

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

LOUISIANA PACIFIC CORPORATION – NEWBERRY PLANT

State Registration Number (SRN): N0780

Located at

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

Permit Number: MI-ROP-N0780-2018a

Staff Report Date: January 25, 2016

Amended Date: January 31, 2020

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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Michigan Department of Environmental Quality
Air Quality Division

State Registration Number

N0780

RENEWABLE OPERATING PERMIT

JANUARY 25, 2016 - STAFF REPORT

ROP Number

MI-ROP-N0780-2018

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for Air Pollution Control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	Louisiana Pacific Corporation - Newberry Plant 7299 North County Road 403 Newberry, Michigan 49868
Source Registration Number (SRN):	N0780
North American Industry Classification System (NAICS) Code:	321219
Number of Stationary Source Sections:	1
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	201500098
Responsible Official:	Kurt Chamberlain, Plant Manager 906-293-4512
AQD Contact:	Joel Asher, Environmental Quality Analyst 906-250-5123
Date Application Received:	June 29, 2015
Date Application Was Administratively Complete:	July 1, 2015
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	January 25, 2016
Deadline for Public Comment:	February 24, 2016

Source Description

The Louisiana Pacific - Newberry Plant is located at 7299 North County Road 403, about one mile northeast of the Village of Newberry. The plant was constructed in 1984. The plant manufactures resin-bonded oriented strandboard and strandboard siding. Processes installed at the plant include log storage and debarking equipment, a log flaker, a flake dryer with wet electrostatic precipitator and regenerative thermal oxidizer, two 19.9 million BTU per hour wood-fired Korus thermal oil heaters with individual cyclone dust collectors followed by a fabric filter dust collector, one 40 million BTU per hour Geka thermal oil heater re-permitted in 2003 to burn natural gas only, a mat forming line and board press, paint spray operation, several fabric filter dust collectors serving various sawing and board grooving operations, and a Safety-Kleen cold cleaner

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year **2014**.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	89
Lead (Pb)	6.7 lbs.
Nitrogen Oxides (NO _x)	30
Particulate Matter (PM)	36
Sulfur Dioxide (SO ₂)	3
Volatile Organic Compounds (VOCs)	19

The following table lists Hazardous Air Pollutant emissions as calculated for the year 2014 by the facility:

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
NA	0
Total Hazardous Air Pollutants (HAPs)	0

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

The stationary source is located in Luce County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants. The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70, because the potential to emit CO, PM₁₀, NO_x, and VOC exceeds 100 tons per year.

The stationary source is considered to be a "synthetic minor" source in regards to HAP emissions because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112, to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

The stationary source is considered a "synthetic minor" source in regards to the Prevention of Significant Deterioration regulations of 40 CFR 52.21 because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of CO, PM10, NOx, and VOC to less than 250 tons per year.

On December 9, 2005, the ROP was modified to incorporate the requirements of Permit to Install 99-05A which included "synthetic minor" limits on Hazardous Air Pollutants. As a result, the stationary source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD.

FGSIRICEMACT, FGCIRICEMACT and FGRICEMACTNEW at the stationary source are subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE MACT). The ROP contains special conditions provided by Louisiana Pacific Corporation – Newberry Plant in their application for applicable requirements from 40 CFR Part 63, Subparts A and ZZZZ. The AQD is not delegated the regulatory authority for this area source MACT.

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

EUDRYERRC at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of PM\PM-10 greater than the major source threshold level. The monitoring for the control device is conducted by continuously monitoring the transformer voltage of the wet electrostatic precipitator (WESP). The indicator level of the WESP voltage was selected based upon the level maintained during normal operation which is typically above 30 kV.

EUDRYERRC also has a control device and potential pre-control emissions of VOCs greater than the major source threshold level. The monitoring for the control device is conducted by continuously monitoring the temperature of the regenerative thermal oxidizer (RTO). The indicator level of the RTO temperature was selected because it is indicative of good combustion and VOC destruction efficiency. The indicator range for the RTO temperature of greater than 1525 degrees F was selected based upon previous acceptable compliance tests.

EUBAGHOUSE1 at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of PM\PM-10 greater than the major source threshold level. The monitoring for the control device is conducted by performing daily visible emissions readings. Visible emissions readings were selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. The indicator of acceptable baghouse operation is no visible emissions as this indicates normal operations.

EUBAGHOUSE2 at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of PM\PM-10 greater than the major source threshold level. The monitoring for the control device is conducted by performing daily visible emissions readings. Visible emissions readings were selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. The indicator of acceptable baghouse operation is no visible emissions as this indicates normal operations.

EUBAGHOUSE3 at the stationary source is subject to the federal Compliance Assurance Monitoring rule under 40 CFR Part 64. This emission unit has a control device and potential pre-control emissions of PM\PM-10 greater than the major source threshold level. The monitoring for the control device is conducted by performing daily visible emissions readings. Visible emissions readings were selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. The indicator of acceptable baghouse operation is no visible emissions as this indicates normal operations.

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. MI-ROP-N0780-2011 are identified in Appendix 6 of the ROP.

PTI Number			
254-84G			
99-05A			

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP Application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	Rule 212(4) Exemption	Rule 201 Exemption
EUMDITANK1	Methylene Diphenyl Isocyanate Resin Storage Tank.	212(4)(c)	284(i)
EUMDITANK2	Formerly DVPFTANK repurposed for Methylene Diphenyl Isocyanate Resin Storage.	212(4)(c)	284(i)
EUWXTANK	Wax Storage Tank	212(4)(c)	284(i)
EUSPACEHEATER	Space Heater	212(4)(b)	282(b)(i)
EUUSED OIL FURNACE	Waste Oil-Fired Furnace in Blending Area for Space Heating	212(4)(b)	282(b)(iv)
EUSCALE FURNACE	Fuel Oil-Fired Furnace in Scalehouse	212(4)(b)	282(b)(ii)
EULPTANK1 EULPTANK2	LP Tank for Hi-Lo Fuel, 1000 Gallon Capacity each	212(4)(c)	284(b)
EULPTANK3	LP Tank, 1000 Gallon Capacity	212(4)(c)	284(b)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the MDEQ, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Dan W. Maki, Acting Upper Peninsula District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

N0780

MAY 23, 2016 - STAFF REPORT ADDENDUM

MI-ROP-N0780-2018

Purpose

A Staff Report dated January 25, 2016, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Kurt Chamberlain, Plant Manager, 906-293-4512
AQD Contact:	Joel Asher, Environmental Quality Analyst, 906-250-5123

Summary of Pertinent Comments

The EPA was the only party to submit pertinent comments during the 30-day public comment period.

Comments from the EPA included:

- Request for additional information regarding the synthetic minor status of the facility.
- Review the ROP to ensure additional terms originating from the permit to install were not omitted.
- Review CAM references to ensure they are from the most recently approved CAM template.
- Verify if emission units are included in a Malfunction Abatement Plan (MAP) and include in the ROP as appropriate.
- Verify all citations referring to a MAP include the plan is approved by the AQD District Supervisor and is implemented and maintained.
- Review and ensure consistent wording between emission unit requirements.
- Request for explanation of specific conditions in EUDRYERRC.
- Request for clarification of conditions in FGCIRICEMACT and FGSIRICEMACT.
- Justification of the indicator for CAM requirements for EUBAGHOUSE1, EUBAGHOUSE2, and EUBAGHOUSE3.
- Clarification of CAM applicability for EUBAGHOUSE5, EUBAGHOUSE6, EUBAGHOUSE8, and EUBAGHOUSE9.

The facility is considered a synthetic minor source for hazardous air pollutants (HAPS). It has voluntarily accepted the limits specified under the Source Wide Conditions section of the ROP. These limit the facility to less than 9 tons per year (tpy) of each individual HAP and less than 22.5 tpy of aggregate HAPS. EUPRESS is the emission unit of concern regarding HAPS. EUPRESS has a production limit of 90,500 tons of finished products per year. The facility is required to calculate the amount of finished products produced for the previous 12-calendar month period by the tenth day of each calendar month. HAP emission rates are calculated on a 12 month rolling time period at the end of each calendar month. These calculations are based on emission factors determined from emission stack testing done by the facility. Total facility production is multiplied by the emissions factor to determine total HAP emissions. Stack test protocols are monitored and evaluated by the AQD Technical Programs Unit to ensure emission factors are a true measure of the actual facility emissions. All emission activities are considered in the source-

wide limits. Monthly emission rate calculations conducted by the facility use the most recent stack test data to determine total HAP emissions.

EUDRYERRC, Section 1 * states, "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." This statement is intended to be used for compliance determination with limits specified within the ROP.

In the January 25, 2016, Staff Report, the following was included regarding the EUDRYERRC west electrostatic precipitator (WESP) and Compliance Assurance Monitoring (CAM) applicability, "The indicator level of the WESP voltage was selected based upon the level maintained during normal operation which is typically above 30 kV." This language may be potentially confusing. For clarification it should read, "The indicator level of the WESP voltage was selected based upon the level maintained during normal operation which is above 30 kV. A WESP voltage of less than 30 kV would indicate an excursion."

After receiving comments from the EPA a request was made of the facility to perform a thorough facility-wide CAM Applicability Determination. This was provided to the Department indicating changes to the facility's CAM Plan. A final determination was made indicating the facility has two emission units subject to CAM; EUDRYERRC and EUKONUSTOH. EUKONUSTOH was not previously identified as CAM subject. Appropriate changes to the ROP were made to reflect this change.

The baghouses previously cited as subject to CAM (EUBAGHOUSE1, EUBAGHOUSE2, and EUBAGHOUSE3), and the baghouses called into question via EPA's comments (EUBAGHOUSE5, EUBAGHOUSE6, EUBAGHOUSE8, and EUBAGHOUSE9) are all deemed not subject to CAM. These baghouses are used to recover material for recycle into the process or the fuel system. These baghouses are considered inherent process equipment as defined in 40 CFR 64.1 and are exempt from the CAM requirements.

The facility maintains a MAP for each of these emission units. The MAP will be posted with the Proposed ROP.

Changes to the January 25, 2016 Draft ROP

1. Cover page, change "Chris Hare, Acting Upper Peninsula District Supervisor" to "Dan W. Maki, Upper Peninsula District Supervisor."
2. EUKONUSTOH, DESCRIPTION, the following sentence was added, "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."
3. EUKONUSTOH, POLLUTION CONTROL EQUIPMENT, the following sentence was added, "This is a CAM subject control device."
4. EUKONUSTOH, SC VI.3 was changed to SC VI.7.
5. EUKONUSTOH, SC VI.4 was added to state, "The permittee shall record a daily non-certified visual opacity observation as an indicator of proper operation of the dust collector. The indicator is the presence of visible emissions. **(40 CFR 64.6(c)(1)(i and ii)).**"
6. EUKONUSTOH, SC VI.5 was added to state, "An excursion is a departure from the indicator range of no visible emissions. The indicator of no visible emissions indicates normal operations. **(40 CFR 64.6(c)(2)).**"

7. EUKONUSTOH, SC VI.6 was added to state, "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. **(40 CFR 64.7(d)).**"
8. EUKONUSTOH, SC VI.8 was added to state, "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. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c)).**"
9. EUKONUSTOH, SC VI.9 was added to state, "The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b)).**"
10. EUKONUSTOH, SC VII.4 was added to state, "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)).**"
11. EUKONUSTOH, SC VII.5 was added to state, "Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii)).**"
12. EUKONUSTOH, SC VII.6 to 9 numbering was adjusted accordingly.
13. EUKONUSTOH, SC IX.2 was added to state, "The permittee shall comply with all requirements of 40 CFR Part 64. **(40 CFR Part 64).**"
14. EUKONUSTOH, SC IX.3 was added to state, "If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e)).**"

15. EUDRYERRC, SC I, ** the word “capacity” was added.
16. EUDRYERRC, SC III.5 was added to state, “The permittee shall not operate EUDRYERRC unless the Malfunction Abatement Plan approved by the AQD District Supervisor is implemented and maintained. ² (R 336.1910, R 336.1911).”
17. EUDRYERRC, SC VI.1 the word “or” was changed to “per.”
18. EUDRYERRC, SC VI.2 the underlying applicability requirement (UAR) of “40 CFR 64.6(c)(1)” was removed.
19. EUDRYERRC, SC VI.3 was deleted and replaced with “The permittee shall continuously monitor the RTO combustion chamber temperature at the middle of the combustion chamber using a thermocouple and record continuously as an indicator of proper operation of the RTO. The indicator range is a minimum RTO combustion temperature of 1525 degrees Fahrenheit (or the minimum hourly average combustion temperature identified during the most recent acceptable compliance test). **(40 CFR 64.6(c)(1)(i and ii))**” to reflect the most recent CAM ROP template language.
20. EUDRYERRC, SC VI.4 was deleted and replaced with “The temperature monitor shall continuously monitor the RTO combustion temperature. The monitor thermocouple shall be calibrated or replaced as needed. **(40 CFR 64.6(c)(1)(iii))**” to reflect the most recent CAM ROP template language.
21. EUDRYERRC, SC VI.5 was added to state, “An excursion is a departure from the indicator range of minimum RTO combustion temperature of 1525 degrees Fahrenheit (or the minimum hourly average combustion temperature identified during the most recent acceptable compliance test). **(40 CFR 64.6(c)(2))**” to reflect the most recent CAM ROP template language.
22. EUDRYERRC, SC VI.6 was added to state,” 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). 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 **(R 336.1213(3), 40 CFR 64.7(d))**,” to reflect the most recent CAM ROP template language and includes language previously stated in SC VI.4 of the DRAFT ROP.
23. EUDRYERRC, SC VI.7 (which was SC VI.5 in the DRAFT ROP), the abbreviation “ESP” was added and the UAR of “40 CFR 64.6(c)(1)” was deleted.
24. EUDRYERRC, SC VI.8 was added to state, “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. **(40 CFR 64.6(c)(1)(i and ii))**,” to reflect the most recent CAM ROP template language.
25. EUDRYERRC, SC VI.9 was added to state, “The temperature monitor shall continuously monitor the ESP quench section outlet temperature. The monitor thermocouple shall be calibrated or replaced as needed. **(40 CFR 64.6(c)(1)(iii))**,” to reflect the most recent CAM ROP template language.

26. EUDRYERRC, SC VI.10 was added to state, "An excursion is a departure from the indicator range of a maximum ESP hourly average quench section temperature of 180 degrees Fahrenheit. **(40 CFR 64.6(c)(2))**," to reflect the most recent CAM ROP template language.
27. EUDRYERRC, SC VI.11 was added to state, "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). 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. **(R 336.1213(2), R 336.1213(3), R 336.1910, 40 CFR 64.7(d))**," to reflect the most recent CAM ROP template language.
28. EUDRYERRC, SC VI.12 is the new numbering for SC VI.8 of the DRAFT ROP.
29. EUDRYERRC, SC VI.6 of the DRAFT ROP has been deleted as this is now included in SC VI.5 and 6 to reflect the most recent CAM ROP template language.
30. EUDRYERRC, SC VI.7 of the DRAFT ROP has been deleted as this is now included in SC VI.11 to reflect the most recent CAM ROP template language.
31. EUDRYERRC, SC VI.13 was added to state, "The permittee shall continuously monitor and record hourly the secondary voltage for each of the two parallel sections as an indicator of proper operation of the ESP. The indicator range is an hourly average of greater than 30 kV. **(40 CFR 64.6(c)(1)(i and ii))**," to reflect the most recent CAM ROP template language.
32. EUDRYERRC, SC VI.14 was added to state, "The transformer voltage shall be continuously monitored for the secondary voltage for each of the two parallel sections. The averaging period is hourly. The transformer oil is tested for dielectric strength as needed. **(40 CFR 64.6(c)(1)(iii))**," to reflect the most recent CAM ROP template language.
33. EUDRYERRC, SC VI.15 was added to state, "An excursion is a departure from the indicator range of an hourly average of greater than 30 kV (not caused by automated hourly flushing action). **(40 CFR 64.6(c)(2))**," to reflect the most recent CAM ROP template language.
34. EUDRYERRC, SC VI.16 was added to state, "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). Precipitator grid voltages below 30 kV caused by a malfunction shall be recorded. The permittee shall keep a summary record of all hourly precipitator grid voltages less than 30 kV (excursions) that are not caused by automated hourly flushing action including a summary record of corrective action taken and voltage monitoring system downtime. **(R 336.1213(2), R 336.1213(3), R 336.1910, 40 CFR 64.6(c)(2), 40 CFR 64.7)**," to reflect the most recent CAM ROP template language.

35. EUDRYERRC, SC VI.9 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
36. EUDRYERRC, SC VI.10 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
37. EUDRYERRC, SC VI.11 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
38. EUDRYERRC, SC VI.12 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
39. EUDRYERRC, SC VI.13 of the DRAFT ROP has been renumbered to SC VI.17.
40. EUDRYERRC, SC VI.14 of the DRAFT ROP has been renumbered to SC VI.18.
41. EUDRYERRC, SC VI.15 of the DRAFT ROP has been renumbered to SC VI.19.
42. EUDRYERRC, SC VI.20 was added to state, "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, 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. **(40 CFR 64.6(c)(3), 64.7(c))**," to reflect the most recent CAM ROP template language.
43. EUDRYERRC, SC VI.21 was added to state, "The permittee shall properly maintain the RTO and ESP monitoring system, including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**," to reflect the most recent CAM ROP template language.
44. EUDRYERRC, SC VI.22 was added to state, "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))**," to reflect the most recent CAM ROP template language.
45. EUDRYERRC, SC VI.16 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
46. EUDRYERRC, SC VII.9 of the DRAFT ROP has been deleted to reflect the most recent CAM ROP template language.
47. EUDRYERRC, SC VII.10 of the DRAFT ROP has been renumbered to SC VII.9.
48. EUDRYERRC, SC VII.11 of the DRAFT ROP has been renumbered to SC VII.10.

49. EUDRYERRC, SC VII.12 of the DRAFT ROP has been renumbered to SC VII.11. The UARs of 40 CFR Part 64, 40 CFR 64.6(c)(2), 40 CFR 64.7, and 40 CFR 64.9 have been deleted to reflect the most recent CAM ROP template language.
50. EUDRYERRC, SC VII.13 of the DRAFT ROP has been renumbered to SC VII.12. The UARs of 40 CFR Part 64, 40 CFR 64.6(c)(2), 40 CFR 64.7, and 40 CFR 64.9 have been deleted to reflect the most recent CAM ROP template language.
51. EUDRYERRC, SC VII.14 of the DRAFT ROP has been renumbered to SC VII.13.
52. EUDRYERRC, SC VII.15 of the DRAFT ROP has been renumbered to SC VII.14.
53. EUDRYERRC, SC VII.16 of the DRAFT ROP has been renumbered to SC VII.15.
54. EUPRESS, SC VI.3, the words “and non-coniferous wood” have been added.
55. EUCOATING, SC III.2 was added to state, “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).**”
56. EUBAGHOUSE1, DESCRIPTION, the following sentence was deleted, “EUBAGHOUSE1 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.”
57. EUBAGHOUSE1, POLLUTION CONTROL EQUIPMENT, the following sentence was deleted, “This is a CAM subject control device.”
58. EUBAGHOUSE1, SC III.2 was added to state, “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).**”
59. EUBAGHOUSE1, SC VI.1 was deleted.
60. EUBAGHOUSE1, SC VI.2 was deleted.
61. EUBAGHOUSE1, SC VI.3 the citation “40 CFR 64.9(b)(1)” was deleted and renumbered to SC VI.1.
62. EUBAGHOUSE1, SC VI.4 was deleted.
63. EUBAGHOUSE1, SC VI.5 was deleted.
64. EUBAGHOUSE1, SC VII.4 was deleted.
65. EUBAGHOUSE1, SC VII.5 was deleted.
66. EUBAGHOUSE1, SC VII.6 was deleted.
67. EUBAGHOUSE1, SC VII.7 was renumbered to SC VII.4.
68. EUBAGHOUSE1, SC VII.8 was renumbered to SC VII.5.
69. EUBAGHOUSE1, SC IX.2 was deleted.
70. EUBAGHOUSE1, SC IX.3 was deleted.

71. EUBAGHOUSE2, DESCRIPTION, the following sentence was deleted, "EUBAGHOUSE2 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."
72. EUBAGHOUSE2, POLLUTION CONTROL EQUIPMENT, the following sentence was deleted, "This is a CAM subject control device."
73. EUBAGHOUSE2, SC III.2 was added to state, "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)."
74. EUBAGHOUSE2, SC VI.1 was deleted.
75. EUBAGHOUSE2, SC VI.2 was deleted.
76. EUBAGHOUSE2, SC VI.3 the citation "40 CFR 64.9(b)(1)" was deleted and renumbered to SC VI.1.
77. EUBAGHOUSE2, SC VI.4 was deleted.
78. EUBAGHOUSE2, SC VI.5 was deleted.
79. EUBAGHOUSE2, SC VII.4 was deleted.
80. EUBAGHOUSE2, SC VII.5 was deleted.
81. EUBAGHOUSE2, SC VII.6 was deleted.
82. EUBAGHOUSE2, SC VII.7 was renumbered to SC VII.4.
83. EUBAGHOUSE2, SC VII.8 was renumbered to SC VII.5.
84. EUBAGHOUSE2, SC IX.2 was deleted.
85. EUBAGHOUSE2, SC IX.3 was deleted.
86. EUBAGHOUSE3, DESCRIPTION, the following sentence was deleted, "EUBAGHOUSE3 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."
87. EUBAGHOUSE3, POLLUTION CONTROL EQUIPMENT, the following sentence was deleted, "This is a CAM subject control device."
88. EUBAGHOUSE3, SC III.2 was added to state, "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)."
89. EUBAGHOUSE3, SC VI.1 was deleted.
90. EUBAGHOUSE3, SC VI.2 was deleted.
91. EUBAGHOUSE3, SC VI.3 the citation "40 CFR 64.9(b)(1)" was deleted and renumbered to SC VI.1.
92. EUBAGHOUSE3, SC VI.4 was deleted.

93. EUBAGHOUSE3, SC VI.5 was deleted.
94. EUBAGHOUSE3, SC VII.4 was deleted.
95. EUBAGHOUSE3, SC VII.5 was deleted.
96. EUBAGHOUSE3, SC VII.6 was deleted.
97. EUBAGHOUSE3, SC VII.7 was renumbered to SC VII.4.
98. EUBAGHOUSE3, SC VII.8 was renumbered to SC VII.5.
99. EUBAGHOUSE3, SC IX.2 was deleted.
100. EUBAGHOUSE3, SC IX.3 was deleted.
101. EUBAGHOUSE5, SC III.2 was added to state, "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)."
102. EUBAGHOUSE6, SC III.2 was added to state, "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)."
103. EUBAGHOUSE8, SC III.2 was added to state, "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)."
104. EUBAGHOUSE9, SC III.2 was added to state, "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)."
105. FGCIRICEMACT, DESCRIPTION, the source was erroneously listed as a major source of HAPS. The words "a major" were changed to "an area." The statement "Compliance date is May 3, 2013" was deleted as this date has passed.
106. FGCIRICEMACT, SC III.1, the references to 'Table 2c, Item 1' were changed to "Table 2d, Item 4", the words "recommended work practice standards is specified in 40 CFR 63.6602" was deleted, and replaced with "management practice requirements as specified in 40 CFR 63.6603," and the word "recommended" was deleted from the second sentence. The UAR citation was changed from "40 CFR 63.6602" to "40 CFR 63.6603."
107. FGCIRICEMACT, SC III.2 was changed to read, "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))."
108. FGCIRICEMACT, SC III.5 was changed to read, "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))."

- 109.FGCIRICEMACT, SC III.6 was deleted.
- 110.FGCIRICEMACT, SC III.7 was changed to FGCIRICEMACT, SC III.6 and the UAR was updated to show 40 CFR 63.6640(f)(1)(iii)).
- 111.FGCIRICEMACT, SC V.1 was added.
- 112.FGCIRICEMACT, SC VI.3 the reference to “SC III.1 and SC III.2” was changed to “SC III.3.”
- 113.FGSIRICEMACT, DESCRIPTION, the source was erroneously listed as a major source of HAPS. The words “a major” were changed to “an area.” The statement “Compliance date is October 19, 2013” was deleted as this date has passed.
- 114.FGSIRICEMACT, SC III.1, the references to ‘40 CFR 63.6602 Table 2c, Item 6’ were changed to “40 CFR 63.6603 Table 2d, Item 5”, and the word, “recommended” was deleted. The UAR citation was changed from “40 CFR 63.6602” to “40 CFR 63.6603” and from “Item 6” to “Item 5.”

State Registration Number
N0780

RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-N0780-2018

**FEBRUARY 14, 2018 - STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated January 25, 2016, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to further address significant comments received on the draft ROP during the 45-day EPA comment period as described in R 336.1214(3) as well as to summarize the inclusion of PTI# 99-05C. In addition, this addendum describes any changes to the proposed ROP resulting from these pertinent comments.

General Information

Responsible Official:	Kurt Chamberlain, Plant Manager, 906-293-4512
AQD Contact:	Joseph Scanlan, EQA 906-458-6405

Summary of Pertinent Comments

Several comments were received from EPA during the comment period. Comments from EPA were received on July 6, 2016, and are as follows:

- It is unclear how the “blanket” source-wide HAP emissions limits relate to practically enforceable production and operation limits on individual emission units;
- The permit does not specify how emissions shall be determined, measured, or calculated for assessing compliance with the source-wide limits;
- It is unclear whether all emissions from all units are considered in determining compliance with the source-wide limits, including insignificant units;
- It is unclear whether the production limit for EUPRESS is being relied on to limit source-wide emissions;
- There is no information in the record regarding how the source’s potential to emit was determined, whether any units rely on the control equipment, whether any units other than EUPRESS rely on production/operation limits, how emissions variability and uncertainty is accounted for, etc.; and
- It appears that compliance with the source-wide limits may be at least partly based on emission factors instead of methods that are enforceable as a practical matter for the purpose of limiting potential to emit.

With the addition of updated language inserted into proposed renewal MI-ROP-N0787-XXXX from PTI# 99-05C, as well as deletion of redundant or excessively verbose special conditions and corrected citations, staff believes the concerns referenced above by EPA have been adequately addressed.

New emission units incorporated into the ROP from PTI# 99-05C consist of a new trim board production line that utilizes a saw for cutting the panels into trim boards, a paint line that consists of two paint booths (conveyorized) in series with drying ovens following each paint booth and a grinding process for grinding trim boards that don’t meet specifications. The saw and grinding processes have a new baghouse (Baghouse #10) for control of particulate emissions.

Additionally, the HAP opt out limits have been increased to 9.9 tpy for individual HAPs and 24.9 tpy for combined HAPs. And finally, a throughput limit on the existing dryer (EUDRYERRC) has been removed because the amount of wood dried can't be measured at the dryer but is back calculated based on finished product which is limited under EUPRESS. The finished product production limit under EUPRESS was increased from 90,500 tpy to 98,852 tpy which coincides with the requested increased HAP opt-out limits. The increase in the allowable finished product does not change the ton per year limits for PM-10, CO and VOC for EUPRESS because the "new" finished product limit of 98,852 tpy was the previous allowable finished product limit prior to the company taking the more stringent HAP limits of less than 9 tpy/less than 22.5 tpy in PTI 99-05A. The previous HAP opt-out limits were based on a finished product limit of 90,500 tpy. The emission limits were never changed for EUPRESS when the lower finished product limit was accepted in PTI 99-05A.

The PM10 and PM2.5 emission rates are based on measured grain loading from a similar process and baghouse at another facility with a safety factory of 3.5 for PM2.5 and 5.5 for PM10. Testing is required to verify the process emissions meet the permitted limits.

Rule 225:

The facility provided a demonstration utilizing Rule 227(1)(a) Table 21 AER matrix showing all TACs from the new processes (TACs emitted from natural gas combustion for the two drying ovens and formaldehyde from cutting/grinding of wood products) comply with Rule 225 except for formaldehyde. The facility provided an AERMOD modeling demonstration for formaldehyde emissions with impacts of 0.9% of the 24 hr ITSL (30 ug/m³) and 62.5% of the annual IRSL (0.08 ug/m³). All TACs proposed to be emitted from the new process meet Rule 225 requirements.

Rule 702:

Combined VOC emissions from the project are 0.34 tons per year. This includes 189 lbs per year from the combustion of natural gas and 482 lbs per year from the coating line. LP proposes to use a low VOC content water based coating capable of meeting LP's quality standard. This low VOC content water based coating is proposed as meeting VOC BACT requirements. The limit in the permit is 0.002 lb of VOC per gallon of coating minus water as applied. No add on control would be cost effective for the ovens or the coating line at this low of an emission rate. The coating booths will have exhaust cartridge filters for particulate control and LP has also accepted a coating usage limit of 240,940 gallons per year based on expected maximum production levels. An actual VOC limit is not necessary with the coating VOC content and coating usage limits in the permit.

Rule 702 requires an evaluation of the four subparts of the rule:

- the facility is not subject to 702(b), as no NSPS is applicable,
- there is not a VOC emission rate specified in another permit per Rule 702(c),
- and, there is not an applicable Part 6 Rule per Rule 702(d).
- Therefore, per Rule 702(a), the use of a low VOC content coating and a limit on coating usage meets VOC BACT requirements.

Total calculated VOC emissions from coating is as follows:

$$10.09 \text{ lb/gal} * 0.02\% (0.0002) = 0.002 \text{ lb VOC/gal}$$

$$0.002 \text{ lb/gal} * 240,940 \text{ gal/yr} = 481.88 \text{ lbs/yr or } 482 \text{ lb/yr}$$

Rule 301:

Visible emissions are limited to 10% opacity, except due to uncombined water vapor (Rule 301(1)(c)) from the baghouse (#10) for the saw and board grinding processes. LP will perform certified or non-certified visible emission readings a minimum of once per calendar day (when operating).

Rule 331:

PM emissions are limited to 0.010 lb per 1000 lbs of exhaust gases calculated on a dry gas basis. This equates to about 1.4 lbs/hr (1.39 lbs/hr in application) and 6.1 tons per year. This limit is more restrictive than required by Rule 331(1)(a) which specifies the maximum allowable limit as listed in Rule 331(3), Table 31 J. of 0.1 lb/1000 lbs.

NAAQS/INCREMENT:

Project emissions for all criteria pollutants are below 25% of their respective significant thresholds and the facility is an existing synthetic minor in terms of PSD requirements, therefore, per Table 1 (area has not triggered the minor source baseline) of the revised modeling guidance policy and procedure, no demonstration is required.

Changes to the May 23, 2016 Proposed ROP

1. Cover page, change “Dan W. Maki, Acting Upper Peninsula District Supervisor” to “Ed Lancaster, Upper Peninsula District Supervisor.”
2. SOURCE-WIDE, TABLE language updated as permitted in PTI# 99-05C for FGFACILITY;
3. SOURCE-WIDE, SC V.1 was inserted to ensure compliance as an opt-out source of Title V requirements for HAPs from all sources and emission units;
4. SOURCE-WIDE, SC VI.1 updated language inserted from PTI# 99-05C to ensure compliance as an opt-out source of Title V requirements for HAPs from all sources and emission units;
5. SOURCE-WIDE, SC VI.2 updated language inserted from PTI# 99-05C to ensure compliance as an opt-out source of Title V requirements for HAPs from all sources and emission units;
6. SOURCE-WIDE, SC VII.4 added semi-annual fugitive dust reporting requirements to ensure compliance with Fugitive Dust Control Program and SC IX.1;
7. SOURCE-WIDE, SC IX.1 inserted additional sentence referring to submittal of semiannual reporting as required in SC VII.4;
8. EUKONUSTOH, SC I TABLE language updated as permitted in PTI# 99-05C;
9. EUKONUSTOH, SC 2 TABLE language updated as permitted in PTI# 99-05C;
10. EUKONUSTOH, SC VI.1 inserted sentence from PTI# 99-05C clarifying required submittal of records “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. **(R 336.1213(3), R 336.1205(3))**”;
11. EUKONUSTOH, SC VI.2 inserted language from PTI# 99-05C redefining wood used “as received” instead of “wet” for calculating amount of wood burned;
12. EUKONUSTOH, SC VI.3 inserted additional sentence from PTI# 99-05C clarifying recordkeeping requirements “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.” **(R 336.1205(3))**;
13. EUKONUSTOH, SC VI.4 moved from SC VI.7 as is written in current ROP and PTI# 99-05C;

14. EUKONUSTOH, SC VI.5 was moved from SC VI.4 states, “The permittee shall record a daily non-certified visual opacity observation as an indicator of proper operation of the dust collector. The indicator is the presence of visible emissions. **(40 CFR 64.6(c)(1)(i and ii)).**”
15. EUKONUSTOH, SC VI.6 was moved from SC VI.5 “An excursion is a departure from the indicator range of no visible emissions. The indicator of no visible emissions indicates normal operations. **(40 CFR 64.6(c)(2))**”;
16. EUKONUSTOH, SC VI.7 was moved from SC VI.6 “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. **(40 CFR 64.7(d)).**”
17. EUDRYERRC, SC I TABLE language updated as permitted in PTI# 99-05C;
18. EUDRYERRC, SC II TABLE language updated as permitted in PTI# 99-05C;
19. EUDRYERRC, SC VI.1 inserted sentence from PTI# 99-05C clarifying submission of records “The permittee shall submit CO and VOC emission records with the semi-annual reports. **(R 336.1213(3), R 336.1205(3), R 336.1702(a))**”;
20. EUDRYERRC, SC VI.2 inserted sentence from PTI# 99-05C clarifying submission of records “The permittee shall submit the RTO hourly average combustion temperature summary records with the semi-annual reports. **(40 CFR 64.6(c)(1), 40 CFR 64.7, 40 CFR 64.9)**”;
21. EUDRYERRC, SC VI.5 replaced with SC VI.7;
22. EUDRYERRC, SC VI.6 replaced with SC VI.8;
23. EUDRYERRC, SC VI.7 replaced with language from PTI# 99-05C “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. **(40 CFR 64.6(c)(2), 40 CFR 64.7(d))**”;
24. EUDRYERRC, SC VI.8 replaced with language from PTI# 99-05C “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. **(R 336.1910, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**”;
25. EUDRYERRC, SC VI.9 replaced with SC VI.12;

26. EUDRYERRC, SC VI.10 replaced with language from PTI# 99-05C “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. **(R 336.1910, 40 CFR Part 64, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**”;
27. EUDRYERRC, SC VI.11 replaced with language from PTI# 99-05C “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. **(R 336.1910, 40 CFR Part 64, 40 CFR 64.6(c)(2), 40 CFR 64.7, 40 CFR 64.9)**”;
28. EUDRYERRC, SC VI.12 replaced with SC VI.17;
29. EUDRYERRC, SC VI.13 replaced with SC VI.18 with the following sentence added from PTI# 99-05C “The permittee shall submit monthly records of the amount of coniferous and non-coniferous wood used with the semi-annual reports. **(R 336.1205(3), R 336.1213(3))**”;
30. EUDRYERRC, SC VI.14 replaced with SC VI.19;
31. EUDRYERRC, SC VI.15 replaced with SC VI.21, but with original language from current ROP and PTI# 99-05C re-inserted “The permittee shall, at all times, maintain the RTO and Wet ESP monitoring system, including, but not limited to, maintaining keeping necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))**”;
32. EUDRYERRC, SC VI.16 replaced with language from PTI# 99-05C “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. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**”;
33. EUDRYERRC, SC VI.17 replaced with language from the current ROP and PTI# 99-05C “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 336.1301, R 336.1331, R 336.1910)**”;
34. EUDRYERRC, SC VI.18 replaced with language from the current ROP and PTI# 99-05C “The permittee shall submit records of the amount of finished product produced with the semi-annual reports. **(R 336.1201(3))**”;
35. EUDRYERRC, SC VI.19 was renumbered to SC VI.14;
36. EUDRYERRC, SC VI.20 was deleted;
37. EUDRYERRC, SC VI.21 was renumbered to SC VI.15;
38. EUDRYERRC, SC VI.22 was deleted;

State Registration Number
N0780

RENEWABLE OPERATING PERMIT
JANUARY 31, 2020 - STAFF REPORT FOR RULE
216(2) MINOR MODIFICATION

ROP Number
MI-ROP-N0780-2018a

Purpose

On February 18, 2018, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-N0780-2018 to Louisiana Pacific Corporation - Newberry Plant pursuant to Rule 214 of the administrative rules promulgated under Act 451. Once issued, a company is required to submit an application for changes to the ROP as described in Rule 216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to Rule 216(2).

General Information

Responsible Official:	Jack Johnson, Plant Manager 906-293-4512
AQD Contact:	Caryn E. Owens, Environmental Engineer 231-878-6688
Application Number:	201900186
Date Application for Minor Modification was Submitted:	November 12, 2019

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for a Minor Modification pursuant to Rule 216(2).

Description of Changes to the ROP

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.

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.

Additionally, the facility requested the removal of EUTRIMSAW&GRIND and EUTRIMPAINT from the ROP since these processes were never installed at the facility.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Minor Modification to the ROP.

Action Taken by EGLE

The AQD proposes to approve a Minor Modification to ROP No. MI-ROP-N0780-2018, as requested by the stationary source. A final decision on the Minor Modification to the ROP will not be made until any affected states and the United States Environmental Protection Agency (USEPA) has been allowed 45 days to review the proposed changes to the ROP. The delegated decision maker for the AQD is the District Supervisor. The final determination for approval of the Minor Modification will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other requirements, and resolution of any objections by any affected states or the USEPA.