

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

EFFECTIVE DATE: February 14, 2018

REVISION DATE: March 19, 2020

ISSUED TO

LOUISIANA PACIFIC CORPORATION - NEWBERRY PLANT

State Registration Number (SRN): N0780

LOCATED AT

7299 North County Road 403, Newberry, Luce County, Michigan 49868

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-N0780-2018a

Expiration Date: February 14, 2023

Administratively Complete ROP Renewal Application Due Between
September 14, 2021 and September 14, 2022

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

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-N0780-2018a

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

Michigan Department of Environment, Great Lakes, and Energy

Ed Lancaster, Marquette District Supervisor

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AUTHORITY AND ENFORCEABILITY

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

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

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

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

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

A. GENERAL CONDITIONS

Permit Enforceability

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

General Provisions

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

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

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

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

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

Testing/Sampling

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

Monitoring/Recordkeeping

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

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following: **(R 336.1213(3)(c))**
- Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; “based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete.” The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- The applicable requirements are included and are specifically identified in the ROP.
 - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

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

Revisions

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

Reopenings

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

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(9))**

Stratospheric Ozone Protection

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

Risk Management Plan

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

Emission Trading

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

Permit to Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, EGLE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

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

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

B. SOURCE-WIDE CONDITIONS

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

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

SOURCE-WIDE CONDITIONS

POLLUTION CONTROL EQUIPMENT

See Emission Unit Descriptions

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Each Individual HAP	9.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.2	R 336.1205(1)
2. Aggregate HAPs	24.9 tpy ²	12-month rolling time period as determined at the end of each calendar month	Source-Wide	SC VI.2	R 336.1205(1)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.² **(R 336.1205(3))**

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 10th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² **(R 336.1205(3))**

2. The permittee shall keep the following information on a monthly basis for SOURCE-WIDE:
 - a. Gallons or pounds of each HAP containing material used.
 - b. Where applicable, gallons or pounds of each HAP containing material reclaimed.
 - c. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
 - d. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.
 - e. Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.

The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.² **(R 336.1205(3))**

See Appendices 3, 4, and 7

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a Fugitive Dust Control Program approved by the Air Quality Division District Supervisor to limit fugitive dust emissions from the roadways, the material storage piles, stock pile areas, and other operations throughout the plant, including the keeping of records of fugitive dust control activities and dates carried out. The permittee shall submit these records with the semiannual reports required under Section B. Source-Wide Conditions VII.4.² **(R 336.1213(3))**

Footnotes:

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

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

C. EMISSION UNIT CONDITIONS

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

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

EMISSION UNIT SUMMARY TABLE

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

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUKONUSTOH	Thermal Oil Heaters process group including two 19.9 million BTU per hour Korus thermal oil heaters fired by wood fuel with two economizers. The economizers are heat exchangers that do not combust any fuel. The Korus thermal oil heaters are each controlled by an individual cyclone dust collector and are both exhausted into Baghouse4.	1984 1996	NA
EUGEKATOH	One Geka thermal oil heater re-permitted in 2003 to burn natural gas, rated at a maximum heat input of 40 million BTU per hour. This unit was originally installed under Air Use Permit #392-87, and previously burned sander dust. Permit #392-87 was voided in 1996.	1987 2003	NA
EUDRYERRC	Dryer System consisting of: a replacement triple pass dryer drum with heat provided by the existing 42 million BTU per hour wood fired McConnell burner and/or three independently operated Maxon natural gas burners (19.5 million Btu per hour each) and an exhaust gas recirculation system (as needed). The dryer capacity is 16.5 tons per hour of dried flakes. A portion of the press (EUPRESS) emissions are routed to the Dryer System. Emissions are controlled by a wet electrostatic precipitator (WESP) and a regenerative thermal oxidizer (RTO). The wet ESP is an E-tube unit with two separately energized electrical sections operating in parallel.	2005	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUPRESS	Press System including the Board Press and fugitive emissions from the mat forming line. The press has 17 flights with vented platens on all flights that route a portion of the Press System exhaust to the Dryer System for control. The vented platen press emissions are controlled by the Dryer System WESP and RTO and are accounted for in the emission limits under EUDRYERRC. The limits for EUPRESS are applicable to the portion of the exhaust that is not sent to the Dryer System.	1985 1996 2019	NA
EU COATING	Process group consisting of a paint booth with dry exhaust filters and a natural gas-fired drying oven for painting grooved areas on siding, and an edge seal paint booth with dry exhaust filters.	1992 1996	NA
EUBAGHOUSE1	Process group exhausts controlled by the Carter-Day Baghouse1 which can include the Diamond roll screener, Baghouse1 outfeed, and collected fines from Baghouse5.	1984 1996 2005	NA
EUBAGHOUSE2	Process group consisting of exhausts from the mat forming line, including the flake resin application operation, the flying cutoff saw, and the flake reclaim system. The flake reclaim system includes the flake formers, flake conveyors and mat side suction. EUBAGHOUSE2 is controlled by Carter-Day Baghouse2.	1985 1996 2005	NA
EUBAGHOUSE3	Process group consisting of thermal oil heater fuel metering bin and waferizer green fines blower, all controlled by Carter-Day Baghouse3.	1989 1996	NA
EUBAGHOUSE5	Process group consisting of exhausts from the two dry flake day bins, conveyors and screener all controlled by Carter Day Baghouse5.	1990	NA
EUBAGHOUSE6	Process consisting of exhausts from the dryer burner fuel bin controlled by Flex-Kleen Baghouse6. Wood fines discharge from Baghouse1 passes thru a hammer mill then are blown to dryer burner fuel storage bin.	1990	NA
EUBAGHOUSE8	Process group consisting of exhausts from the groover booth and hammermill, which includes the 1 st and 2 nd pass trim saws and 1 st pass clean-up conveyor all controlled by Carter-Day Baghouse8.	2005	NA
EUBAGHOUSE9	Process group consisting of exhausts from the fines recovery system, which includes a metering bin, controlled by Carter-Day Baghouse9.	2005	NA

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUCLEANERS	One Safety-Kleen cold cleaner, with air/vapor interface less than 10 square feet, using non-chlorinated solvent. Cold cleaner is equipped with a cover.	1994	FGCOLDCLEANERS
EUDRYBACKUP	Gasoline fired, spark ignition emergency dryer back-up generator.	1990	FGSIRICEMACT
EUTOHDIESEL	Diesel fired, compression ignition, emergency Konus backup generator.	2015	FGCIRICEMACTNEW
EUFIREPUMP	Diesel fired, compression ignition, emergency fire water pump.	1985	FGCIRICEMACT

**EUKONUSTOH
 EMISSION UNIT CONDITIONS**

DESCRIPTION:

Thermal Oil Heaters process group including two 19.9 million BTU per hour Korus thermal oil heaters fired by wood fuel with two economizers. The economizers are heat exchangers that do not combust any fuel.

EUKONUSTOH is a CAM subject emission unit subject to the requirements of 40 CFR Part 64. The CAM subject pollutant for this emission unit is PM.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT:

Individual cyclone dust collector for each heater exhausted into Baghouse #4. This is a CAM subject control device.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM-10	0.081 lb per 1000 lbs of exhaust gases, corrected to 50% excess air ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
2. PM-10	4.3 pph ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
3. PM	0.081 lb per 1000 lbs of exhaust gases, corrected to 50% excess air ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3) R 336.1331
4. PM	4.3 pph ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
5. CO	0.87 lb/MMBTU heat input ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
6. CO	26.0 pph ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
7. CO	93.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUKONUSTOH	SC VI.1	R 336.1205(3)
8. NO _x	0.4 lb/MMBTU heat input ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
9. NO _x	15.5 pph ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)
10. VOC	0.77 pph ²	Hourly	EUKONUSTOH	SC V.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. Wood Fuel	24,000 tons of wood per year ²	12-month rolling time period as determined at the end of each calendar month	EUKONUSTOH	SC VI.2	R 336.1205(3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUKONUSTOH, when fired with wood, unless the cyclone dust collectors and Baghouse #4 are operating properly.² (R 336.1910)
2. Except for transitional periods not longer than six hours the permittee shall not operate both Konus thermal oil heaters simultaneously on wood fuel.² (R 336.1205(3))
3. The permittee shall not operate EUKONUSTOH unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of EUKONUSTOH resumes regular operation after the project, permittee shall verify PM₁₀, PM, CO, NO_x, and VOC emission rates from EUKONUSTOH by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol.

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM ₁₀	40 CFR Part 51, Appendix M
NO _x	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A

No less than 30 days prior to testing, the permittee shall submit a complete test protocol to the AQD Technical Programs Unit and District Office. The AQD must approve the final protocol 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.² (R 336.1205(3), R 336.1702, R 336.1902, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804)

2. The permittee shall conduct daily visible emissions observations from EUKONUSTOH using EPA Method 22 or an alternate test method approved by the AQD. The AQD District Supervisor must approve an alternate test method prior to testing.² (R 336.2001, R 336.2003, R 336.2004)
3. The permittee shall verify the PM₁₀, PM, CO, NO_x, and VOC emission rates from EUKONUSTOH, at a minimum, every five years from the date of the last test. (R 336.1213(3), 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 336.1213(3)(b)(ii))

1. The permittee shall keep a monthly record of the amount of carbon monoxide emitted from the two Konus thermal oil heaters, calculated using the hourly average emission rate from the most recent available emissions testing. By the tenth day of each calendar month, the permittee shall calculate the carbon monoxide emissions for the previous 12-calendar month period. These records shall be submitted with the semi-annual reporting of monitoring and deviations. These records shall be maintained on-site and made available to Department personnel upon request.² (R 336.1205(3))
2. The permittee shall keep a monthly record of the weight of wood burned in the two Konus thermal oil heaters, measured as received. By the 10th day of each calendar month, the permittee shall calculate the weight of wood burned, as received, for the previous 12-calendar month period. These records shall be submitted with the

semi-annual reporting of monitoring and deviations. These records shall be maintained on-site and made available to Department personnel upon request.² **(R 336.1201(3))**

3. The permittee shall keep a daily record of hours of operation and fuel type for both Konus thermal oil heaters. Any hours in which both Konus thermal oil heaters are operated simultaneously on wood as permitted in SC III.2 shall be included in these records.² **(R 336.1205(3))**
4. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices.² **(R 336.1301, R 336.1331, R 336.1910)**
5. The permittee shall record a daily visual opacity observation as an indicator of proper operation of the dust collector. The indicator is the presence of visible emissions.² **(R 336.1201(3), 40 CFR 64.6(c)(1)(i and ii))**
6. An excursion is a departure from the indicator range of no visible emissions. The indicator of no visible emissions indicates normal operations.² **(R 336.1201(3), 40 CFR 64.6(c)(2))**
7. Upon detecting an excursion or exceedance, the permittee shall restore the process to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). The permittee shall perform and record the results of a daily visible emission check using US EPA Method 22 based procedures during routine maximum operating conditions. If any visible emissions (excursion) are observed, the AQD approved Malfunction Abatement Plan corrective procedures shall be initiated and records of any corrective actions taken shall be maintained.² **(R 336.1201(3), 40 CFR 64.7(d))**
8. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64, compliance including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, 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.² **(R 336.1201(3), 40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
9. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment.² **(R 336.1201(3), 40 CFR 64.7(b))**
10. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions.² **(R 336.1201(3), 40 CFR 64.9(b)(1))**

VII. REPORTING

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

3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.² **(R 336.2001(3))**
6. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.² **(R 336.2001(4))**
7. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.² **(R 336.2001(5))**
8. The permittee shall submit monthly records of CO emissions with the semiannual reporting of monitoring and deviations.² **(R 336.1205(3))**
9. The permittee shall submit monthly records required in VI.2. of the amount of wood fuel burned with the semiannual reporting of monitoring and deviations.² **(R 336.1205(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVKONUS	60 inches ²	100 feet ²	R 336.1201(3), R 336.1205(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan (MAP) and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.² **(R 336.1301, R 336.1331, R 336.1910)**
2. The permittee shall comply with all requirements of 40 CFR Part 64. **(40 CFR Part 64)**
3. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or

the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

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

**EUGEKATOH
 EMISSION UNIT CONDITIONS**

DESCRIPTION:

One natural gas fired Geka thermal oil heater, rated at a maximum heat input of 40 million BTU per hour.

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. PM-10	0.30 pph ²	Hourly	EUGEKATOH	SC II.1	R 336.1205(3)
2. PM	0.30 pph ²	Hourly	EUGEKATOH	SC II.1	R 336.1205(3)
3. NOx	3.92 pph	Hourly	EUGEKATOH	SC II.1	R 336.1205(3)
4. CO	3.29 pph ²	Hourly	EUGEKATOH	SC II.1	R 336.1205(3)
5. VOC	0.22 pph ²	Hourly	EUGEKATOH	SC II.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

- The permittee shall burn only natural gas in the reactivated Geka thermal oil heater.² (R 336.1205(3))

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

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

NA

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVEUGEKATOH	40 inch ² diameter	60 feet ²	R 336.1205(3)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

**EUDRYERRC
 EMISSION UNIT CONDITIONS**

DESCRIPTION:

Dryer System consisting of a replacement triple pass dryer drum with heat provided by the existing 42 million BTU per hour wood fired McConnell burner and/or three independently operated Maxon natural gas burners (19.5 million Btu per hour each) and an exhaust gas recirculation system (as needed). The dryer capacity is 16.5 tons per hour of dried flakes. A portion of the press (EUPRESS) emissions are routed to the Dryer System.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet electrostatic precipitator (WESP) E-tube unit with two separately energized electrical sections operating in parallel and a regenerative thermal oxidizer (RTO). The wet ESP is an E-tube unit with two separately energized electrical sections operating in parallel. Both the WESP and RTO are CAM subject control devices.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM-10	0.020 gr / dscf ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
2. PM-10	7.9 pph ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
3. PM	0.020 gr / dscf ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
4. PM	7.9 pph ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
5. SO ₂	0.4 pph ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
6. NO _x	14.8 pph ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
7. CO	23.98 pph ²	Hourly	EUDRYERRC	SC V.1	R 336.1205(3)
8. CO	78.34 tpy ²	12-month rolling time period as determined at the end of each calendar month **	EUDRYERRC	SC VI.1	R 336.1205(3)
9. VOC	5.12 pph ^{***2}	Hourly	EUDRYERRC	SC V.1	R 336.1205(3) R 336.1702(c)
10. VOC	14.07 tpy ²	12-month rolling time period as determined at the end of each calendar month **	EUDRYERRC	SC VI.1	R 336.1205(3) R 336.1702(c)
11. Acetaldehyde	1.17 pph ¹	Hourly	EUDRYERRC	SC V.1	R 336.1225
12. Acrolein	0.195 pph ¹	Hourly	EUDRYERRC	SC V.1	R 336.1225
13. Formaldehyde	1.11 pph ¹	Hourly	EUDRYERRC	SC V.1	R 336.1225
14. Manganese	0.03 pph ¹	Hourly	EUDRYERRC	SC V.1	R 336.1225
*If the tested emission factor for EUDRYERRC is lower than the emission limit for CO and/or VOC in this section, the tested emission factor may be used to determine compliance with the tons per year limit.					
**The VOC limit is based on a maximum drying rate of 16.50 oven dry tons (ODT)/hour.					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coniferous Wood	30% by volume ²	12-month rolling time period as determined at the end of each calendar month	EUDRYERRC	SC VI.13	R 336.1205(3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUDRYERRC unless the cyclone, the wet electrostatic precipitator, and the RTO are installed, maintained and operated in a satisfactory manner. ² **(R 336.1370, R 336.1910)**
2. The permittee shall not operate EUDRYERRC unless the hourly average minimum combustion temperature in the RTO is greater than 1525 degrees Fahrenheit or the minimum hourly average combustion temperature identified during the most recent acceptable compliance test. ² **(R 336.1910)**
3. The permittee shall not introduce wash liquor from the wet electrostatic precipitator to EUDRYERRC. ² **(R 336.1910)**
4. The permittee shall keep a record of the date and time that each RTO bake out is initiated and the length of each bake out. ² **(R 336.1201(3))**
5. The permittee shall not operate EUDRYERRC unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained. ² **(R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of EUDRYERRC resumes regular operation after the project, the permittee shall verify PM10, PM, CO, NOx, VOC, Acetaldehyde, Acrolein, Formaldehyde, and Manganese emission rates without exhaust gas recirculation operation from EUDRYERRC by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol.

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
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A

No less than 30 days prior to testing, the permittee shall submit a complete test protocol to the AQD Technical Programs Unit and District Office. The AQD must approve the final protocol 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.² (R 336.1205(3), R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804)

2. The permittee shall conduct daily visible emissions observations from EUDRYERRC using EPA Method 22 or an alternate test method approved by the AQD. The AQD District Supervisor must approve an alternate test method prior to testing.² (R 336.2001, R 336.2003, R 336.2004)
3. The permittee shall verify the PM₁₀, PM, CO, NO_x, VOC, Acetaldehyde, Acrolein, Formaldehyde, and Manganese emission rates from EUDRYERRC, at a minimum, every five years from the date of the last test. (R 336.1213(3), 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 336.1213(3)(b)(ii))

1. The permittee shall keep a monthly record of the amount of CO and VOC emitted from EUDRYERRC, calculated using the hourly average emission rate per an acceptable method as approved by the District Supervisor from the most recent available compliance testing. By the tenth day of each calendar month, the permittee shall calculate the CO and VOC emission for the previous 12-calendar month period. The permittee shall submit CO and VOC emission records with the semi-annual reports.² (R 336.1205(3), R 336.1702(a))
2. The permittee shall monitor the RTO combustion chamber temperature at the middle of the combustion chamber using a thermocouple and shall record the combustion chamber temperature on a continuous basis. The permittee shall submit the RTO hourly average combustion temperature summary records with the semi-annual reports. The thermocouple shall be calibrated as needed.² (R 336.1201(3), 40 CFR 64.6(c)(1)(i), (ii) and (iii), 40 CFR 64.7, 40 CFR 64.9)
3. An hourly average minimum RTO combustion temperature less than 1525 degrees Fahrenheit (or the minimum hourly average combustion temperature identified during the most recent acceptable compliance test) is an excursion. In the event of an excursion the permittee shall initiate the AQD approved malfunction abatement plan corrective procedures and restore operation of the RTO to normal or usual manner of operation as quickly as practicable in accordance with good air pollution control practice for minimizing emissions.² (R 336.1201(3), 40 CFR 64.6(c)(2), 40 CFR 64.7(d))
4. The permittee shall maintain a summary record of RTO temperature monitoring system downtime. The permittee shall keep a summary record of all hourly average minimum RTO combustion temperatures less than 1525 degrees Fahrenheit (or the minimum hourly average combustion temperature identified during the most recent acceptable compliance test). The summary shall include the cause if known and details of corrective action or action taken to discontinue operation of EUDRYERRC as required by SC III.2.² (R 336.1201(3), 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)
5. The permittee shall monitor on an hourly basis the temperature in the wet electrostatic precipitator (ESP) measured at the outlet of the quench section using a thermocouple and shall record the temperature on a continuous basis. The thermocouple shall be calibrated as needed.² (R 336.1201(3), (40 CFR 64.6(c)(1)(i), (ii), and (iii))
6. The permittee shall continuously monitor and record hourly the temperature at the outlet of the quench section using a thermocouple as an indicator of proper operation of the ESP. The indicator range is an hourly average quench section temperature less than 180 degrees Fahrenheit.² (R 336.1201(3), 40 CFR 64.6(c)(1)(i and ii))

7. An hourly average quench section temperature greater than 180 degrees Fahrenheit is an excursion. In the event of an excursion the permittee shall initiate the AQD approved malfunction abatement plan corrective procedures and restore operation of the EUDRYERRC process equipment and associated air pollution control equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions.² **(R 336.1201(3), 40 CFR 64.6(c)(2), 40 CFR 64.7(d))**
8. The permittee shall maintain a summary record of the wet ESP temperature monitoring system downtime. The permittee shall keep a summary record of all hourly quench section temperatures greater than 180 degrees Fahrenheit including keeping a summary record of corrective action taken. The permittee shall submit the quench temperature monitor downtime summary records with the semi-annual reports.² **(R 336.1201(3), R 336.1910, 40 CFR Part 64, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**
9. The permittee shall monitor and record on an hourly basis the secondary voltage for each of the two parallel sections of the wet ESP.² **(R 336.1201(3), 40 CFR 64.6(c)(1)(i))**
10. An hourly precipitator grid voltage less than 30 kilovolts (not caused by automated hourly flushing action) is an excursion. In the event of an excursion the permittee shall initiate the AQD approved malfunction abatement plan corrective procedures and restore operation of the EUDRYERRC process equipment and associated air pollution control equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions. The permittee shall submit hourly precipitator grid voltage summary records with the semi-annual reports.² **(R 336.1201(3), R 336.1910, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**
11. Precipitator grid voltages below 30 kilovolts caused by a malfunction shall be recorded. The permittee shall keep a summary record of all hourly precipitator grid voltages less than 30 kilovolts (excursions) that are not caused by automated hourly flushing action including a summary record of corrective action taken and voltage monitoring system downtime.² **(R 336.1201(3), R 336.1910, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**
12. The permittee shall keep a monthly record of the amount of finished product produced. By the tenth day of each calendar month, the permittee shall calculate the amount of finished product produced for the previous 12-calendar month period.² **(R 336.1205(3))**
13. The permittee shall keep a monthly record of the amount of coniferous and non-coniferous wood used to manufacture the finished product. By the tenth day of each calendar month, the permittee shall calculate the percentage by volume of coniferous wood used to manufacture the finished product for the previous 12-calendar month period. The permittee shall submit monthly records of the amount of coniferous and non-coniferous wood used with the semi-annual reports.² **(R 336.1205(3))**
14. The permittee shall keep a record of the date and time that each RTO bake out is initiated and the length of each bake out.² **(R 336.1201(3))**
15. The permittee shall, at all times, maintain the RTO and Wet ESP monitoring system, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.² **(R 336.1201(3), 40 CFR 64.7(b))**
16. The permittee shall conduct temperature and voltage readings at all required intervals that the equipment is operating except for defined malfunctions, repairs and QA/QC activities.² **(R 336.1201(3), 40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
17. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices.² **(R 336.1301, R 336.1331, R 336.1910)**
18. The permittee shall submit records of the amount of finished product produced with the semi-annual reports.² **(R 336.1201(3))**

19. The permittee shall record a daily visual opacity observation as an indicator of proper operation of the dust collector. The indicator is the presence of visible emissions.² **(R 336.1201(3))**
20. An excursion is a departure from the indicator range of no visible emissions. The indicator of no visible emissions indicates normal operations.² **(R 336.1201(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A.² **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30.² **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year.² **(R 336.1213(4)(c))**
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.² **(R 336.2001(3))**
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.² **(R 336.2001(4))**
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.² **(R 336.2001(5))**
7. Each semi-annual report of monitoring and deviations submitted pursuant to VII.2 shall include:
(40 CFR 64.9)
 - a. Summary information on the number, duration, and cause (including unknown cause, if applicable) of exceedances and excursions, as defined in 40 CFR 64.1, and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances;
 - b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than for calibration checks). If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime;
 - c. A description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if applicable. If a QIP has been completed, the report shall include documentation that the plan has been implemented and reduced the likelihood of similar levels of excursions or exceedances occurring.
8. The permittee shall submit CO and VOC emission records with the semiannual reports.² **(R 336.1205(3), R 336.1702(a))**
9. The permittee shall submit the RTO hourly average combustion temperature summary records with the semiannual reports.² **(R 336.1201(3))**
10. The permittee shall submit the quench temperature monitor downtime summary records with the semiannual reports.² **(R 336.1201(3), R 336.1910)**

11. The permittee shall submit hourly precipitator grid voltage summary records with the semiannual reports.² **(R 336.1910)**
12. The permittee shall submit records of the amount of finished product produced with the semiannual reports.² **(R 336.1201(3), R 336.1205(3))**
13. The permittee shall submit monthly records of the amount of coniferous and non-coniferous wood used with the semiannual reports.² **(R 336.1205(3))**
14. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices.² **(R 336.1301, R 336.1331, R 336.1910)**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVRTOSTACK	64 inches ²	100 feet ²	R 336.1205(3), R 336.1225

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.² **(R 336.1301, R 336.1331, R 336.1910)**
1. The permittee shall comply with all requirements of 40 CFR Part 64. **(40 CFR Part 64)**
2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

EUPRESS EMISSION UNIT CONDITIONS

DESCRIPTION:

Press System including the Board Press and fugitive emissions from the mat forming line. The press has 17 flights with vented platens on all flights that route a portion of the Press System exhaust to the Dryer System for control. The vented platen press emissions are controlled by the Dryer System WESP and RTO and are accounted for in the emission limits under EUDRYERRC. The limits for EUPRESS are applicable to the portion of the exhaust that is not sent to the Dryer System.

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. PM-10	24.0 pph ²	Hourly	EUPRESS	SC V.1	R 336.1205(3)
2. PM-10	100.8 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC II.1 SC VI.1	R 336.1205(3)
3. PM	24.0 pph ²	Hourly	EUPRESS	SC V.1	R 336.1205(3)
4. PM	100.8 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC II.1 SC VI.1	R 336.1205(3)
5. NOx	1.36 pph ²	Hourly	EUPRESS	SC V.1	R 336.1205(3)
6. CO	4.64 pph ²	Hourly	EUPRESS	SC V.1	R 336.1205(3)
7. CO	15.5 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC II.1 SC VI.1	R 336.1205(3)
8. VOC	73.6 pph ²	Hourly	EUPRESS	SC V.1	R 336.1205(3) R 336.1702
9. VOC	159.0 tpy ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC VI.1	R 336.1205(3) R 336.1702
10. Formaldehyde	4.1 pph ¹	Hourly	EUPRESS	SC V.1	R 336.1225
11. Formaldehyde	19,800 lbs/yr ¹	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC VI.1	R 336.1225(2)
12. Methylene Diphenyl Isocyanate	0.53 pph ¹	Hourly	EUPRESS	SC V.1	R 336.1225
13. Phenol	2.0 pph ¹	Hourly	EUPRESS	SC V.1	R 336.1225

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Finished Product	109,686 tons of finished products per year. ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC VI.2	R 336.1205(3)
2. Coniferous Wood	30% by volume. ²	12-month rolling time period as determined at the end of each calendar month	EUPRESS	SC VI.3	R 336.1205(3)

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

1. Within 180 days after commencement of EUPRESS resumes regular operation after the project, the permittee shall verify PM10, PM, CO, NOx, VOC, Formaldehyde, Methylene Diphenyl Isocyanate, and Phenol emission rates without exhaust gas recirculation operation from EUPRESS by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in the table below. An alternate method, or a modification to the approved EPA Method, may be specified in an AQD approved Test Protocol.

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
NOx	40 CFR Part 60, Appendix A
CO	40 CFR Part 60, Appendix A
VOC	40 CFR Part 60, Appendix A
HAPs	40 CFR Part 63, Appendix A
Metals	40 CFR Part 60, Appendix A; 40 CFR Part 61, Appendix B; 40 CFR Part 63, Appendix A

No less than 30 days prior to testing, the permittee shall submit a complete test protocol to the AQD Technical Programs Unit and District Office. The AQD must approve the final protocol 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.² **(R 336.1205(3), R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2803, R 336.2804)**

2. The permittee shall verify the PM10, PM, CO, NOx, VOC, Formaldehyde, Methylene Diphenyl Isocyanate, and Phenol emission rates from EUPRESS, at a minimum, every five years from the date of the last test. **(R 336.1213(3), 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 336.1213(3)(b)(ii))**

1. The permittee shall keep a monthly record of the amount of PM, PM-10, NO_x, CO VOCs and Formaldehyde emitted from EUPRESS, calculated using the hourly average emission rate per an acceptable method as approved by the District Supervisor from the most recent available emissions testing. By the tenth day of each calendar month, the permittee shall calculate the volatile organic compound emission for the previous 12-calendar month period.² **(R 336.1205(3))**
2. The permittee shall keep a monthly record of the amount of finished product produced. By the tenth day of each calendar month, the permittee shall calculate the amount of finished product produced for the previous 12-calendar month period.² **(R 336.1205(3))**
3. The permittee shall keep a monthly record of the amount of coniferous and non-coniferous wood used to manufacture the finished product. By the tenth day of each calendar month, the permittee shall calculate the percentage by volume of coniferous wood and non-coniferous wood used to manufacture the finished product for the previous 12- calendar month period. The permittee shall submit records of the amount of coniferous and non-coniferous wood used with the semiannual reports.² **(R 336.1205(3))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.² **(R 336.2001(3))**
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date.² **(R 336.2001(4))**
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.² **(R 336.2001(5))**
7. The permittee shall submit monthly emissions records with the semiannual reports.² **(R 336.1205(3))**
8. The permittee shall submit records of the amount of finished product produced with the semiannual reports.² **(R 336.1205(3))**
9. The permittee shall submit records of the amount of coniferous and non-coniferous wood used with the semiannual reports.² **(R 336.1201(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack or Vent ID	Maximum Exhaust Dimensions	Minimum Height Above Ground	Underlying Applicable Requirements
1. SVPRESSEAST	NA	75 feet ²	R 336.1205(3), R 336.1225
2. SVPRESSWEST	NA	75 feet ²	R 336.1205(3), R 336.1225

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

**EUCOATING
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of a paint booth with dry exhaust filters and a natural gas-fired drying oven for painting grooved areas on siding, and an edge seal paint booth with dry exhaust filters.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Dry exhaust filters.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Visible Emissions	No visible emissions except due to uncombined water vapor ²	Instantaneous	EUCOATING	SC III.1	R 336.1301(1)(c)
2. VOCs	1.1 pph ²	Hourly	EUCOATING	SC VI.3	R 336.1702

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUCOATING unless all exhaust filters are in place and operating properly.² (R 336.1910)
2. The permittee shall not operate EUCOATING unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall maintain a record of the VOC content of each material used in EUCOATING. ²
(R 336.1213(3), R 336.1702)
2. The permittee shall maintain a monthly record of the usage rate of each material used in EUCOATING. ²
(R 336.1213(3), R 336.1702)
3. The permittee shall maintain a monthly record of calculations determining the monthly average VOC emission rate in pounds per hour. **(R 336.1213(3), R 336.1702)**
4. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **(R 336.1331, R 336.205(3))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval. ²
(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)

Footnotes:

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

**EUBAGHOUSE1
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group exhausts controlled by the Carter-Day Baghouse1 which can include; the Diamond roll screener, Baghouse1 outfeed, and collected fines from Baghouse5.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse1. This is a CAM-subject control device.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE1	SC VI.1	R 336.1301(1)(c)
2. PM10	0.032 lb per 1000 lbs of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE1	SC VI.1	R 336.1205(3)
3. PM-10	5.8 pph ²	Hourly	EUBAGHOUSE1	SC VI.1	R 336.1205(3)
4. PM	0.032 lb per 1000 lbs of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE1	SC VI.1	R 336.1205(3) R 336.1331
5. PM	5.8 pph ²	Hourly	EUBAGHOUSE1	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE1 process group equipment unless Baghouse1 is installed, maintained and operated in a satisfactory manner.² (R 336.1370, R 336.1910)
2. The permittee shall not operate EUBAGHOUSE1 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **(R 336.1331, R 336.205(3))**
2. The permittee shall perform and record the results of a daily visible emission check using US EPA Method 22 based procedures during routine maximum operating conditions. If any visible emissions (excursion) are observed the AQD approved malfunction abatement plan corrective procedures shall be initiated, and records of any corrective actions taken shall be maintained. **(40 CFR 64.6(c)(2), 40 CFR 64.7(d), 40 CFR 64.6(c)(1)(i), (ii), and (iii))**
3. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
4. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
5. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

VII. REPORTING

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

- Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9 (a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE1	42 inches ²	60 feet ²	R 336.1901

IX. OTHER REQUIREMENT(S)

- The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval. ² **(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall comply with all applicable requirements of 40 CFR, Part 64. **(40 CFR, Part 64)**
- If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

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

**EUBAGHOUSE2
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of exhausts from the mat forming line, including the flake resin application operation, the flying cutoff saw, and the flake reclaim system. The flake reclaim system includes the flake formers, flake conveyors and mad side suction.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse2. This is a CAM-subject control device.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE2	SC VI.1	R 336.1301(1)(c)
2. PM-10	0.031 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE2	SC VI.1	R 336.1205(3)
3. PM-10	3.8 pph ²	Hourly	EUBAGHOUSE 2	SC VI.1	R 336.1205(3)
4. PM	0.031 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE 2	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	3.8 pph ²	Hourly	EUBAGHOUSE 2	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate the EUBAGHOUSE2 process group equipment unless Baghouse2 is installed, maintained, and operated in a satisfactory manner.² (R 336.1370, R 336.1910)
- The permittee shall not operate EUBAGHOUSE2 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **(R 336.1331, R 336.205(3))**
2. The permittee shall perform and record the results of a daily visible emission check using US EPA Method 22 based procedures during routine maximum operating conditions. If any visible emissions (excursion) are observed the AQD approved malfunction abatement plan corrective procedures shall be initiated and records of any corrective actions taken shall be maintained. **(40 CFR 64.6(c)(2), 40 CFR 64.7(d), 40 CFR 64.6(c)(1)(i), (ii), and (iii))**
3. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
4. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
5. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

VII. REPORTING

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

- Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9 (a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE2	36 inches ²	35 feet ²	R 336.1901, R 336.1205(3)

IX. OTHER REQUIREMENT(S)

- The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.² **(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall comply with all applicable requirements of 40 CFR, Part 64. **(40 CFR, Part 64)**
- If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

**EUBAGHOUSE3
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of thermal oil heater fuel metering bin and the waferizer green fines blower.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse3. This is a CAM-subject control device.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Monitoring / Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE3	SC VI.1	R 336.1301(1)(c)
2. PM-10	0.021 lb per 1000 lbs of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE3	SC VI.1	R 336.1205(3)
3. PM-10	1.9 pph ²	Hourly	EUBAGHOUSE3	SC VI.1	R 336.1205(3)
4. PM	0.021 lb per 1000 lbs of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE3	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	1.9 pph ²	Hourly	EUBAGHOUSE3	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE3 process group equipment unless Cyclone Collector #3 and Baghouse3 are installed, maintained, and operated in a satisfactory manner.² (**R 336.1370, R 336.1910**)
2. The permittee shall not operate EUBAGHOUSE3 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (**R 336.1910, R 336.1911**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall keep records of the Inspection and Maintenance Program including records of problems found, repairs done, and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices. **(R 336.1331, R 336.205(3))**
2. The permittee shall perform and record the results of a daily visible emission check using US EPA Method 22 based procedures during routine maximum operating conditions. If any visible emissions (excursion) are observed the AQD approved malfunction abatement plan corrective procedures shall be initiated, and records of any corrective actions taken shall be maintained. **(40 CFR 64.6(c)(2), 40 CFR 64.7(d), 40 CFR 64.6(c)(1)(i), (ii), and (iii))**
3. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.7(d))**
4. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**
5. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

VII. REPORTING

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

- Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9 (a)(2)(i))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE3	33 inches x 52 inches ²	60 feet ²	R 336.1901 R 336.1205(3)

IX. OTHER REQUIREMENT(S)

- The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.² **(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)**
- The permittee shall comply with all applicable requirements of 40 CFR, Part 64. **(40 CFR, Part 64)**
- If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:

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

**EUBAGHOUSE5
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of exhausts from the two dry flake day bins, conveyors and screener all controlled by Carter Day Baghouse5.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse5.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE5	SC VI.1	R 336.1301(1)(c)
2. PM-10	0.01 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE5	SC VI.1	R 336.1205(3)
3. PM-10	0.90 pph ²	Hourly	EUBAGHOUSE5	SC VI.1	R 336.1205(3)
4. PM	0.01 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE5	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	0.90 pph ²	Hourly	EUBAGHOUSE5	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE5 process group equipment unless Baghouse5 is installed, maintained, and operated in a satisfactory manner.² (R 336.1370, R 336.1910)
2. The permittee shall not operate EUBAGHOUSE5 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall visually inspect and record observations of visible emissions from the EUBAGHOUSE5 process and dust collection equipment on a daily basis. If visible emissions are observed, the permittee shall promptly determine whether corrective action is needed. If corrective action is needed, the permittee shall restore operation of the EUBAGHOUSE5 process equipment and associated dust collection equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions, including keeping a record of corrective action taken.² (R 336.1370, R 336.1910)

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE5	29 inches ²	17.5 feet ²	R 336.1205(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.² (R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)

Footnotes:

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

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

**EUBAGHOUSE6
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process consisting of exhausts from the dryer burner fuel bin. Wood fines discharged from Baghouse1 pass thru a hammer mill then are blown to dryer burner fuel storage bin.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Flex-Kleen Baghouse6.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE6	SC VI.1	R 336.1301(1)(c)
2. PM-10	0.01 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE6	SC VI.1	R 336.1205(3)
3. PM-10	0.14 pph ²	Hourly	EUBAGHOUSE6	SC VI.1	R 336.1205(3)
4. PM	0.01 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE6	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	0.14 pph ²	Hourly	EUBAGHOUSE6	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE6 process equipment including the Hammermill fines blower unless Baghouse6 is installed, maintained, and operated in a satisfactory manner. ² (**R 336.1370, R 336.1910**)
2. The permittee shall not operate EUBAGHOUSE6 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained. ² (**R 336.1910, R 336.1911**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall visually inspect and record observations of visible emissions from the EUBAGHOUSE6 process and dust collection equipment on a daily basis. If visible emissions are observed, the permittee shall promptly determine whether corrective action is needed. If corrective action is needed, the permittee shall restore operation of the EUBAGHOUSE6 process equipment and associated dust collection equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions, including keeping a record of corrective action taken. ² **(R 336.1370, R 336.1910)**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE6	10 inches diameter	30 feet ²	R 336.1205(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.²
(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)

Footnotes:

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

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

**EUBAGHOUSE8
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of exhausts from the groover booth and hammermill, which includes the 1st and 2nd pass trim saws and 1st pass clean-up conveyor.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse8.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE8	SC VI.1	R 336.1301(1)(c)
2. PM	0.015 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE8	SC VI.1	R 336.1205(3)
3. PM-10	1.37 pph ²	Hourly	EUBAGHOUSE8	SC VI.1	R 336.1205(3)
4. PM	0.015 lb. per 1,000 lbs. of exhaust gas calculated on a dry gas basis ²	Hourly	EUBAGHOUSE8	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	1.37 pph ²	Hourly	EUBAGHOUSE8	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE8 process group equipment unless Baghouse8 is installed, maintained, and operated in a satisfactory manner. ² (R 336.1370, R 336.1910)
2. The permittee shall not operate EUBAGHOUSE8 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained. ² (R 336.1910, R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall visually inspect and record observations of visible emissions from the EUBAGHOUSE8 process and dust collection equipment on a daily basis. If visible emissions are observed, the permittee shall promptly determine whether corrective action is needed. If corrective action is needed, the permittee shall restore operation of the EUBAGHOUSE8 process equipment and associated dust collection equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions, including keeping a record of corrective action taken. ² **(R 336.1370, R 336.1910)**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE8	46 inch ²	38.8 feet ²	R 336.1205(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval. ² **(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)**

Footnotes:

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

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

**EUBAGHOUSE9
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Process group consisting of exhausts from the fines recovery system, which includes a metering bin.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Carter-Day Baghouse9.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	10% opacity, except due to uncombined water vapor ²	Six-Minute Average	EUBAGHOUSE9	SC VI.1	R 336.1301(1)(c)
2. PM-10	0.025 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE9	SC VI.1	R 336.1205(3)
3. PM-10	1.37 pph ²	Hourly	EUBAGHOUSE9	SC VI.1	R 336.1205(3)
4. PM	0.025 lb. per 1,000 lbs. of exhaust gases calculated on a dry gas basis ²	Hourly	EUBAGHOUSE9	SC VI.1	R 336.1331 R 336.1205(3)
5. PM	1.37 pph ²	Hourly	EUBAGHOUSE9	SC VI.1	R 336.1205(3)

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the EUBAGHOUSE9 process group equipment unless Baghouse9 is installed, maintained, and operated in a satisfactory manner.² **(R 336.1370, R 336.1910)**
2. The permittee shall not operate EUBAGHOUSE9 unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained.² **(R 336.1910, R 336.1911)**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. The permittee shall visually inspect and record observations of visible emissions from the EUBAGHOUSE9 process and dust collection equipment on a daily basis. If visible emissions are observed, the permittee shall promptly determine whether corrective action is needed. If corrective action is needed, the permittee shall restore operation of the EUBAGHOUSE9 process equipment and associated dust collection equipment to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions, including keeping a record of corrective action taken.²
(R 336.1370, R 336.1910)

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBAGHOUSE9	24 inch ²	48 feet ²	R 336.1205(3)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement a “Malfunction Abatement Plan and Control Equipment Monitoring Plan” that has been approved by the AQD District Supervisor. The plan shall include procedures for maintaining and operating in a satisfactory manner the process and add-on air pollution control device, or monitoring equipment during malfunction events, and a program for corrective action for such events. If the Malfunction Abatement Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the Malfunction Abatement Plan within 45 days after such an event occurs and submit the revised plan to the AQD District Supervisor for approval.²
(R 336.1213(2), R 336.1213(3), R 336.1301, R 336.1331, R 336.1910)

Footnotes:

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

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

D. FLEXIBLE GROUP CONDITIONS

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

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

FLEXIBLE GROUP SUMMARY TABLE

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

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGCOLDCLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EUCLEANERS
FGCIRICEMACT	Compression ignition, diesel fired back-up generator for the emergency fire water pump rated at 130 brake horsepower.	EUFIREPUMP
FGSIRICEMACT	One spark ignition, gasoline fired back-up generator. The emergency dryer back-up generator rated at 20 horsepower.	EUDRYBACKUP
FGCIRICEMACTNEW	Compression ignition, diesel fired back-up generator for Konus rated at 22 horsepower.	EUTHODIESEL

**FGCOLDCLEANERS
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCLEANERS

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. **(R 336.1213(2))**

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. **(R 336.1611(2)(b), R 336.1707(3)(b))**
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. **(R 336.1213(3))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. **(R 336.1281(h))**
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. **(R 336.1285(r)(iv))**
2. The cold cleaner shall be equipped with a device for draining cleaned parts. **(R 336.1611(2)(b), R 336.1707(3)(b))**
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. **(R 336.1611(2)(a), R 336.1707(3)(a))**

4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. **(R 336.1707(3)(a))**
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. **(R 336.1707(2)(a))**
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. **(R 336.1707(2)(b))**
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

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

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

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

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

**FGCIRICEMACT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, existing emergency, combustion ignition RICE less than 500 brake hp, which commenced construction or reconstruction before June 12, 2006.

Emission Unit: EUFIREPUMP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each CI engine shall be installed, maintained, and operated in a satisfactory manner. A list of management practice requirements as specified in 40 CFR 63.6603 and Table 2d, Item 4 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the work practices specified in 40 CFR Part 63, Subpart ZZZZ, Table 2d:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

2. If the CI engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law or which the risk was deemed unacceptable. **(40 CFR 63.6603, 40 CFR Part 63, Subpart ZZZZ, Table 2d, Item 4)**

3. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 63.6625(i). **(40 CFR 63.6625(i))**

4. Each CI engine shall be maintained and operated per the manufacturer's emission related written instructions or the permittee shall develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6 Item 9)**
5. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each CI engine to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
6. The permittee shall not allow the CI engine/s to exceed 100 hours for maintenance checks and readiness testing. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. **(40 CFR 63.6640(f)(1)(ii))**
7. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(1)(iii) of this section. **(40 CFR 63.6640(f)(1)(iii))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip the engine with and maintain a non-resettable hour meter to track the number of hours each CI engine operates. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

1. If using an oil analysis program for CI engine/s analysis of Total Base Number, Viscosity, and percent water is required. **(40 CFR 63.6625(i))**

VI. MONITORING/RECORDKEEPING

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

1. For each CI engine the permittee shall keep, in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**
2. For each CI engine the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**
3. For each CI engine the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.3. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**
4. For each CI engine the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**

- For each CI engine the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date of May 3, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

**FGSIRICEMACT
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, existing emergency, spark ignition RICE less than 500 brake hp, which commenced construction or reconstruction **before June 12, 2006**.

Emission Unit: EUDRYBACKUP

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

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

II. MATERIAL LIMIT(S)

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

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each SI engine shall be installed, maintained, and operated in a satisfactory manner. A list of recommended work practice standards is specified in 40 CFR 63.6603 and Table 2d, Item 5 or the permittee may petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices. The following are the work practices specified in 40 CFR Part 63, Subpart ZZZZ, Table 2d:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

2. If the SI engine is being operated during an emergency and it is not possible to shut down the engine to perform the work practice standards on the schedule required, the work practice standard can be delayed until the emergency is over. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State or local law has been abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law for which the risk was deemed unacceptable. **(40 CFR 63.6603, 40 CFR Part 63, Subpart ZZZZ, Table 2d, Item 5)**

3. The permittee shall operate each SI engine in compliance with the emission limitations and operating limitations in this Subpart. Each SI engine must be operated and maintained at any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. **(40 CFR 63.6605)**

4. Each SI engine shall be maintained and operated per the manufacturer's emission related written instructions or develop a maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. **(40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6 Item 9)**
5. The permittee shall minimize the time spent at idle during startup and minimize the startup time of each SI engine to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. **(40 CFR 63.6625(h))**
6. You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). **(40 CFR 63.6640(f)(2))**
7. Emergency stationary RICE may be operated for 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 owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. **(40 CFR 63.6640(f)(2)(ii))**
8. Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. **(40 CFR 63.6640(f)(2))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip the engine with and maintain a non-resettable hour meter to track the number of hours each SI engine operates. **(40 CFR 63.6625(f))**

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

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

1. For each SI engine the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation for the air pollution control and monitoring equipment. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(2), 40 CFR 63.6660)**
2. For each SI engine the permittee shall keep in a satisfactory manner, records of actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(a)(5), 40 CFR 63.6660)**
3. For each SI engine the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with operating limitations in SC III.1 and SC III.2. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(d), 40 CFR 63.6660)**

4. For each SI engine the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate the engine and after-treatment control device (if any) were operated and maintained according to the developed maintenance plan. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(e), 40 CFR 63.6660)**
5. For each SI engine the permittee shall keep in a satisfactory manner, records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation and how many hours were spent during non-emergency operation. If the engines were used for demand response operation, the permittee shall keep records of the notification of the emergency situation and the time the engine was operated as part of demand response. The permittee shall keep all records on file and make them available to the department upon request. **(40 CFR 63.6655(f), 40 CFR 63.6660)**

VII. REPORTING

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

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

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

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

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Spark Ignition Engines by the initial compliance date of October 19, 2013. **(40 CFR 63.6595(a)(1), 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

**FGRICEMACTNEW
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), located at an area source of HAP emissions, new RICE all sizes. An affected source that meets any of the criteria in paragraphs 40 CFR 63.6590(c)(1) through (7) of this section must meet the requirements of 40 CFR Part 63, Subpart ZZZZ by meeting the requirements of 40 CFR Part 60, Subpart IIII, for compression ignition engines or 40 CFR Part 60, Subpart JJJJ, for spark ignition engines.

Emission Unit ID: EUTOHDIESEL

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMITS

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

II. MATERIAL LIMITS

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

III. PROCESS/OPERATIONAL RESTRICTIONS

NA

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

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

NA

VI. MONITORING/RECORDKEEPING

NA

VII. REPORTING

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

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

See Appendix 8

VIII. STACK/VENT 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 Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENTS

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subparts A and ZZZZ, for Stationary Reciprocating Internal Combustion Engines by the initial compliance date. **(40 CFR 63.6595, 40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

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

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

E. NON-APPLICABLE REQUIREMENTS

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

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1. Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO ₂ e	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environment, Great Lakes and Energy	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
EGLE	Michigan Department of Environment, Great Lakes, and Energy	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

Appendix 2. Schedule of Compliance

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

Appendix 3. Monitoring Requirements

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

Appendix 4. Recordkeeping

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

Appendix 5. Testing Procedures

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

Appendix 6. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-N0780-2011. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-N0780-2011 is being reissued as Source-Wide PTI No. MI-PTI-N0780-2018

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
99-05B	NA	Modification of testing frequency requirements	EUKONUSTOH EUDRYERRC EUPRESS
99-05c	NA	Installation of a new trimline, consisting of two coating lines with drying ovens, and a saw and a board grinder both vented to Baghouse #10. In addition, increase HAP opt out limit to 9.9 tpy for individual HAP and 24.9 tpy for aggregate HAPs.	EUTRIMSAW&GRIND EUTRIMPAIN FGFACILITY

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP-N0780-2018.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
43-19	201900186 / March 19, 2020	<p>This Minor Modification was to incorporate PTI 43-19 into the ROP. PTI 43-19 allowed for the installation of three additional flights on EUPRESS and the addition of vented platens to all 17 flights. The description of EUPRESS was updated to describe the addition of the flights with vented platens and the platens will route approximately 30% of the exhaust to the dryer system (EUDRYERRC) to control emissions. Also, the Formaldehyde emission limit was increased from 3.1 pph to 4.1 pph, and the Material Limit for Finished Product was changed from 98,852 tons of finished product per year (tfp/yr) to 109,686 tfp/yr.</p> <p>Other changes include a clarification in the description of EUKONUSTOH to indicate only the thermal oil heaters are fired by wood fuel not the two economizers. The economizers do not combust any fuel. Also, the description of EUDRYERRC includes language identifying a portion of the press emissions will be routed to the dryer system and those emissions will be controlled by a WESP and RTO. The Formaldehyde emission limit in EUDRYERRC was increased from 0.67 pph to 1.11 pph.</p> <p>Additionally, the facility requested the removal of EUTRIMSAW&GRIND and EUTRIMPAINT from the ROP since these processes were never installed at the facility.</p>	EUKONUSTOH, EUDRYERRC, EUPRESS

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the EGLE, AQD, Report Certification form (EQP 5736) and EGLE, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section

of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

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