

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

MARCH 17, 2021

**PERMIT TO INSTALL
35-20A**

**ISSUED TO
BESSEMER PLYWOOD CORPORATION**

**LOCATED AT
1000 YALE AVENUE
BESSEMER, MICHIGAN 49911**

**IN THE COUNTY OF
GOGEBIC**

**STATE REGISTRATION NUMBER
N1393**

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: March 9, 2021	
DATE PERMIT TO INSTALL APPROVED: March 17, 2021	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 ₂ 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 ₂ S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO _x	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 ₂	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.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Flexible Group ID
EUWOODBOILER1	26.8 MMBtu/hr Wood-fired Boiler with a Multiclone Collector.	FGWOODBOILERS
EUWOODBOILER2	21.9 MMBtu/hr Wood-fired Boiler with a Multiclone Collector.	FGWOODBOILERS
EUGASBOILER	12.6 MMBtu/hr Natural Gas-fired Boiler.	NA
EUFUELSYSTEM	Boiler House fuel transfer system including plugger, composer hogger, trim hogger, trim saw, core saw, and panel saw and vents indoors.	NA
EUDRYER1	20-section Coe veneer dryer, Natural Gas-fired.	NA
EUDRYER3	Wood Veneer Dryer No. 3 heated with a Natural Gas-fired 16 MMBTU/hr Burner.	FGTRANSITION
EUSANDER	Surface finishing sander for plywood product, controlled with two cyclone/bagfilters in parallel.	NA
EUSTACKER	Vacuum lift system that lifts green veneer sheets off of the green chain and carries them to a stacker where the sheets are stacked, emissions controlled by a cyclone and vents indoors.	NA
EUGLUESPREADER	Two (2) 60-inch globe glue spreaders.	NA
EUDRYER4	Wood Veneer Dryer No. 4 heated with a Natural Gas-fired 40 MMBTU/hr Burner.	FGTRANSITION

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.

**EUWOODBOILER1
 EMISSION UNIT CONDITIONS**

DESCRIPTION

26.8 MMBtu/hr Wood-fired Boiler with a Multiclone Collector.

Flexible Group ID: FGWOODBOILERS

POLLUTION CONTROL EQUIPMENT

Multiclone Collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.50 lb per 1,000 lb exhaust gases, corrected to 50% excess air	Daily	EUWOODBOILER1	SC VI.2	R 336.1331
2. PM	14.7 pph	Daily	EUWOODBOILER1	SC VI.2	R 336.1331
3. PM10	0.50 lb per 1,000 lb exhaust gases, corrected to 50% excess air	Daily	EUWOODBOILER1	SC VI.2	40 CFR 52.21(c) & (d)
4. PM10	14.7 pph	Daily	EUWOODBOILER1	SC VI.2	40 CFR 52.21(c) & (d)

II. MATERIAL LIMIT(S)

1. Applicant shall not burn in EUWOODBOILER1 any wood, wood residue, or wood waste, which is painted or treated with wood preservatives; or any other waste materials not identified in the application. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**
2. The permittee shall not fire more than 30 dry tons of wood fuel in EUWOODBOILER1 per calendar day. **(R 336.1205, R 336.1901)**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUWOODBOILER1 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 manufacturer, if available, as well as incorporating standard industry practices. **(R 336.1911, R 336.1912)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUWOODBOILER1 unless the two multiclones are installed and operating properly. **(R 336.1910)**

V. TESTING/SAMPLING

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

1. Upon the request of the District Supervisor, the permittee shall verify PM and PM10 emission rates from EUWOODBOILER1 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	40 CFR Part 51, Appendix M

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, 40 CFR 52.21(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the wood fuel usage for EUWOODBOILER1 on a daily basis. **(R 336.1205(1)(a) & (3))**
2. The permittee shall keep, in a format acceptable to the AQD District Supervisor, average hourly PM and PM10 emission records for EUWOODBOILER1 calculated on a daily basis using the total daily wood fuel usage rate and daily hours of operation. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205, R 336.1331)**
3. The permittee shall keep daily wood fuel usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of wood fuel used, in pounds, on an average daily basis. The records must indicate the total amount of wood fuel used in EUWOODBOILER1. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205, R 336.1331)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWOODBOILER1	32	125	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

**EUWOODBOILER2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

21.9 MMBtu/hr Wood-fired Boiler with a Multiclone Collector.

Flexible Group ID: FGWOODBOILERS

POLLUTION CONTROL EQUIPMENT

Multiclone Collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.50 lb per 1,000 lb exhaust gases, corrected to 50% excess air	Daily	EUWOODBOILER2	SC VI.2	R 336.1331
2. PM	15.1 pph	Daily	EUWOODBOILER2	SC VI.2	R 336.1331
3. PM10	0.50 lb per 1,000 lb exhaust gases, corrected to 50% excess air	Daily	EUWOODBOILER2	SC VI.2	40 CFR 52.21(c) & (d)
4. PM10	15.1 pph	Daily	EUWOODBOILER2	SC VI.2	40 CFR 52.21(c) & (d)

II. MATERIAL LIMIT(S)

1. Applicant shall not burn in EUWOODBOILER2 any wood, wood residue, or wood waste, which is painted or treated with wood preservatives; or any other waste materials not identified in the application. **(R 336.1205, R 336.1225, 40 CFR 52.21(c) & (d))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUWOODBOILER2 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 manufacturer, if available, as well as incorporating standard industry practices. **(R 336.1911, R 336.1912)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUWOODBOILER2 unless the two multiclones are installed and operating properly. **(R 336.1910)**

V. TESTING/SAMPLING

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

1. Upon the request of the District Supervisor, the permittee shall verify PM and PM10 emission rates from EUWOODBOILER2 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	40 CFR Part 51, Appendix M

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, 40 CFR 52.21(c) & (d))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall monitor and record the wood fuel usage for EUWOODBOILER2 on a daily basis. **(R 336.1205(1)(a) & (3))**
2. The permittee shall keep, in a format acceptable to the AQD District Supervisor, average hourly PM and PM10 emission records for EUWOODBOILER2 calculated on a daily basis using the total daily wood fuel usage rate and daily hours of operation. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205, R 336.1331)**
3. The permittee shall keep daily wood fuel usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of wood fuel used, in pounds, on an average daily basis. The records must indicate the total amount of wood fuel used in EUWOODBOILER2. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205, R 336.1331)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVWOODBOILER2	32	125	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

EUFUELSYSTEM EMISSION UNIT CONDITIONS

DESCRIPTION

Boiler House fuel transfer system including plugger, composer hogger, trim hogger, trim saw, core saw, and panel saw that vent indoors.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Fabric Filter Collector

I. EMISSION LIMIT(S)

1. Visible emissions from EUFUELSYSTEM shall not exceed a six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity. **(R 336.1301)**

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall implement and maintain a Best Management Practices Plan (BMPP) for housekeeping and prevention of fugitive particulate emissions. The BMPP shall, at a minimum, specify the following:
 - a) A detailed plan for housekeeping activities, including identification of the supervisory personnel responsible for overseeing these activities, a description of the items or conditions that shall be addressed by these activities, and the frequency at which the housekeeping activities are performed.
 - b) A detailed plan for addressing/controlling fugitive particulate emissions, including proper cleanup and future emissions prevention in case of malfunctions/inadequate and/or failure of particulate control systems.
 - c) A description of the corrective procedures or operational changes that shall be taken in the event of a failure to follow the housekeeping activities/procedures causing some for fugitive particulate emissions.

If at any time the BMPP fails to address or inadequately addresses activities or corrective procedures for housekeeping and prevention of fugitive particulate emissions, the permittee shall amend the BMPP within 90 days after such an event occurs. The permittee shall also amend the BMPP within 45 days, if new equipment is installed that necessitates an update to the BMPP or upon request from the AQD District Supervisor. The permittee shall submit any amendments to the BMPP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the BMPP or amended BMPP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures and/or operational changes to achieve compliance with all applicable emission limits and permit conditions. **(R 336.1301)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUFUELSYSTEM unless the fabric filter collector is installed and operating properly. **(R 336.1910)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. There shall be no exhaust gases from EUFUELSYSTEM released into the ambient air. All emissions shall be fugitive emissions released within the building. **(R 336.1225, R 336.1901)**

IX. OTHER REQUIREMENT(S)

NA

EUDRYER3 EMISSION UNIT CONDITIONS
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DESCRIPTION

Wood Veneer Dryer No. 3 heated with a Natural Gas-fired 16 MMBTU/hr Burner.

Flexible Group ID: FGTRANSITION

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	0.20 pph	Daily	EUDRYER3	SC VI.2	R 336.1702(a)
2. Formaldehyde	0.008 pph	Daily	EUDRYER3	SC VI.2	R 336.1224

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The operating temperature in EUDRYER3 shall not exceed 450 degrees Fahrenheit. **(R 336.1225, R 336.1702)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the operating temperature of EUDRYER3 on a daily basis. **(R 336.1225, R 336.1301, R 336.1702)**
2. The permittee shall keep, in a satisfactory manner, daily records of the operating temperature for EUDRYER3. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225, R 336.1301, R 336.1702)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVDRYER 3C	NA	35	R 336.1225
2. SVDRYER 3H	NA	50	R 336.1225

IX. OTHER REQUIREMENT(S)

NA

EUSANDER EMISSION UNIT CONDITIONS
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DESCRIPTION

Surface finishing sander for plywood product, controlled with two cyclone/bagfilters in parallel.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Two cyclone/bagfilters in parallel.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	0.01 lb per 1,000 lb exhaust gases	Daily	EUSANDER	SC VI.1	R 336.1331(c)
2. PM10	0.01 lb per 1,000 lb exhaust gases	Daily	EUSANDER	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSANDER unless the cyclone/bagfilters are installed, maintained, and operated in a satisfactory manner. **(R 336.1301, R 336.1331, and R 336.1910)**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep, in a satisfactory manner, daily records of the operating hours for EUSANDER. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1205)**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. Within 6 months of permit issuance or another timeframe if requested by the permittee and approved by the AQD District Supervisor, there shall be no exhaust gases from EUSANDER released into the ambient air. All emissions shall be fugitive emissions released within the building. **(R 336.1225, R 336.1901)**

IX. OTHER REQUIREMENT(S)

NA

EUSTACKER EMISSION UNIT CONDITIONS

DESCRIPTION

Vacuum lift system that lifts green veneer sheets off of the green chain and carries them to a stacker, where the sheets are stacked, emissions controlled by a cyclone and vented indoors.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Cyclone

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	1.44 pph	Daily	EUSTACKER	SC IV.1	R 336.1331(c)
2. PM	0.01 lb per 1,000 lb exhaust gases	Daily	EUSTACKER	SC IV.1	R 336.1331(c)

3. Visible emissions from EUSTACKER shall not exceed a six-minute average of 5 percent opacity. (R 336.1301, R 336.1331)

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate EUSTACKER unless the cyclone is installed, maintained, and operated in a satisfactory manner. (R 336.1301, R 336.1331, R 336.1910)

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

EUGLUESREADER EMISSION UNIT CONDITIONS

DESCRIPTION

Two (2) 60-inch globe glue spreaders.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. VOC	3.0 tpy	12-month rolling time period as determined at the end of each calendar month	EUGLUESREADER	SC VI.1	R 336.1225, R 336.1702(a)

2. There shall be no visible emissions from EUGLUESREADER. (R 336.1301)

II. MATERIAL LIMIT(S)

1. The permittee shall not use more than 500,000 pounds of resin in EUGLUESREADER per calendar month. (R 336.1225, R 336.1702(a))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep the following information on a monthly basis for EUGLUESREADER:
 - a) Pounds of resin used in EUGLUESREADER.
 - b) VOC content, in pounds per pound, of resin used.
 - c) Aggregate VOC emission calculations determining the monthly emission rate of each in tons per calendar month.
 - d) Aggregate VOC emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
 - e) The hours of operation of each of the two sixty inch globe glue spreaders.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1225, R 336.1702(a))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

1. There shall be no exhaust gases from either of the two sixty inch globe glue spreaders released into the ambient air. All emissions shall be fugitive emissions released within the building. **(R 336.1225, R 336.1901)**

IX. OTHER REQUIREMENT(S)

NA

**EUDRYER4
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Wood Veneer Dryer No. 4 heated with a Natural Gas-fired 40.6 MMBTU/hr Burner.

Flexible Group ID: FGTRANSITION

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. NOx	6.0 pph	Hourly	EUDRYER4	SC V.1	R 336.1205, 40 CFR 52.21(c) & (d)
2. CO	3.3 pph	Hourly	EUDRYER4	SC V.1	R 336.1205, 40 CFR 52.21(d)
3. PM	3.2 pph	Hourly	EUDRYER4	SC V.1	R 336.1205, R 336.1331
4. PM10	3.2 pph	Hourly	EUDRYER4	SC V.1	R 336.1205, 40 CFR 52.21(c) & (d)
5. PM2.5	3.2 pph	Hourly	EUDRYER4	SC V.1	R 336.1205, 40 CFR 52.21(c) & (d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Hardwood or non-resinous wood	65,000 MSF 3/8	12-month rolling time period as determined at the end of each calendar month	EUDRYER4	SC VI.2	R 336.1205 40 CFR 52.21(c)&(d)

2. The permittee shall burn only pipeline quality natural gas in EUDRYER4 (**R 336.1205, R 336.1224, R 336.1225, R 336.1702, 40 CFR 52.21(c) & (d)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The maximum design heat input capacity for the burners of EUDRYER4 shall not exceed a maximum of 40.6 MMBTU per hour on a fuel heat input basis. (**R 336.1205, R 336.1224, R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d)**)

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of initial startup but not later than 12-month following the issuance of this permit the permittee shall verify NOx, CO, PM, PM10, and PM2.5 emission rates from EUDRYER4 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
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
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

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, 40 CFR 52.21(c) & (d))

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 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 336.1205, 40 CFR 52.21(c) & (d))
2. The permittee shall monitor and record the natural gas (in MMscf) and the amount of hardwood or non-resinous wood (in MSF 3/8) usage rate in EUDRYER4 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, 40 CFR 52.21(c) & (d))

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Diameter / Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVHEAT1	42	95	R 336.1225, 40 CFR 52.21(c) & (d)
2. SVCOOL1	48	60	R 336.1225, 40 CFR 52.21(c) & (d)
3. SVCOOL2	48	60	R 336.1225, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

NA

FLEXIBLE GROUP SPECIAL CONDITIONS

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGWOODBOILERS	Two (2) Wood-fired Boilers.	EUWOODBOILER1, EUWOODBOILER2
FGTRANSITION	Operation of Bessemer Plywood during the transition period from EUDRYER3 and EUDRYER4.	EUDRYER3, EUDRYER4

**FGWOODBOILERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two (2) Wood-fired Boilers each with a Multiclone Collector for control.

Emission Unit: EUWOODBOILER1, EUWOODBOILER2

POLLUTION CONTROL EQUIPMENT

EUWOODBOILER1 – Multiclone Collector
 EUWOODBOILER2 - Multiclone Collector

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	570 lb/calendar day	Calendar Day	FGWOODBOILERS	SC VI.3	R 336.1331
2. PM	62 tpy	12-month rolling time period as determined at the end of each calendar month	FGWOODBOILERS	SC VI.4	R 336.1205
3. PM10	570 lb/calendar day	Calendar Day	FGWOODBOILERS	SC VI.3	40 CFR 52.21(c) & (d)
4. PM10	62 tpy	12-month rolling time period as determined at the end of each calendar month	FGWOODBOILERS	SC VI.4	R 336.1205

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Wood fuel	11,100 tpy	12-month rolling time period as determined at the end of each calendar month	FGWOODBOILERS	SC VI.2	R 336.1205

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

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 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. The permittee shall keep records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
2. The permittee shall monitor and record the wood fuel usage for FGWOODBOILERS on a monthly and 12-month rolling basis. **(R 336.1205(1)(a) & (3))**
3. The permittee shall keep daily wood fuel usage records, in a format acceptable to the AQD District Supervisor, indicating the amount of wood fuel used, in tons, on a monthly and 12-month rolling basis. The records must indicate the total amount of wood fuel used in FGWOODBOILERS. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R 336.1331)**
4. The permittee shall monitor and record, in a satisfactory manner, emissions of PM and PM10, from FGWOODBOILERS, on a monthly and 12-month rolling basis. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

FGTRANSITION FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Operation of Bessemer Plywood during the transition period from EUDRYER3 and EUDRYER4.

Emission Unit: EUDRYER3, EUDRYER4

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. CO	19 tpy ^A	12-month rolling time period as determined at the end of each calendar month	FGTRANSITION	SC VI. 2	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)
2. NOx	34 tpy	12-month rolling time period as determined at the end of each calendar month	FGTRANSITION	SC VI. 2	R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)
3. PM	5 tpy ^A	12-month rolling time period as determined at the end of each calendar month	FGTRANSITION	SC VI. 2	R 336.1205(1)(a) & (3),
4. PM10	5 tpy ^A	12-month rolling time period as determined at the end of each calendar month	FGTRANSITION	SC VI. 2	R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)
5. PM2.5	5 tpy ^A	12-month rolling time period as determined at the end of each calendar month	FGTRANSITION	SC VI. 2	R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)

^A This limit will remain in effect until the transition period is complete. The transition period is complete the date following shakedown of EUDRYER4 or the first 12-months following of issuance of this permit to install, whichever is later and EUDRYER3 is permanently shut down.

II. MATERIAL LIMIT(S)

NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not dry hardwood or non-resinous wood simultaneously in EUDRYER 3 and EUDRYER4 during the transition period. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**
2. The permittee shall not operate EUDRYER3 for more than 7,000 hours during the transition period. **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a), 40 CFR 52.21(c) & (d))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

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 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. The permittee shall keep records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
2. The permittee shall monitor and record, in a satisfactory manner, emissions of CO, NO_x, PM, PM₁₀, and PM_{2.5} from FGTRANSITION, on a monthly and 12-month rolling basis during the transition period. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
3. The permittee shall keep, in a satisfactory manner, a record of the monthly and 12-month rolling total hours of operation for EUDRYER3 during the transition period. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**
4. The permittee shall keep, in a satisfactory manner acceptable to the AQD District Supervisor, a log of the start and end times for when they are drying hardwood or non-resinous wood within EUDRYER3 and EUDRYER4 during the transition period. 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 336.1702, 40 CFR 52.21(c)&(d))**

VII. REPORTING

1. Within 30 days after completion of the transition period, the permittee, or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. The transition period is complete the date following shakedown of EUDRYER4 or the first 12-months following of issuance of this permit to install, whichever is later and EUDRYER3 is permanently shut down. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the requirements of FGTRANSITION until the transition period for FGTRANSITION is complete. The transition period is complete the date following shakedown of EUDRYER4 or the first 12-months following of issuance of this permit to install, whichever is later, and EUDRYER3 is permanently shut down. Upon completion of the transition period, the conditions of FGTRANSITION are null and void. **(R 336.1201)**

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

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. PM	89.4 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a) & (3)
2. PM10	89 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)
3. PM2.5	89 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d)
4. CO	89 tpy*	12-month rolling time period as determined at the end of each calendar month	FGFACILITY	SC VI.2	R 336.1205(1)(a) & (3), 40 CFR 52.21(d)

* Limited by FGWOODBOILERS

II. MATERIAL LIMIT(S)

NA

Note: Material limits restricting the potential to emit for EUWOODBOILER1 and EUWOODBOILER2 of the stationary source are found under FGWOODBOILERS.

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

NA

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 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. The permittee shall keep records on file at the facility and make them available to the Department upon request. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**

2. The permittee shall monitor and record, in a satisfactory manner, emissions of CO, PM, PM10, and PM2.5 from FGFACILITY, on a monthly and 12-month rolling basis. **(R 336.1205(1)(a) & (3), 40 CFR 52.21(c) & (d))**

VII. REPORTING

NA

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA