC VI.2, SC VI.3	40 CFR 60.4205(c), 40 CFR 60, Subpart IIII, Table 4
2. NO <sub>x</sub>	1.65 lb/hr	Hourly	EUFIREPUMP	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
3. CO	3.5 g/KW-hr	Hourly	EUFIREPUMP	SC VI.2, SC VI.3	40 CFR 60.4205(c), 40 CFR 60, Subpart IIII, Table 4
4. CO	1.44 lb/hr	Hourly	EUFIREPUMP	SC V.2, SC VI.2, SC VI.3	R 336.1205, R 336.2804, R 336.2810
5. PM	0.2 g/KW-hr	Hourly	EUFIREPUMP	SC VI.2, SC VI.3	40 CFR 60.4205(c), 40 CFR 60, Subpart IIII, Table 4
6. PM	0.08 lb/hr	Hourly	EUFIREPUMP	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
7. PM10	0.08 lb/hr	Hourly	EUFIREPUMP	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
8. PM2.5	0.08 lb/hr	Hourly	EUFIREPUMP	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
9. GHG as CO <sub>2e</sub>	70 tpy	12-month rolling time period as determined at the end of each calendar month.	EUFIREPUMP	SC VI.6	40 CFR 52.21(j)
10. NMHC + NO <sub>x</sub>	6.4 g/KW-hr	Hourly	EUEMRGRICE1	SC VI.2, SC VI.3	40 CFR 60.4205(d)(2)
11. NO <sub>x</sub>	21.2 lb/hr	Hourly	EUEMRGRICE1	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
12. CO	3.5 g/KW-hr	Hourly	EUEMRGRICE1	SC VI.2, SC VI.3	40 CFR 60.4205(d)(2)
13. CO	11.6 lb/hr	Hourly	EUEMRGRICE1	SC V.2, SC VI.2, SC VI.3	R 336.1205, R 336.2804, R 336.2810
14. PM	0.20 g/KW-hr	Hourly	EUEMRGRICE1	SC VI.2, SC VI.3	40 CFR 60.4205(d)(3)
15. PM	0.66 lb/hr	Hourly	EUEMRGRICE1	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
16. PM10	0.66 lb/hr	Hourly	EUEMRGRICE1	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
17. PM2.5	0.66 lb/hr	Hourly	EUEMRGRICE1	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
18. GHG as CO <sub>2e</sub>	590 tpy	12-month rolling time period as determined at the end of each calendar month.	EUEMRGRICE1	SC VI.6	40 CFR 52.21(j)
19. NMHC + NO <sub>x</sub>	4.00 g/KW-hr	Hourly	EUEMRGRICE2	SC VI.2, SC VI.3	40 CFR 60.4205(d)(2)
20. NO <sub>x</sub>	4.4 lb/hr	Hourly	EUEMRGRICE2	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
21. CO	3.5 g/KW-hr	Hourly	EUEMRGRICE2	SC VI.2, SC VI.3	40 CFR 60.4205(d)(2)
22. CO	3.9 lb/hr	Hourly	EUEMRGRICE2	SC V.2, SC VI.2, SC VI.3	R 336.1205, R 336.2804, R 336.2810
23. PM	0.20 g/KW-hr	Hourly	EUEMRGRICE2	SC VI.2, SC VI.3	40 CFR 60.4205(d)(3)
24. PM	0.22 lb/hr	Hourly	EUEMRGRICE2	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
25. PM10	0.22 lb/hr	Hourly	EUEMRGRICE2	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
26. PM2.5	0.22 lb/hr	Hourly	EUEMRGRICE2	SC V.2, SC VI.2, SC VI.3	R 336.1205, R336.2803, R 336.2804, R 336.2810
27. GHG as CO <sub>2</sub> e	209 tpy	12-month rolling time period as determined at the end of each calendar month.	EUEMRGRICE2	SC VI.6	40 CFR 52.21(j)

## II. MATERIAL LIMITS

- The permittee shall burn only diesel fuel in FGRICE with the maximum sulfur content of 15 ppm (0.0015 percent) by weight, and a minimum Cetane index of 40 or a maximum aromatic content of 35 volume percent. **(R 336.1205, R 336.1402(1), 40 CFR 60.4207, 40 CFR 80.510(b))**

## III. PROCESS/OPERATIONAL RESTRICTIONS

- The permittee shall not operate EUFIREPUMP, EUEMRGRICE1, or EUEMRGRICE2 for more than 500 hours per year on a 12-month rolling time period basis as determined at the end of each calendar month. These hours include the hours for the purpose of necessary maintenance checks and readiness testing as described in SC III.2. **(R 336.1205, R 336.1225, R 336.1702(a), R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**
- The permittee may operate each engine in FGRICE for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Department for approval of additional hours to be used for maintenance checks and readiness testing. A petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency internal combustion engines beyond 100 hours per calendar year. Each engine in FGRICE may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. Except as provided in 40 CFR 60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply non-emergency power as part of a financial arrangement with another entity. **(40 CFR 60.4211(f))**
- The permittee shall not operate each engine in FGRICE for more than 80 minutes per day, except during emergency conditions and required stack testing in SC V.1 and V.2. **(R 336.2803, R 336.2804)**
- The permittee shall do all of the following, except as permitted under paragraph (g) of 40 CFR 60.4211 in SC III.5: **(40 CFR 60.4206 and 60.4211(a))**
  - Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions.
  - Change only those emission-related settings that are permitted by the manufacturer.
  - Meet the requirements of 40 CFR Parts 89 (Control of Emissions from New and In-use Nonroad CI Engines) and/or 1068 (General Compliance Provisions for Highway, Stationary, and Nonroad Programs), as they apply.

5. If the permittee purchased a non-certified engine or a certified engine operating in a non-certified manner, the permittee shall keep a maintenance plan for each of such engine in FGRICE and shall, to the extent practicable, maintain and operate each engine in a manner consistent with good air pollution control practice for minimizing emissions. **(40 CFR 60.4211(g)(2) & (3))**

**IV. DESIGN/EQUIPMENT PARAMETERS**

1. The permittee shall equip and maintain each engine in FGRICE with a non-resettable hours meter to track the operating hours. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, 40 CFR 60.4209)**
2. The maximum rated power output of EUFIREPUMP shall not exceed 187 kilowatts, as certified by the equipment manufacturer, the maximum rated power output of EUEMRGRICE1 shall not exceed 1500 kilowatts, as certified by the equipment manufacturer, and the maximum rated power output of EUEMRGRICE2 shall not exceed 568 kilowatts, as certified by the equipment manufacturer. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, 40 CFR 60.4205(b) & (c), 40 CFR 60.4202(a)(2), 40 CFR Part 60, Subpart III Table 4)**

**V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. If the engine is not installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:
  - a) Conduct an initial performance test to demonstrate compliance with the applicable emission standards within one year of startup, or within one year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one year after you change emission-related settings in a way that is not permitted by the manufacturer.
  - b) If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4212.
  - c) Conduct subsequent performance testing for EUEMRGRICE every 8,760 hours of engine operation or every three years, whichever comes first, thereafter, to demonstrate compliance with the applicable emission standards.

No less than 30 days prior to testing, a complete test plan shall be submitted to the AQD. Verification of emission rates includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, 40 CFR 60.4211(g)(2) & (3), 40 CFR 60.4212)**

2. Upon request from the AQD District Supervisor, the permittee may be required to verify the NO<sub>x</sub>, CO, PM, PM10, and/or PM2.5 emissions from one, two, or all three engines in FGRICE by testing at owner's expense, in accordance with Department requirements. 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
NO <sub>x</sub>	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOCs	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A

The 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 and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. 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 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 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. **(R 336.1205, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804, R 336.2810)**

## **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804)**
2. The permittee shall keep, in a satisfactory manner, the following records for each engine in FGRICE:
  - a) For each certified engine: The permittee shall keep records of the manufacturer certification documentation.
  - b) For each uncertified engine: The permittee shall keep records of testing required in SC V.1.

The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211, R 336.2810, 40 CFR 52.21(j))**

3. The permittee shall keep, in a satisfactory manner, the following records of maintenance activity for each engine in FGRICE:
  - a) For each certified engine: The permittee shall keep records demonstrating that the engine has been maintained according to the manufacturer's emission-related written instructions, as specified in SC III.3.
  - b) For each uncertified engine: The permittee shall keep records of a maintenance plan, as required by SC III.4, and maintenance activities.

The permittee shall keep all records on file and make them available to the Department upon request. **(40 CFR 60.4211, R 336.2810, 40 CFR 52.21(j))**

4. The permittee shall monitor and record the total hours of operation and the hours of operation during non-emergencies for each engine in FGRICE, on a monthly and 12-month rolling time period basis, in a manner acceptable to the District Supervisor, Air Quality Division. The permittee shall document how many hours are spent for emergency operation of each engine in FGRICE, including what classified the operation as emergency. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j), 40 CFR 60.4211, 40 CFR 60.4214)**
5. The permittee shall keep, in a satisfactory manner, fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel oil used in FGRICE, demonstrating that the fuel meets the requirement of 40 CFR 80.510(b). The certification or test data shall include the name of the oil supplier or laboratory, the sulfur content, and cetane index or aromatic content of the fuel oil. **(R 336.1205, R 336.1225, R 336.2803, R 336.2804, R 336.1402(1), 40 CFR 60.4207)**
6. The permittee shall keep the CO<sub>2e</sub> mass emission calculations determining the monthly emission rate in tons per calendar month and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each engine in FGRICE, using emission factors acceptable to the AQD District Supervisor and the natural gas usage records. **(R 336.2810, 40 CFR 52.21(j))**

## **VII. REPORTING**

1. The permittee shall submit a notification specifying whether each engine in FGRICE will be operated in a certified or a non-certified manner to the AQD District Supervisor, in writing, within 30 days following the initial startup of the engine and within 30 days of switching the manner of operation. **(40 CFR Part 60, Subpart IIII)**

2. Not less than 60 days prior to startup of each engine in FGRICE, the permittee shall submit, to the AQD District Supervisor, the compliance demonstration method to be used in lieu of emission testing to verify compliance with the FGRICE emission limits. The compliance demonstration method shall include the emission factors used and calculation examples. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.2803, R 336.2804, R 336.2810)**

### **VIII. STACK/VENT RESTRICTIONS**

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 Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV-32A	23.3	19.7	R 336.1225, R 336.2803, R 336.2804
2. SV-32B	13.0	19.7	R 336.1225, R 336.2803, R 336.2804
3. SV-34	6.0	19.7	R 336.1225, R 336.2803, R 336.2804

### **IX. OTHER REQUIREMENTS**

1. The permittee shall comply with all applicable General Provisions identified in Table 8 of 40 CFR Part 60, Subpart IIII, for Stationary Reciprocating Internal Combustion Engines. **(40 CFR 60.4218)**
2. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart IIII, as they apply to each engine in FGRICE. **(40 CFR Part 60, Subparts A and IIII, 40 CFR 63.6590(c)(1))**
3. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to each engine in FGRICE, upon startup. **(40 CFR Part 63, Subparts A and ZZZZ, 40 CFR 63.6595)**

#### **Footnotes:**

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

## **FGPCWPMACT FLEXIBLE GROUP CONDITIONS**

### **DESCRIPTION**

Emission units subject to the PCWP MACT, 40 CFR 63, Subpart DDDD.

**Emission Unit:** EUFLAKERS, EUENERGY, EUPRESS, EUCOOLER, EUDRYER1, EUDRYER2, Miscellaneous Coating Operations.

### **POLLUTION CONTROL EQUIPMENT**

RTO1, wet scrubber.

### **I. EMISSION LIMITS**

Emission limit are in FGDRYERRTO and FGPRESCOOL

### **II. MATERIAL LIMITS**

1. The permittee shall only use non-HAP coatings in the Group 1 Miscellaneous Coating Operations. Non-HAP coating means a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds **(40 CFR 63.2241(a), 40 CFR 63.2292)**

### **III. PROCESS/OPERATIONAL RESTRICTIONS**

1. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CFR 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. **(40 CFR 63.2250(a))**
2. The permittee shall always operate and maintain the FGPCWPMACT sources, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). **(40 CFR 63.2250(b))**

### **IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall conduct initial compliance demonstrations that do not require performance tests upon initial startup. **(40 CFR 63.2261(b))**

2. The permittee shall keep a copy of each notification and report that was submitted to comply with Subpart DDDD, records related to startup, shutdown, and malfunction, and records of performance tests and performance evaluations. **(40 CFR 63.2282(a))**
3. In accordance with line (5) of Table 8 to Subpart DDDD, the permittee shall keep records to show that non-HAP coatings are used in Group 1 miscellaneous coating operations. **(40 CFR 63.2282(b))**

## **VII. REPORTING**

1. Semiannual reporting of monitoring and deviations shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(40 CFR 63.2281(b)(5), and 40 CFR 63.2281(g))**
2. The Permittee shall submit an initial notification as specified in 40 CFR 63.2280. **(40 CFR Part 63, Subparts A and DDDD)**
3. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.2280(d) and 40 CFR 63.9(h)(2)(ii). **(40 CFR 63.2260(c) and 40 CFR 63.2280(d))**
4. For each initial compliance demonstration required in Table 5 or 6 to Subpart DDDD that does not include a performance test, the permittee shall submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration. **(40 CFR 63.2280(d)(1))**
5. For each initial compliance demonstration required in Tables 5 and 6 to Subpart DDDD that includes a performance test conducted according to the requirements in Table 4 to Subpart DDDD, the permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2). **(40 CFR 63.2280(d)(2))**
6. The permittee shall notify the Department within 30 days before taking any of the following actions: **(40 CFR 63.2280(g))**
  - a) Modification or replacement of the control system for any process unit subject to the compliance options and operating requirements in Subpart DDDD.
  - b) Change a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.
7. The permittee shall submit all semiannual compliance reports as required by 40 CFR 63.2281(b). Each semiannual compliance report shall include the information in paragraphs 40 CFR 2281(c)(1) through (8). Deviations should be reported as specified in 40 CFR 2281(d) and (e). **(40 CFR 63.2281(c), (d), and (e))**

## **VIII. STACK/VENT RESTRICTIONS**

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

N/A

## **IX. OTHER REQUIREMENTS**

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDD for Plywood and Composite Wood Products upon initial startup. **(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).

## FGBOILERMACT FLEXIBLE GROUP CONDITIONS

### DESCRIPTION

Gas 1 Fuel Subcategory requirements for new Boilers/Process Heaters at major sources of Hazardous Air Pollutants per 40 CFR Part 63, Subpart DDDDD. These new boilers or process heaters must comply with this subpart upon startup.

**Emission Unit:** EUTOH, EUTFLTOS1

### POLLUTION CONTROL EQUIPMENT

NA

### I. EMISSION LIMIT(S)

N/A

### II. MATERIAL LIMIT(S)

1. The permittee shall only burn fuels as allowed in the Unit designed to burn Gas 1 Fuel Subcategory definition in 40 CFR 63.7575. **(40 CFR 63.7499(I))**

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

1. The permittee must meet the requirements in paragraphs (a)(1) and (3) of 40 CFR 63.7500, as listed below, except as provided in paragraphs (b) and (e) of 40 CFR 63.7500, stated in SC III.2 and SC III.3. The permittee must meet these requirements at all times the affected unit is operating. **(40 CFR 63.7500(a))**
  - a) The permittee must meet each work practice standard in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies to the boiler or process heater, for each boiler or process heater at the source. **(40 CFR 63.7500(a)(1))**
    - i. New boilers or process heaters with heat input capacity of less than or equal to five million Btu per hour in the units designed to burn gas 1 fuel subcategory must conduct a tune-up of the boiler or process heater every five years as specified in 40 CFR 63.7540, stated in SC IX.5. **(40 CFR 63.7500(e), 40 CFR Part 63, Subpart DDDDD Table 3)**
    - ii. New boilers or process heaters with heat input capacity of 10 million Btu per hour or greater, including EUTOH and EITFLTOS1, must conduct a tune-up of the boiler or process heater annually as specified in 40 CFR 63.7540, stated in SC IX.5. **(40 CFR Part 63, Subpart DDDDD Table 3)**
  - b) At all times, the permittee must operate and maintain any affected source (as defined in 40 CFR 63.7490, stated in SC IX.1), 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 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))**
2. As provided in 40 CFR 63.6(g), EPA may approve use of an alternative to the work practice standards. **(40 CFR 63.7500(b))**
3. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of 40 CFR Part 63, Subpart DDDDD, or the operating limits in Table 4 of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7500(e))**

4. The permittee must demonstrate initial compliance with the applicable work practice standards in Table 3 to 40 CFR Part 63, Subpart DDDDD within the applicable annual or five-year schedule as specified in 40 CFR 63.7515(d), stated in SC III.5, following the initial compliance date specified in 40 CFR 63.7495(a), stated in SC IX.4. Thereafter, you are required to complete the applicable annual or five-year tune-up as specified in 40 CFR 63.7515(d), stated in SC III.5. **(40 CFR 63.7510(g))**
5. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must:
  - a) Conduct the first annual tune-up no later than 13 months after the initial startup of the new or reconstructed boiler or process heater or the first five-year tune-up no later than 61 months after the initial startup of the new or reconstructed boiler or process heater.
  - b) Conduct an annual performance tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.5.a, or five-year performance tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.5.b. Each annual tune-up specified in 40 CFR 63.7540(a)(10) must be no more than 13 months after the previous tune-up. Each five-year tune-up specified in 40 CFR 63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up.**(40 CFR 63.7515(d))**

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

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.102(3))**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.201(3), 40 CFR 63.7560(b))**

1. The permittee must keep records according to paragraphs (a)(1) of 40 CFR 63.7555, as listed below. **(40 CFR 63.7555(a))**
  - a) 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 or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). **(40 CFR 63.7555(a)(1))**
2. The permittee's records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). **(40 CFR 63.7560(a))**
3. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. **(40 CFR 63.7560(b))**
4. The permittee must keep each record on site, or they must be accessible from on-site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records off site for the remaining three years. **(40 CFR 63.7560(c))**

#### **VII. REPORTING**

1. The permittee must meet the notification requirements in 40 CFR 63.7545 according to the schedule in 40 CFR 63.7545, both stated in SC VII.2 through SC VII.3, and in Subpart A of 40 CFR 63. **(40 CFR 63.7495(d))**
2. The permittee must submit to the Administrator all of the notifications in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (6), and 40 CFR 63.9(b) through (h) that apply to the permittee by the dates specified. **(40 CFR 63.7545(a))**

3. As specified in 40 CFR 63.9(b)(4) and (5), if the permittee starts up the new or reconstructed affected source on or after January 31, 2013, the permittee must submit an Initial Notification not later than 15 days after the actual date of startup of the affected source. **(40 CFR 63.7545(c))**
4. The permittee must submit each report in Table 9 of 40 CFR Part 63, Subpart DDDDD that applies. **(40 CFR 63.7550(a))**
5. Unless the EPA Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report, according to paragraph (h) of 40 CFR 63.7550, stated in SC VII.7, by the date in Table 9 of 40 CFR Part 63, Subpart DDDDD and according to the requirements in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below. For units that are subject only to a requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.5.a, or five-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.5.b, and not subject to emission limits or operating limits, the permittee may submit only an annual or five-year compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of 40 CFR 63.7550, as listed below, instead of a semi-annual compliance report. **(40 CFR 63.7550(b))**
  - a) The first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 CFR 63.7495, stated in SC IX.4, and ending on December 31 within one, two, or five years, as applicable, after the compliance date that is specified for the source in 40 CFR 63.7495, stated in SC IX.4. **(40 CFR 63.7550(b)(1))**
  - b) The first annual or five-year compliance report must be postmarked or submitted no later than March 15. **(40 CFR 63.10(a)(5), 40 CFR 63.7550(b)(2), 40 CFR 63.7550(b)(5))**
  - c) Annual and five-year compliance reports must cover the applicable one, two, or five-year periods from January 1 to December 31. **(40 CFR 63.7550(b)(3))**
  - d) Annual and five-year compliance reports must be postmarked or submitted no later than March 15. **(40 CFR 63.10(a)(5), 40 CFR 63.7550(b)(4), 40 CFR 63.7550(b)(5))**
6. A compliance report must contain the following information depending on how the permittee chooses to comply with the limits set in this rule. **(40 CFR 63.7550(c))**
  - a) If the facility is subject to the requirements of a tune up the permittee must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii), (xiv), and (xvii) of 40 CFR 63.7550. **(40 CFR 63.7550(c)(1))**
  - b) 40 CFR 63.7550(c)(5) is as follows:
    - i. Company and Facility name and address. **(40 CFR 63.7550(c)(5)(i))**
    - ii. Process unit information, emissions limitations, and operating parameter limitations. **(40 CFR 63.7550(c)(5)(ii))**
    - iii. Date of report and beginning and ending dates of the reporting period. **(40 CFR 63.7550(c)(5)(iii))**
    - iv. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual tune-up according to 40 CFR 63.7540(a)(10), stated in SC IX.5.a, or five-year tune-up according to 40 CFR 63.7540(a)(12), stated in SC IX.5.b. Include the date of the most recent burner inspection if it was not done annually or on a five-year period and was delayed until the next scheduled or unscheduled unit shutdown. **(40 CFR 63.7550(c)(5)(xiv))**
    - v. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. **(40 CFR 63.7550(c)(5)(xvii))**
7. The permittee must submit the reports according to the procedures specified in paragraph (h)(3) of 40 CFR 63.7550, as listed below. **(40 CFR 63.7550(h))**
  - a) The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. **(40 CFR 63.7550(h)(3))**

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

N/A

### **IX. OTHER REQUIREMENT(S)**

1. The permittee must be in compliance with the work practice standards of 40 CFR Part 63, Subpart DDDDD. **(40 CFR 63.7505(a))**
2. 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 (a)(10) through (13) of 40 CFR 63.7540, as listed below. **(40 CFR 63.7540(a))**
  - a) If the boiler or process heater has a heat input capacity of 10 million Btu per hour or greater, the permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540, 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 perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. 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). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. **(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, a report containing the information in paragraphs (a)(10)(vi)(A) through (C) of 40 CFR 63.7540, 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) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. **(40 CFR 63.7540(a)(10)(vi)(C))**
  - b) If the boiler or process heater has a heat input capacity of less than or equal to five million Btu per hour and the unit is in the units designed to burn gas 1 subcategory, the permittee must conduct a tune-up of the boiler or process heater every five years as specified in paragraphs (a)(10)(i) through (vi) of 40 CFR 63.7540 to demonstrate continuous compliance. The permittee may delay the burner inspection specified in paragraph (a)(10)(i) of 40 CFR 63.7540 until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. **(40 CFR 63.7540(a)(12))**
  - c) 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))**

3. Table 10 of 40 CFR Part 63, Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 applies to the permittee. **(40 CFR 63.7565)**

**Footnotes:**

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

## FGFACILITY CONDITIONS

### DESCRIPTION

The following conditions apply source-wide to all process equipment including equipment covered by other permits, grand-fathered equipment, and exempt equipment.

### POLLUTION CONTROL EQUIPMENT

Baghouses, dry electrostatic precipitator, thermal oxidizer, wet scrubber, Low NOx burners.

#### I. EMISSION LIMITS

N/A

#### II. MATERIAL LIMITS

N/A

#### III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate any equipment at the facility subject to an emission limitation unless an approvable malfunction abatement plan (MAP) as described in Rule 911(2), for each emission unit and emission control device at the facility, has been submitted to the AQD District Supervisor not less than 60 days before startup of EUPRESS, as defined under 40 CFR 63.2292, and is implemented and maintained. The MAP shall, at a minimum, specify the following:
  - a) A complete preventative maintenance program including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.
  - b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.
  - c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.
  - d) A description of good design, engineering, and combustion practices for each process, as applicable.

If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the MAP within 45 days if new equipment is installed or upon request from the District Supervisor. The permittee shall submit the MAP and any amendments to the MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the MAP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. **(R 336.1205, R 336.1224, R 336.1225, R 336.1702, R 336.1910, R 336.1911, R 336.2803, R 336.2804, R 336.2810)**

2. The permittee shall submit a nuisance minimization plan for fugitive dust to the AQD District Supervisor not less than 60 days before startup of EUPRESS, as defined under 40 CFR 63.2292. The permittee shall implement and maintain the plan, as described in the plan, upon startup of EUPRESS, as defined under 40 CFR 63.2292. **(R 336.1205, R 336.2803, R 336.2804, R 336.2810)**

3. The permittee shall not operate EUFLAKERS, EUENERGY, EUPRESS, EUCOOLER, EUDRYER1, or EUDRYER2 unless an acceptable plan that describes how emissions will be minimized during all startups, shutdowns, and malfunctions has been submitted to the AQD District Supervisor. The plan shall incorporate procedures recommended by the equipment manufacturers as well as incorporating standard industry practices. **(R 336.1205, R 336.1224, R 336.1225, R 336.1301, R 336.1331, R 336.1911, R 336.1912, R 336.2803, R 336.2804, R 336.2810)**

#### **IV. DESIGN/EQUIPMENT PARAMETERS**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

N/A

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

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall maintain records of all information necessary for all notifications and reports as specified in these special conditions as well as that information necessary to demonstrate compliance with the emission limits of this permit. This information shall include, but shall not be limited to the following:
  - a) Compliance tests and any testing required under the special conditions of this permit.
  - b) Monitoring data.
  - c) All calculations or documents necessary to show compliance with the limits contained in this permit.

The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.2803, R 336.2804, R 336.2810, 40 CFR 52.21(j))**

#### **VII. REPORTING**

1. Within 15 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than startup of EUPRESS, as defined under 40 CFR 63.2292. **(R 336.1201(7)(a), 40 CFR 63.9(b)(4)(v))**
2. The permittee shall notify the Department if a change in land use occurs for property classified as industrial or as a public roadway, where this classification was relied upon to demonstrate compliance with Rule 225(1). The permittee shall submit the notification to the AQD District Supervisor, within 30 days of the actual land use change. Within 60 days of the land use change, the permittee shall submit to the AQD District Supervisor a plan for complying with the requirements of Rule 225(1). The plan shall require compliance with Rule 225(1) no later than one year after the due date of the plan submittal. **(R 336.1225(4))**
3. Within 15 days after achieving the maximum production rate, the permittee, or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, that the maximum production rate has been achieved. **(R 336.1201(7)(a))**

#### **VIII. STACK/VENT RESTRICTIONS**

N/A

## **IX. OTHER REQUIREMENTS**

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and DDDD, as they apply to the facility, upon initial startup. **(40 CFR Part 63 Subparts A and DDDD)**
2. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and DDDDD, as they apply to the facility. **(40 CFR Part 63, Subparts A and DDDDD)**
3. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subpart A and Subpart JJJJ, as they apply to the facility, upon startup. **(40 CFR Part 63, Subparts A and JJJJ)**
4. The permittee shall comply with the provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subpart A and Subpart IIII, as they apply to the facility. **(40 CFR Part 60, Subparts A and IIII)**
5. The permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR, Part 63, Subpart A and Subpart ZZZZ, as they apply to the facility, upon startup. **(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).