

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

EFFECTIVE DATE: July 22, 2019  
REVISION DATE: January 7, 2020

ISSUED TO

**PotlatchDeltic Land & Lumber, LLC - Gwinn Lumber**

State Registration Number (SRN): N5940

LOCATED AT

650 A. Avenue, Gwinn, Marquette County, Michigan 49841

**RENEWABLE OPERATING PERMIT**

Permit Number: MI-ROP-N5940-2019a

Expiration Date: July 22, 2024

Administratively Complete ROP Renewal Application Due Between  
January 22, 2023 and January 22, 2024

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 Rule 210(1) of the administrative rules promulgated under Act 451, 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-N5940-2019a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(1) of Act 451. Pursuant to Rule 214a of the administrative rules promulgated under Act 451, 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

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

### Emission Limits

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

The grading of visible emissions shall be determined in accordance with Rule 303.

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

### Testing/Sampling

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

## Monitoring/Recordkeeping

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

## Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3507. **(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))**
  - a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
  - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that; "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete." The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.<sup>2</sup> **(R 336.1912)**

## Permit Shield

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

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.

27. Nothing in this ROP shall alter or affect any of the following:
  - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
  - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
  - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
  - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
  - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
  - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
  - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

## Revisions

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

## Reopenings

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

## Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(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.<sup>2</sup> **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.<sup>2</sup> **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, EGLE.<sup>2</sup> **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, 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.<sup>2</sup> **(R 336.1201(4))**

#### **Footnotes:**

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

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

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

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

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

## SOURCE-WIDE CONDITIONS

### DESCRIPTION

All equipment and processes at the source including grand-fathered and exempt equipment.

### POLLUTION CONTROL EQUIPMENT

NA

#### I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Each individual HAP	Less than 9.0 tpy <sup>2</sup>	12 month rolling time period as determined at the end of each calendar month.	NA	SC VI.2	<b>R 336.1205(1)</b>
2. Aggregate HAPs	Less than 24.0 tpy <sup>2</sup>	12 month rolling time period as determined at the end of each calendar month.	NA	SC VI.2	<b>R 336.1205(1)</b>

#### II. MATERIAL LIMIT(S)

NA

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

NA

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

NA

#### V. TESTING/SAMPLING

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

NA

#### VI. MONITORING/RECORDKEEPING

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month.<sup>2</sup> **(R 336.1205(1), R 336.1213(3)(b))**
2. The permittee shall keep the following information on a monthly basis:<sup>2</sup> **(R 336.1205(1), R 336.1213(3)(b))**
  - a. The quantity of each HAP containing material used or emitted;
  - b. The HAP emission factor of each HAP containing material used or emitted (emission factors are to be based on testing at the facility or as approved by the AQD District Supervisor);
  - c. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month;

- d. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12 month rolling time period as determined at the end of each calendar month.

**See Appendix 4**

## **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)**

1. The permittee shall implement and maintain a facility-wide Malfunction Abatement Plan (MAP) approved by the District Supervisor. If the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the MAP within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment and add-on air pollution control device during similar malfunction events, and a program for corrective action for such events. **(R 336.1910, R 336.1911)**
2. The permittee shall maintain a program of fugitive dust control for all material storage piles, all material handling equipment, all plant roadways, and the plant yard as approved by the AQD. Changes to the program may be made upon approval by the AQD. **(R 336.1371)**

### **Footnotes:**

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

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

### C. EMISSION UNIT SPECIAL 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
EU-WOODBOILER1	28.7 MMBtu/hr wood-fired boiler with a primary and secondary multiclone.	1996 / NA	FG-WOODBOILERS
EU-WOODBOILER2	28.7 MMBtu/hr wood-fired boiler with a primary and secondary multiclone.	1996 / NA	FG-WOODBOILERS
EU-GASBOILER	48.8 MMBtu/hr natural gas-fired boiler with a steam generating capacity of 27,600 lb/hr	2001 / NA	NA
EU-DRYKILN1	Indirect heated steam kilns with no emission controls.	1997 / NA	FG-DRYKILN
EU-DRYKILN2	Indirect heated steam kilns with no emission controls.	1997 / NA	FG-DRYKILN
EU-DRYKILN3	Indirect heated steam kilns with no emission controls.	1997 / NA	FG-DRYKILN
EU-DRYKILN4	Direct heated natural gas-fired kiln with no emission controls.	2006 / 2017	FG-DRYKILN
EU-PLANER	Dimensions finisher on post-kiln lumber and associated baghouse.	1997 / NA	FG-PLANERSYSTEM
EU-ENDTRIMMER1	Size reduction green lumber saw and associated baghouse.	1997 / NA	FG-PLANERSYSTEM
EU-ENDTRIMMER2	Size reduction dry lumber saw and associated baghouse.	1997 / 2013	FG-PLANERSYSTEM
EU-ENDTRIMMER3	Size reduction green lumber saw and associated baghouse.	1997 / NA	FG-PLANERSYSTEM
EU-TRAILERS	Holding and transport of wood shavings.	1997 / NA	FG-PLANERSYSTEM
EU-PNEUMATICLINE	A material handling system that pneumatically conveys green chips through one of three blow lines. Each line is dedicated to either the chip pile, rail car, or truck bin. The truck bin line is equipped with a cyclone that allows the separation of wood chips from air.	1997 / NA	NA
EU-FIREPUMP1	231 HP compression ignition emergency fire pump engine.	1987 / NA	FG-FIREPUMPS
EU-FIREPUMP2	231 HP compression ignition emergency fire pump engine.	1987 / NA	FG-FIREPUMPS
EU-GENERATOR	A 200 KW diesel-fueled emergency generator manufactured in 2013.	2013 / NA	NA

<b>EU-GASBOILER EMISSION UNIT CONDITIONS</b>
--

**DESCRIPTION**

Natural gas fired boiler rated at 800 HP with a heat input capacity of 48.8 MMBtu/hr.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall only burn natural gas in EU-GASBOILER. **(40 CFR 60.48c(g)(2))**

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

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall record and maintain records of the amount of natural gas combusted during each calendar month. **(40 CFR 60.48c(g)(2))**

**See Appendix 4**

**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)**

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. **(40 CFR Part 63, Subpart JJJJJJ)**
2. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart Dc - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. **(40 CFR Part 60, Subpart Dc)**

**Footnotes:**

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

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

**EU-PNEUMATICLINE  
EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A material handling system that pneumatically conveys green chips through one of three blow lines. Each line is dedicated to either the chip pile, rail car, or truck bin. The truck bin line is equipped with a cyclone that allows the separation of wood chips from air.

Flexible Group ID: NA

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	11.7 pph <sup>2</sup>	Hourly	EU-PNEUMATICLINE	SC V.1 SC VI.2	R 336.1331(1)(c)

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall implement and maintain an AQD approved fugitive dust plan for EU-PNEUMATICLINE. The plan shall include procedures for maintaining and operating EU-PNEUMATICLINE in a satisfactory manner and corrective actions to be taken during malfunctions.<sup>2</sup> (R 336.1371, R 336.1910, R 336.1911)
2. The permittee shall restrict the loading operation of the truck bin to less than 5,075 hours per year. (R 336.1213(2)(d))

**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. Upon request of the Department, the permittee shall verify PM emission rates from the truck bin cyclone by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved USEPA Method listed in 40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules. An alternate method, or a modification to the approved USEPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

2. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted. **(R 336.1213(3), R 336.2001(4))**

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

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

1. The permittee shall monitor and record the daily hours of operation of the truck bin loading. **(R 336.1213(3)(b))**
2. The permittee shall perform and document non-certified visible emissions observations from EU-PNEUMATICLINE on a daily basis when operating. If during the observation there are any visible emissions detected, the permittee shall implement corrective action immediately to restore normal operation and prevent the likely recurrence of the cause of the excursion. Records of the non-certified visible emissions observations, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. **(R 336.1213(3), R 336.1301(1)(a))**

**See Appendix 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)**

NA

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

NA

#### **Footnotes:**

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

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

**EU-GENERATOR  
 EMISSION UNIT CONDITIONS**

**DESCRIPTION**

A 200 KW diesel-fueled emergency generator manufactured in 2013.

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. NMHC + NOx	4.0 g/kW-hr	Hourly	EU-GENERATOR	SC III.2	40 CFR 60.4205(b)
2. CO	3.5 g/kW-hr	Hourly	EU-GENERATOR	SC III.2	40 CFR 60.4205(b)
3. PM	0.20 g/kW-hr	Hourly	EU-GENERATOR	SC III.2	40 CFR 60.4205(b)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Sulfur content of diesel fuel	15 ppmw	Instantaneous	EUGENERATOR	SC VI.3	40 CFR 60.4207(b) 40 CFR 80.510(b)

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

- The permittee may operate EU-GENERATOR for no more than 100 hours per calendar year for the purpose of necessary maintenance checks and readiness testing, providing that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The permittee may operate up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply non-emergency power as part of a financial arrangement with another entity.  
**(40 CFR 60.4211)**
- The permittee shall operate and maintain EU-GENERATOR according to manufacturer's emission-related written instructions. **(40 CFR 60.4211(a))**
- The permittee may change only those emission-related settings that are permitted by the manufacturer.  
**(40 CFR 60.4211(a))**

**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 manufacturer certification documentation indicating that EU-GENERATOR meets the applicable emission limitations contained in the federal Standards of Performance for New Stationary Sources 40 CFR Part 60, Subpart IIII. **(40 CFR 60.4211, R 336.1213(3)(b))**
2. The permittee shall monitor and record the hours of operation during non-emergencies for EU-GENERATOR on a monthly and 12 month rolling time period basis. **(R 336.1213(3)(b))**
3. The permittee shall keep fuel supplier certification records or fuel sample test data, for each delivery of diesel fuel, demonstrating that the sulfur content meets the limit in Condition II.1. **(R 336.1213(3)(b))**

**See Appendices 3 and 4**

**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)**

1. The permittee shall meet the requirements of 40 CFR Part 89 as it applies to EU-GENERATOR. **(40 CFR 60.4211(a))**
2. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. **(40 CFR Part 60, Subpart IIII)**
3. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Area Sources. **(40 CFR Part 63, Subpart ZZZZ)**

**Footnotes:**

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

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

## D. FLEXIBLE GROUP SPECIAL 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
FG-WOODBOILERS	Two 28.7 MMBtu/hr wood fired boilers and associated pollution control equipment.	EU-WOODBOILER1 EU-WOODBOILER2
FG-DRYKILNS	Three indirect steam heated kilns and one direct natural gas-fired kiln used for drying Jack Pine, Red Pine, Spruce, Balsam, White Pine, Tamarack, and other native species.	EU-DRYKILN1 EU-DRYKILN2 EU-DRYKILN3 EU-DRYKILN4
FG-PLANERSYSTEM	Rough dry kilned lumber is dimensioned with a high-speed planer and three end trimmers. Shavings are loaded into semi-truck trailers and trucked off site.	EU-PLANER EU-ENDTRIMMER1 EU-ENDTRIMMER2 EU-ENDTRIMMER3 EU-TRAILERS
FG-FIREPUMPS	Two 231 HP compression ignition emergency fire pump engines.	EU-FIREPUMP1 EU-FIREPUMP2

**FG-WOODBOILERS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Two 28.7 MMBtu/hr wood fired boilers.

**Emission Units:** EU-WOODBOILER1, EU-WOODBOILER2

**POLLUTION CONTROL EQUIPMENT**

Primary and secondary multiclones

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Benzo(a)pyrene	9.7 micrograms per cubic meter <sup>1</sup>	Hourly	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1225</b>
2. Benzo(a)pyrene	0.0006 pounds per hour <sup>1</sup>	Hourly	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1225</b>
3. Benzo(a)pyrene	0.0027 tpy <sup>1</sup>	12 month rolling time period as determined at the end of each calendar month	EUWOODBOILER1 EUWOODBOILER2	SC VI.3	<b>R 336.1225</b>
4. CO	0.50 pounds per MMBTU heat input <sup>2</sup>	8-hour average	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1205(1)</b>
5. CO	14.35 pph <sup>2</sup>	Hourly	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1205(1)</b>
6. CO	62.85 tpy <sup>2</sup>	12 month rolling time period, as determined at the end of each calendar month	EUWOODBOILER1 EUWOODBOILER2	SC VI.3	<b>R 336.1205(1)</b>
7. PM	0.20 pounds per MMBTU heat input <sup>2</sup>	Hourly	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1331(1)(c)</b>
8. PM	5.7 pph <sup>2</sup>	Hourly	EUWOODBOILER1 EUWOODBOILER2	SC V.1	<b>R 336.1331(1)(c)</b>
9. PM	25.1 tpy <sup>2</sup>	12 month rolling time period, as determined at the end of each calendar month	EUWOODBOILER1 EUWOODBOILER2	SC VI.3	<b>R 336.1331(1)(c)</b>

**II. MATERIAL LIMIT(S)**

- The permittee shall not burn any wood, wood residue, or wood waste which is painted or treated with wood preservatives.<sup>1</sup> (**R 336.1224, R 336.1225**)

- 2. The permittee shall not burn in FG-WOODBOILERS any other waste, except for on-site spill cleanups such as floor sweeps or ground spills of: spilled oil, hydraulic fluid, antifreeze, and spent boiler chemicals. The permittee shall not burn any other material in FG-WOODBOILERS without prior notice to and approval by the AQD. Upon notification by the AQD, a performance test may be required, prior to approval of the use of any other waste fuel.<sup>1</sup> (R 336.1224, R 336.1225, R 336.1901)
- 3. The permittee shall not burn in FG-WOODBOILERS more than two gallons per hour of the acceptable waste fuels listed in Special Condition II.2.<sup>2</sup> (R 336.1224, R 336.1225, R 336.1702)

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

- 1. The permittee shall install, maintain, and calibrate a device to measure the differential pressure across the multiclones.<sup>2</sup> (R 336.1910)

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

- 1. The permittee shall not operate the boilers unless the primary and secondary multiclones are installed and operated properly.<sup>2</sup> (R 336.1301, R 336.1331(1)(c), R 336.1910)

**V. TESTING/SAMPLING**

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

- 1. The permittee shall verify benzo(a)pyrene, CO, and PM emission rates from FG-WOODBOILERS by testing at the owner's expense, in accordance with the Department requirements. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
CO	40 CFR Part 60, Appendix A
Benzo(a)pyrene	SW 846 Method 0010

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing, including any modifications to the method in the test protocol that are proposed after initial submittal. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. (R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)

- 2. The permittee shall verify benzo(a)pyrene, CO, and PM emission rates from FG-WOODBOILERS, 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)
- 3. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days of the time and place before performance tests are conducted. (R 336.1213(3))

See Appendix 5

**VI. MONITORING/RECORDKEEPING**

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

- 1. The permittee shall keep hourly records of the type and amount (in gallons) of the following fuels: spilled oils, hydraulic fluids, antifreeze, and spent boiler chemicals. AQD reserves the right to obtain samples of the sweepings from the floor and ground cleanups at any time for the purpose of determining compliance with this permit.<sup>1</sup> (R 336.1224, R 336.1225)
- 2. The permittee shall maintain records of the amount of wood fuel combusted during each calendar month. (40 CFR 60.48c(g)(2))

3. The permittee shall calculate and record CO, PM, and benzo(a)pyrene emissions in tons per year, based on a 12-month rolling time period using the equations in Appendix 7 and emission factors from the most recent performance test. **(R 336.1213(3)(b))**
4. The permittee shall monitor and record the differential pressure across the multiclones once per shift in a manner and with instrumentation acceptable to the AQD. **(R 336.1213(3)(b))**

**See Appendices 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. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to each anticipated test date. **(R 336.2001(3), R 336.1213(3))**
5. The permittee shall notify the AQD no less than 7 days prior to each anticipated test date. **(R 336.2001(4), R 336.1213(3))**
6. The permittee shall submit two complete test reports to the AQD, one to the Technical Programs Unit and one to the district office, within 60 days following the last date of each test. **(R 336.2001(5), R 336.1213(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:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter / Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVBOILER1	30.25 <sup>2</sup>	55 <sup>2</sup>	<b>R 336.2803, R 336.2804 40 CFR 52.21(c) and (d)</b>
2. SVBOILER2	30.25 <sup>2</sup>	55 <sup>2</sup>	<b>R 336.2803, R 336.2804 40 CFR 52.21(c) and (d)</b>

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. **(40 CFR Part 63, Subpart JJJJJJ)**
2. The permittee shall comply with the applicable requirements of 40 CFR Part 60, Subpart Dc - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. **(40 CFR Part 60, Subpart Dc)**

**Footnotes:**

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

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

**FG-DRYKILNS  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Three indirect steam heated kilns and one direct natural gas-fired kiln used for drying Jack Pine, Red Pine, Spruce, Balsam, White Pine, Tamarack, and other native species.

**Emission Units:** EU-DRYKILN1, EU-DRYKILN2, EU-DRYKILN3, EU-DRYKILN4

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC as carbon	176.8 tpy <sup>2</sup>	12-month rolling time period as determined at the end of each calendar month.	FG-DRYKILNS	SC VI.2	R 336.1205(1)(a)&(3) R 336.1225 R 336.1702(a)

**II. MATERIAL LIMIT(S)**

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Red Pine	210,000,000 board feet per year <sup>2</sup>	12 month rolling time period as determined at the end of each calendar month	FG-DRYKILNS	SC VI.2	R 336.1205(1)(a)&(3) R 336.1225 R 336.1702(a)
2. Wood	220,000,000 board feet per year <sup>2</sup>	12 month rolling time period as determined at the end of each calendar month	FG-DRYKILNS	SC VI.2	R 336.1205(1)(a)&(3) R 336.1225 R 336.1702(a)

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

- The permittee shall only use FG-DRYKILNS to dry Jack Pine, Red Pine, Spruce, Balsam, and insignificant amounts of White Pine, Tamarack, and other native species.<sup>2</sup> (R 336.1702(a), R 336.1901)

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

NA

**V. TESTING/SAMPLING**

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

NA

**VI. MONITORING/RECORDKEEPING**

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

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15<sup>th</sup> day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a))**
2. The permittee shall maintain records of the following information on a monthly basis for FG-DRYKILNS:
  - a. Each wood species and amount of board feet dried per calendar month;
  - b. Each wood species and amount of board feet dried per 12-month rolling time period as determined at the end of each calendar month;
  - c. The VOC emission factor (in lbs carbon per amount of board feet) for each wood species dried;
  - d. VOC mass emission calculations determining the monthly emission rate in tons per calendar month using the equations in Appendix 7.
  - e. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month using the equations in Appendix 7.
3. The permittee shall keep all records on file and make them available to the Department upon request.<sup>2</sup> **(R 336.1205(1)(a) & (3), R 336.1225, R 336.1702(a))**

**See Appendix 7**

## **VII. REPORTING**

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

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

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

**FG-PLANERSYSTEM  
 FLEXIBLE GROUP CONDITIONS**

**DESCRIPTION**

Rough dry kilned lumber is dimensioned with a high speed planer and three end trimmers. Shavings are loaded into semi-truck trailers and trucked off site.

**Emission Units:** EU-PLANER, EU-ENDTRIMMER1, EU-ENDTRIMMER2, EU-ENDTRIMMER3, EU-TRAILERS

**POLLUTION CONTROL EQUIPMENT**

Baghouse

**I. EMISSION LIMIT(S)**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. PM	0.01 gr/dscf of exhaust air <sup>2</sup>	Hourly	FG-PLANERSYSTEM	SC VI.1 SC VI.3	<b>R 336.1331(1)(c)</b>
2. PM	5.2 pph <sup>2</sup>	Hourly	FG-PLANERSYSTEM	SC VI.1 SC VI.3	<b>R 336.1331(1)(c)</b>

**II. MATERIAL LIMIT(S)**

NA

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

1. The permittee shall maintain the differential pressure across the baghouse within the indicator range of 0.1 to 6.0 inches of water column. **(R 336.1910, R 336.1911)**

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

1. The permittee shall not operate FG-PLANERSYSTEM unless the baghouse is installed, maintained, and operating properly.<sup>2</sup> **(R 336.1301, R 336.1331(1)(c), R 336.1910)**
2. The permittee shall install, maintain, and calibrate a device to measure the differential pressure across the baghouse. **(40 CFR 64.4(e), R 336.1910)**

**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 perform visible emission observations at least once per calendar month when FG-PLANERSYSTEM is operating using USEPA Method 22 (40 CFR Part 60, Appendix A). If any visible emissions are observed, the permittee shall implement the following actions:<sup>2</sup> **(R 336.1301, R 336.1331(1)(a), R 336.1910, R 336.1213(3), 40 CFR 64.4(e), 40 CFR 64.6(d))**
  - a. Immediately cease charging FG-PLANERSYSTEM;

- b. Determine the cause of the excess visible emissions within four hours of discovery;
  - c. Identify and implement corrective measures to reduce/eliminate the excessive visible emissions within eight hours or initiate shutdown of FG-PLANERSYSTEM consistent with the provisions of the malfunction abatement plan.
2. The permittee shall maintain records, in a manner acceptable to the AQD, of all visible emissions readings for FG-PLANERSYSTEM. At a minimum, the records shall include the date, time, name of observer/reader, whether the reader is certified, and the status of visible emissions.<sup>2</sup> **(R 336.1301, 40 CFR 64.6(c)(1)(i and ii))**
  3. The permittee shall monitor and record the differential pressure across the baghouse once per day in a manner and with instrumentation acceptable to the AQD. An indicator range of 0.1 to 6.0 inches of water column ensures proper operation of the dust collector and compliance with the PM limits in Conditions I.1 and 2. This condition does not affect compliance with R 336.1331. **(40 CFR 64.6(c)(1)(i & iii), 40 CFR 64.6(c)(4), R 336.1213(3)(b))**
  4. An excursion for PM emissions shall be a differential pressure reading across the baghouse outside of the indicator range of 0.1 to 6.0 inches of water column. **(40 CFR 64.6(c)(2))**
  5. Upon detecting an excursion, the permittee shall restore operation of FG-PLANERSYSTEM 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. The date, time, and duration of any excursion and corrective actions taken shall be recorded. **(40 CFR 64.7(d), R 336.1213(3)(b))**
  6. The permittee shall properly maintain the monitoring systems, including keeping necessary parts for routine repair of the differential pressure monitoring equipment. **(40 CFR 64.7(b))**
  7. 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))**
  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 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), 40 CFR 64.7(c))**

**See Appendices 3 and 4**

## **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 the corrective actions taken. If there were no excursions, then this report shall include a statement that there were no excursions. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**

**See Appendix 8**

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

NA

**IX. OTHER REQUIREMENT(S)**

1. 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))**
2. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

**Footnotes:**

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

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

<b>FG-FIREPUMPS FLEXIBLE GROUP CONDITIONS</b>
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**DESCRIPTION**

Two 231 HP compression ignition emergency fire pump engines.

**Emission Units:** EU-FIREPUMP1, EU-FIREPUMP2

**POLLUTION CONTROL EQUIPMENT**

NA

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

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

1. Each engine in FG-FIREPUMPS shall be installed, maintained, and operated in a satisfactory manner. The permittee shall conduct the recommended work practice standards as specified in 40 CFR 63.6602 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 recommended work practices specified in 40 CFR Part 63, Subpart ZZZZ Table 2d: **(40 CFR 63.6603(a) and Table 2d Item 4(a – c))**
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.2,
  - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
2. 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 specified for changing the oil in Table 2d of 40 CFR Part 63, Subpart ZZZZ. **(40 CFR 63.6625(j))**
3. The permittee shall operate each engine in FG-FIREPUMPS in compliance with the emission limitations and operating limitations in this subpart. Each CI 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 engine in FG-FIREPUMPS 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 engine in FG-FIREPUMPS 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 exceed 100 hours per year for maintenance checks and readiness testing for each engine in FG-FIREPUMPS. 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)(2))**
7. The permittee may operate each engine in FG-FIREPUMPS for non-emergency situations for up to 50 hours per year as allowed in 40 CFR 63.6640 (f)(1)(iii). **(40 CFR 63.6640(f)(3))**

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

1. The permittee shall equip and maintain each engine in FG-FIREPUMPS with a non-resettable hour meter to track the hours of operation. **(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 the oil analysis program, the permittee must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. **(40 CFR 63.6625(j))**

**See Appendix 5**

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

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

1. For each engine in FG-FIREPUMPS the permittee shall keep in a satisfactory manner, records of the occurrence and duration of each malfunction of operation or the air pollution control 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 engine in FG-FIREPUMPS 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 engine in FG-FIREPUMPS the permittee shall keep in a satisfactory manner, records to demonstrate continuous compliance with the operating limitations. 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 engine in FG-FIREPUMPS the permittee shall keep in a satisfactory manner, records of the maintenance conducted to demonstrate that 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 engine in FG-FIREPUMPS 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)**

**See Appendices 3 and 4**

## **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 any performance test reports, including RATA reports, to the AQD Technical Programs Unit and District Office, in a format approved by the AQD. **(R 336.1213(3)(c), R 336.2001(5))**

**See Appendix 8**

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

NA

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

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Area Sources. **(40 CFR Part 63, Subpart ZZZZ)**

### **Footnotes:**

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

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

## **E. NON-APPLICABLE REQUIREMENTS**

At the time of the ROP issuance, the AQD has determined that 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 <sub>2</sub> e	Carbon Dioxide Equivalent
CEMS	Continuous Emission Monitoring System	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
Department/ department	Michigan Department of Environment, Great Lakes, and Energy	gr	Grains
EGLE	Michigan Department of Environment, Great Lakes, and Energy	HAP	Hazardous Air Pollutant
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallons of Applied Coating Solids	HP	Horsepower
GC	General Condition	H <sub>2</sub> S	Hydrogen Sulfide
GHGs	Greenhouse Gases	kW	Kilowatt
HVLP	High Volume Low Pressure*	lb	Pound
ID	Identification	m	Meter
IRSL	Initial Risk Screening Level	mg	Milligram
ITSL	Initial Threshold Screening Level	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	NMOC	Non-methane Organic Compounds
MAP	Malfunction Abatement Plan	NO <sub>x</sub>	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	ng	Nanogram
NA	Not Applicable	PM	Particulate Matter
NAAQS	National Ambient Air Quality Standards	PM10	Particulate Matter equal to or less than 10 microns in diameter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	%	Percent
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 <sub>2</sub>	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

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

**Appendix 2. Schedule of Compliance**

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

**Appendix 3. Monitoring Requirements**

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**

**FG-WOODBOILERS**

The permittee shall use the following table to monitor and record the type and amount (in gallons) of spilled oils, hydraulic fluids, antifreeze, and spent boiler chemicals fired in FG-WOODBOILERS.

Date	Time	Amount of Oil (gal)	Depth in Fuel Room (ft)	Type of Spill	Burn Rate (gal/hr)

**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-N5940-2013. 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-N5940-2013a is being reissued as Source-Wide PTI No. MI-PTI-N5940-2019.

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201600171	The request is to modify the testing, monitoring, and recordkeeping language in the ROP for EU-PNEUMATICLINE, since the existing language requires performance testing on the emission unit. It is not possible to complete stack testing without a significant modification to the control equipment to accommodate the testing. The modified special conditions were added to the ROP through the ROP process, and not through the permit to install process. For EUPNEUMATICLINE, performance testing is unusual and unnecessary to show compliance with the emission limit. Therefore, the following changes were made to EUPNEUMATICLINE:	EU-PNEUMATICLINE FG-PLANERSYSTEM

		<p>the testing method in Section V was changed to visible emission readings, recordkeeping requirements were added to Section VI, and reporting conditions regarding the performance testing were removed from Section VII.</p> <p>Additionally, PotlatchDeltic requested to keep consistent the use of abbreviation "SC" (Special Condition) for the referenced conditions in the "Monitoring/Testing Method" portions of the Emission Unit and Material Limit tables throughout the ROP.</p> <p>Also, The Conditions in FG-PLANERSYSTEM V.1 and V.2 were accidentally split during the Renewal of the ROP, and these two Conditions were combined back into one Condition.</p>	
30-16	201600195	Incorporate PTI 30-16, which removes the stack requirements for Kiln #4 and replaces it with roof vents similar to the other three kilns.	EU-DRYKILN4 FG-DRYKILN
59-18	201800148*	Incorporated PTI 59-18. This PTI reviewed the proposed addition of two natural gas fired burners into Kiln 4 and requested changes to special conditions in the ROP. A summary of the changes include: decreasing single and aggregate HAP emissions for the source to 9 tpy and 24 tpy, EU-PNEUMATICLINE descriptions were changed by removing "controlled by a cyclone," the new burners modification to Kiln 4 was determined to be exempt, the methanol emission limit in FG-DRYKILNS was removed, the material limits for Red Pine and Wood were increased in FG-DRYKILNS, and emissions testing to correlate PM emissions with the differential pressure across the baghouse was removed in FG-PLANERSYSTEM.	FG-FACILITY FG-DRYKILNS FG-PLANERSYSTEM EU-PNEUMATICLINE

The following table lists the ROP amendments or modifications issued after the effective date of ROP No. MI-ROP N5940-2019.

Permit to Install Number	ROP Revision Application Number - Issuance Date	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201900162 / January 7, 2020	This Minor Modification was to clarify that the Emission Limit established in EU-PNEUMATICLINE applies to the truck bin cyclone, since the other two blow lines (the chip pile and rail car) are drop points that are covered under the facility's Fugitive Dust Plan. Additionally, a testing Condition was added in case the District requests the facility to show they can meet the established Emission Limit. The Company also reports EU-PNEUMATICLINE to the Michigan Air Emission Reporting System (MAERS) on an annual basis that uses emission factors and production data to show compliance with the emission limit.	EU-PNEUMATICLINE

**Appendix 7. Emission Calculations**

**FG-WOODBOILERS**

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

A. CO emissions

$$CO = \sum_{i=1}^{12} \left( EF \times BTU \times FUEL_i \times \frac{1 \text{ ton}}{2,000 \text{ pounds}} \right)$$

Where:

- CO = CO emissions, tons per year based on a 12 month rolling time period;
- EF = Emission factor derived from the most recent stack test, pounds/MMBTU;
- BTU = Heat value of fuel, MMBTU/ton of fuel;
- FUEL<sub>i</sub> = Amount of fuel burned during month “i”, tons.

B. PM emissions

$$PM = \sum_{i=1}^{12} \left( EF \times BTU \times FUEL_i \times \frac{1 \text{ ton}}{2,000 \text{ pounds}} \right)$$

Where:

- PM = PM emissions, tons per year based on a 12 month rolling time period;
- EF = Emission factor derived from the most recent stack test, pounds/MMBTU;
- BTU = Heat value of fuel, MMBTU/ton of fuel;
- FUEL<sub>i</sub> = Amount of fuel burned during month “i”, tons.

C. Benzo(a)pyrene emissions

$$B(a)p = \sum_{i=January}^{December} \left( EF \times T_i \times \frac{1 \text{ ton}}{2,000 \text{ pounds}} \right)$$

Where:

- B(a)p = Benzo(a)pyrene emissions, in tons per year;
- EF = Emission factor derived from most recent stack test, pph;
- T<sub>i</sub> = Hours of operation during month “i”.

**FG-DRYKILNS**

1. The permittee shall use the following calculations in conjunction with monitoring, testing or recordkeeping data to determine compliance with the applicable requirements referenced in FG-DRYKILNS.

A. VOC Emissions

$$VOC = \sum_{i=1}^{12} \left( (EF_{JP} \times JP_i) + (EF_{RP} \times RP_i) + (EF_S \times S_i) + (EF_B \times B_i) \right) \times \frac{1 \text{ ton}}{2,000 \text{ pounds}}$$

Where:

- VOC = VOC as carbon emissions, tons per year based on a 12 month rolling time period;
- EF<sub>JP</sub> = AQD approved emission factor for jack pine, pounds of carbon per thousand board feet (C/MBF);
- JP<sub>i</sub> = Amount of jack pine dried in the kilns during calendar month “i”, MBF;
- EF<sub>RP</sub> = AQD approved emission factor for red pine, pounds C/MBF;

$RP_i$  = Amount of red pine dried in the kilns during calendar month "i", MBF;

$EF_S$  = AQD approved emission factor for spruce, pounds C/MBF;

$S_i$  = Amount of spruce dried in the kilns during calendar month "i", MBF;

$EF_B$  = AQD approved emission factor for balsam, pounds C/MBF;

$B_i$  = Amount of balsam dried in the kilns during calendar month "i", MBF.

## **Appendix 8. Reporting**

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

The permittee shall use 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.