

Rec 12-12-23

202300169

**Ruokolainen, Nadine (EGLE)**

**From:** Amy Benson <Amy.Kuivanen@PotlatchDeltic.com>  
**Sent:** Tuesday, December 12, 2023 3:39 PM  
**To:** EGLE-ROP  
**Cc:** James Pearson; Thomas Mosher; tvantil@comcast.net  
**Subject:** N5940 - ROP Renewal Application  
**Attachments:** N5940 ROP Application Signed.pdf; N5940\_ROP\_MARK-UP.docx; 2024 PotlatchDeltic Gwinn MAPv.3.pdf; 425 - Fugitive Dust(final).pdf

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hello,

I've attached the PotlatchDeltic Land & Lumber, LLC (N5940) ROP Renewal Application. Attached is:

- N5940 ROP Renewal Application
- N5940 ROP Mark-up
- Plans referenced in ROP
  - o N5940 Malfunction Abatement Plan
  - o N5940 Fugitive dust plan
  - o N5940 CAM plan is not attached – no changes

Thank you,

Amy Benson  
Environmental Manager  
PotlatchDeltic  
Wood Products Division  
Gwinn, MI



## RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.*

### GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

### PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

#### SOURCE INFORMATION

|  |                  |                      |   |                                |
|--|------------------|----------------------|---|--------------------------------|
| SRN<br>N5940   | SIC Code<br>2421 | NAICS Code<br>321113 | Existing ROP Number<br>MI-ROP-N5940-2019a | Section Number (if applicable) |
| Source Name<br>PotlatchDeltic Land & Lumber, LLC – Gwinn Lumber  |                  |                      |   |                                |
| Street Address<br>650 A. Avenue  |                  |                      |   |                                |
| City<br>Gwinn  | State<br>MI      | ZIP Code<br>49841    | County<br>Marquette                       |                                |
| Section/Town/Range (if address not available)  |                  |                      |   |                                |
| Source Description<br>Sawmill that processes primarily softwood, producing dimensional lumber products   |                  |                      |   |                                |
| <input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP. |                  |                      |   |                                |

#### OWNER INFORMATION

|  |                                |                   |                   |                   |
|--|--------------------------------|-------------------|-------------------|-------------------|
| Owner Name<br>PotlatchDeltic Corporation   | Section Number (if applicable) |                   |                   |                   |
| Mailing address (x check if same as source address)<br>601 West First Avenue, Suite 1600 |                                |                   |                   |                   |
| City<br>Spokane  | State<br>WA                    | ZIP Code<br>99201 | County<br>Spokane | Country<br>U.S.A. |

|   |
|---|
| <input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form. |
|---|

SRN: N5940

Section Number (if applicable):

**PART A: GENERAL INFORMATION (continued)**

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

**CONTACT INFORMATION**

|   |       |   |        |         |
|---|-------|---|--------|---------|
| Contact 1 Name<br>Amy Benson  |       | Title<br>Environmental Manager                  |        |         |
| Company Name & Mailing address (x check if same as source address)<br>X |       |   |        |         |
| City  | State | ZIP Code  | County | Country |
| Phone number<br>906-346-8205  |       | E-mail address<br>Amy.Benson@PotlatchDeltic.com |        |         |

|   |       |  |        |         |
|---|-------|--|--------|---------|
| Contact 2 Name (optional)<br>Tom Mosher                                 |       | Title<br>Environmental Director                    |        |         |
| Company Name & Mailing address (x check if same as source address)<br>X |       |  |        |         |
| City  | State | ZIP Code   | County | Country |
| Phone number<br>906-361-6187  |       | E-mail address<br>Thomas.Mosher@PotlatchDeltic.com |        |         |

**RESPONSIBLE OFFICIAL INFORMATION**

|  |       |  |        |         |
|--|-------|--|--------|---------|
| Responsible Official 1 Name<br>James Pearson                           |       | Title<br>Mill Manager                              |        |         |
| Company Name & Mailing address X check if same as source address)<br>X |       |  |        |         |
| City   | State | ZIP Code   | County | Country |
| Phone number<br>(906) 346-8212   |       | E-mail address<br>James.Pearson@PotlatchDeltic.com |        |         |

|  |       |                |        |         |
|--|-------|----------------|--------|---------|
| Responsible Official 2 Name (optional)   |       | Title          |        |         |
| Company Name & Mailing address ( <input type="checkbox"/> check if same as source address) |       |                |        |         |
| City   | State | ZIP Code       | County | Country |
| Phone number   |       | E-mail address |        |         |

Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

**PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official**

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

| Listing of ROP Application Contents. Check the box for the items included with your application.                                |   |
|---|---|
| <input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)                    | <input type="checkbox"/> Compliance Plan/Schedule of Compliance                         |
| <input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)         | <input type="checkbox"/> Stack information  |
| <input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required) | <input type="checkbox"/> Acid Rain Permit Initial/Renewal Application                   |
| <input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations                        | <input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information             |
| <input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)   | <input type="checkbox"/> Confidential Information                                       |
| <input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP        | <input checked="" type="checkbox"/> Paper copy of all documentation provided (required) |
| <input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan   | <input checked="" type="checkbox"/> Electronic documents provided (optional)            |
| <input checked="" type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)   | <input type="checkbox"/> Other, explain:  |

**Compliance Statement**

This source is in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. x Yes  No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. x Yes  No

This source will meet in a timely manner applicable requirements that become effective during the permit term. x Yes  No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

**Name and Title of the Responsible Official (Print or Type)**

James Pearson, Mill Manager

***As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.***



Signature of Responsible Official

12-12-23

Date

**PART C: SOURCE REQUIREMENT INFORMATION**

Answer the questions below for specific requirements or programs to which the source may be subject.

|   |  |
|---|--|
| C1. Actual emissions and associated data from <b>all</b> emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have <b>not</b> been reported in MAERS for the most recent emissions reporting year? If <b>Yes</b> , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68)<br>If <b>Yes</b> , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                  |
| C4. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO <sub>2</sub> , VOC, lead) emissions?<br>If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form.<br>If <b>No</b> , criteria pollutant potential emission calculations do not need to be included.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| C5. Has this stationary source <b>added or modified</b> equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act?<br>If <b>Yes</b> , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions <b>must</b> be included in HAP emission calculations.<br>If <b>No</b> , HAP potential emission calculations do not need to be included.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If <b>Yes</b> , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| C7. Are any emission units subject to the federal Acid Rain Program? If <b>Yes</b> , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.<br>Is an Acid Rain Permit Renewal Application included with this application?   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br><input type="checkbox"/> Yes <input type="checkbox"/> No                                  |
| C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)?<br>If <b>Yes</b> , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to EGLE, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy.<br>Is a CAM plan included with this application?<br>If a CAM Plan is included, check the type of proposed monitoring included in the Plan:<br>1. Monitoring proposed by the source based on performance of the control device, or<br>2. Presumptively Acceptable Monitoring, if eligible | x Yes <input type="checkbox"/> No<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br><input type="checkbox"/><br><input type="checkbox"/> |
| C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement?<br>If <b>Yes</b> , then a copy must be submitted as part of the ROP renewal application.   | x Yes <input type="checkbox"/> No  |
| C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable?<br>If <b>Yes</b> , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.   | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-CAM<br>x  |  |

**PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION**

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. x Yes  No

If No, go to Part E.

*Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).*

| Emission Unit ID | Emission Unit Description   | Rule 212(4) Citation<br>[e.g. Rule 212(4)(c)] | Rule 201 Exemption Rule Citation<br>[e.g. Rule 282(2)(b)(i)] |
|------------------|---|---|--|
| EUPARTSWASHERS   | Cold cleaners (parts washers) with air/vapor interface less than 10 ft2 also listed in G1 | 212(4)(b)                                     | 281(2)(h)  |
| EU-GASOLINETANK  | 500 gallon gasoline tank, vented to atmosphere  | 212(4)(c)                                     | 284(2)(g)  |
| EU-SAWFILE       | Sawfiling system with dust collector/filtration system                                    | 212(4)(d)                                     | 285(2)(l)(vi)  |
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Comments:

Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: AI-

**PART E: EXISTING ROP INFORMATION**

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

|  |  |
|--|--|
| <p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP?<br/>If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>  | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| <p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI?<br/>If <u>Yes</u>, complete Part F with the appropriate information.</p>   | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| <p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>   | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| <p>Comments:</p>   |  |
| <p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-</p>   |  |

**PART F: PERMIT TO INSTALL (PTI) INFORMATION**

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to all emission units with PTIs. Any PTI(s) identified below must be attached to the application.

| F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If <u>Yes</u> , complete the following table. <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span><br>If <u>No</u> , go to Part G.   |                                     |   |   |
|--|-------------------------------------|---|---|
| Permit to Install Number   | Emission Units/Flexible Group ID(s) | Description (Include Process Equipment, Control Devices and Monitoring Devices) | Date Emission Unit was Installed/ Modified/ Reconstructed |
|  |                                     |   |   |
|  |                                     |   |   |
|  |                                     |   |   |
|  |                                     |   |   |
| F2. Do any of the PTIs listed above change, add, or delete terms/conditions to <b>established emission units</b> in the existing ROP? If <u>Yes</u> , identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |                                     |   |   |
| F3. Do any of the PTIs listed above identify <b>new emission units</b> that need to be incorporated into the ROP? If <u>Yes</u> , submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |                                     |   |   |
| F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were <u>not</u> reported in MAERS for the most recent emissions reporting year? If <u>Yes</u> , identify the stack(s) that were not reported on the applicable MAERS form(s). <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |                                     |   |   |
| F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If <u>Yes</u> , describe the changes on an AI-001 Form. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |                                     |   |   |
| Comments:  |                                     |   |   |
| <input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: AI-  |                                     |   |   |



**PART H: REQUIREMENTS FOR ADDITION OR CHANGE**

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

|  |                                   |
|--|-----------------------------------|
| H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.  | X Yes <input type="checkbox"/> No |
| H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.   | X Yes <input type="checkbox"/> No |
| H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.  | X Yes <input type="checkbox"/> No |
| H4. Does the source propose to add new state or federal regulations to the existing ROP?<br>If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement. | <input type="checkbox"/> Yes x No |
| H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP.  | <input type="checkbox"/> Yes x No |
| H6. Does the source propose to add, change and/or delete <b>source-wide</b> requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  | <input type="checkbox"/> Yes x No |
| H7. Are you proposing to <b>streamline</b> any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.  | <input type="checkbox"/> Yes x No |

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

|  |  |
|--|--|
| <p>H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p> <p>FG-WOODBOILERS CO emission limit lb/MMBtu averaging time change to hourly to match the compliance method (stack test). Add notation that compliance with hourly emission limits is the average of three tests to clarify that single hour or single tests are not used for hourly emission limits.</p> | <p>X Yes <input type="checkbox"/> No</p> |
| <p>H9. Does the source propose to add, change and/or delete <b>material limit</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p> <p>Remove reference to 'instantaneous' to averaging time for the sulfur limit in diesel fuel for EUGENERATOR. Acceptable averaging times would include 'at all times' or 'every fuel shipment' to accurately reflect the compliance demonstration method.</p>   | <p>X Yes <input type="checkbox"/> No</p> |
| <p>H10. Does the source propose to add, change and/or delete <b>process/operational restriction</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>   | <p><input type="checkbox"/> Yes x No</p> |
| <p>H11. Does the source propose to add, change and/or delete <b>design/equipment parameter</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>  | <p><input type="checkbox"/> Yes x No</p> |
| <p>H12. Does the source propose to add, change and/or delete <b>testing/sampling</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p> <p>Add notation clarifying that the compliance demonstration for emission limits with hourly averaging times is the average of three tests.</p>  | <p>X Yes <input type="checkbox"/> No</p> |
| <p>H13. Does the source propose to add, change and/or delete <b>monitoring/recordkeeping</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>  | <p><input type="checkbox"/> Yes x No</p> |
| <p>H14. Does the source propose to add, change and/or delete <b>reporting</b> requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>   | <p><input type="checkbox"/> Yes x No</p> |

**PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)**

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H16. Does the source propose to add, change and/or delete any **other requirements**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below.  Yes  No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-CAM**  
x



**RENEWABLE OPERATING PERMIT APPLICATION  
AI-001: ADDITIONAL INFORMATION**

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

|            |                                 |
|------------|---------------------------------|
| SRN: N5940 | Section Number (if applicable): |
|------------|---------------------------------|

1. Additional Information ID  
**AI-CAM**

**Additional Information**

2. Is This Information Confidential?  Yes  No

**The Planer System (FGPLANERSYSTEM), controlled by a baghouse, is subject to CAM for PM.**

**There have been no changes to the CAM plan which has previously been submitted to AQD. Therefore, a copy of the CAM plan is not included.**

**We are also requesting an administrative change that converts the flexible group FG-PLANERSYSTEM to an emission unit for the finishing air handling system controlled by a baghouse. The changes do not reflect any change in equipment or operation or emission limits. The changes in on line reporting through MAERS is not allowing for reporting for flexible groups. Emissions from this operation all exhaust through a single stack with a single emission calculation. It does not make sense to report 'split' emissions from this system. Therefore, we propose to 'convert' the description from a flexible group to an emission unit.**

**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                    | R 336.1205(1)                      |
| 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                    | R 336.1205(1)                      |

#### 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<br>(Including Process Equipment & Control Device(s))  | Installation Date/<br>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-PLANERSYSTEM           | <u>Air handling system and associated baghouse on <del>post-kiln lumber</del> dimensions finishing operations on post-kiln lumber and associated baghouse.</u>  | 1997 / NA                               | <del>FG</del> EU-PLANERSYSTEM |
| <del>EU-ENDTRIMMER1</del> | <del>Size reduction green lumber saw and associated baghouse.</del>   | <del>1997 / NA</del>                    | <del>FG-PLANERSYSTEM</del>    |
| <del>EU-ENDTRIMMER2</del> | <del>Size reduction dry lumber saw and associated baghouse.</del>   | <del>1997 / 2013</del>                  | <del>FG-PLANERSYSTEM</del>    |
| <del>EU-ENDTRIMMER3</del> | <del>Size reduction green lumber saw and associated baghouse.</del>   | <del>1997 / NA</del>                    | <del>FG-PLANERSYSTEM</del>    |
| <del>EU-TRAILERS</del>    | <del>Holding and transport of wood shavings.</del>  | <del>1997 / NA</del>                    | <del>FG-PLANERSYSTEM</del>    |
| 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<br/>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<br>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 | <del>Instantaneous</del> At all times | EUGENERATOR | SC VI.3                    | 40 CFR 60.4207(b)<br>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<br>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<br>EU-DRYKILN2<br>EU-DRYKILN3<br>EU-DRYKILN4                                      |
| <del>FG-PLANERSYSTEM</del> | <del>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.</del>        | <del>EU-PLANER<br/>EU-ENDTRIMMER1<br/>EU-ENDTRIMMER2<br/>EU-ENDTRIMMER3<br/>EU-TRAILERS</del> |
| FG-FIREPUMPS               | Two 231 HP compression ignition emergency fire pump engines.   | EU-FIREPUMP1<br>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/<br>Operating<br>Scenario   | Equipment                      | Monitoring/<br>Testing<br>Method | Underlying<br>Applicable<br>Requirements |
|-------------------|---|---|--------------------------------|----------------------------------|--|
| 1. Benzo(a)pyrene | 9.7 micrograms per cubic meter <sup>1</sup>   | Hourly  | EUWOODBOILER1<br>EUWOODBOILER2 | SC V.1                           | <b>R 336.1225</b>                        |
| 2. Benzo(a)pyrene | 0.0006 pounds per hour <sup>1</sup>           | Hourly  | EUWOODBOILER1<br>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<br>EUWOODBOILER2 | SC VI.3                          | <b>R 336.1225</b>                        |
| 4. CO             | 0.50 pounds per MMBTU heat input <sup>2</sup> | <del>8-hour</del><br>averageHourly  | EUWOODBOILER1<br>EUWOODBOILER2 | SC V.1                           | <b>R 336.1205(1)</b>                     |
| 5. CO             | 14.35 pph <sup>2</sup>                        | Hourly  | EUWOODBOILER1<br>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<br>EUWOODBOILER2 | SC VI.3                          | <b>R 336.1205(1)</b>                     |
| 7. PM             | 0.20 pounds per MMBTU heat input <sup>2</sup> | Hourly  | EUWOODBOILER1<br>EUWOODBOILER2 | SC V.1                           | <b>R 336.1331(1)(c)</b>                  |
| 8. PM             | 5.7 pph <sup>2</sup>                          | Hourly  | EUWOODBOILER1<br>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<br>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:

| <b>Pollutant</b> | <b>Test Method Reference</b>   |
|------------------|--|
| PM               | <a href="#">Method 5</a> , 40 CFR Part 60, Appendix <a href="#">AA-1</a> ; and Part 10 of the Michigan Air Pollution Control Rules ( <a href="#">Rule 1004(1)(i)</a> ) |
| CO               | 40 CFR Part 60, Appendix A <a href="#">and Part 10 of the Michigan Air Pollution Control Rules</a> ( <a href="#">Rule 1004(1)(n)</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. **Compliance is demonstrated by the average of three tests.** **(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<br/>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<br/>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)**

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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/<br>Operating<br>Scenario   | Equipment   | Testing /<br>Monitoring<br>Method | Underlying Applicable<br>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)<br>R 336.1225<br>R 336.1702(a) |

**II. MATERIAL LIMIT(S)**

| Material    | Limit  | Time Period/<br>Operating<br>Scenario  | Equipment   | Monitoring/<br>Testing<br>Method | Underlying Applicable<br>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)<br>R 336.1225<br>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)<br>R 336.1225<br>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-de minimus](#) 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. Emissions are collected in a single air handling system that is controlled by a baghouse.

**Emission Units:** EU-PLANERSYSTEM, ~~EU-ENDTRIMMER1, EU-ENDTRIMMER2, EU-ENDTRIMMER3, EU-TRAILERS~~

**POLLUTION CONTROL EQUIPMENT**

Baghouse

**I. EMISSION LIMIT(S)**

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

**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).

**FG-FIREPUMPS  
FLEXIBLE GROUP CONDITIONS**

**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/<br>department | Michigan Department of Environment,<br>Great Lakes, and Energy | gr                                    | Grains  |
| EGLE                      | Michigan Department of Environment,<br>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                       | Malfunaction 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<br>microns in diameter  |
| NESHAP                    | National Emission Standard for Hazardous<br>Air Pollutants     | PM2.5                                 | Particulate Matter equal to or less than 2.5<br>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<br>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<br>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<br>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<br>FG-DRYKILNS<br>FG-PLANERSYSTEM<br>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.



## Wood Products Gwinn Lumber

- 1. Title**                    **425 – Fugitive Dust**
- 2. Scope**                    This SOP applies to the EU-PNEUMATICLINE, combination chain, and/or mechanical belt conveyor system from the chip screen and chip handling system to ensure such equipment is regularly inspected and maintained and to outline the proper procedure in the event of a malfunction.
- 3. Objective**                To minimize fugitive dust emissions from EU-PNEUMATICLINE, combination chain and/or mechanical belt conveyor system from the chip screen and chip handling system.
- 4. Definitions**              EGLE – Environmental, Great Lakes & Energy – State of Michigan  
BMP – Best Management Practice  
PM – Preventative Maintenance  
EU - Emission Unit
- 5. Safety**                    None
- 6. Lead Responsibility**        Environmental Manager

### 7. General Requirements

- 7.1. Paved areas around chip pile, truck bin and rail car loading equipment shall be swept/scraped on a regular basis and documented on Form #514A (Yard BMP Monthly Checklist). Completed checklists will be filed under AIR 0002.
- 7.2. If at any time an employee observes any abnormal emissions from the EU-PNEUMATICLINE, combination chain and/or mechanical belt conveyor system from the chip screen, or chip handling system, they shall notify their Supervisor or Environmental Manager immediately.
  - 7.2.1. Supervisor shall shut down equipment immediately and notify the Environmental Manager and Maintenance Superintendent.
- 7.3. Equipment will not be operated until repairs are made and equipment functions as designed.

### 8. Procedure

- 8.1. The shavings truck driver shall observe chip cyclone and chip piping daily to check for visible emissions and leaks per SOP #413 (Cyclone Daily Inspection).
  - 8.1.1. If emissions or leaks are noted, notify Supervisor or Environmental Manager immediately.
  - 8.1.2. Observations shall be recorded on form #412A – Daily Baghouse/Cyclone Inspection.
    - 8.1.2.1. Completed form to be filed under AIR 0001.
- 8.2. Maintenance Superintendent is responsible for having the cyclone inspected annually (per SOP #413) for:

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**Wood Products  
Gwinn Lumber**

8.2.1. Internal parts wear or buildup of material;

8.2.1.1. Clean and repair as necessary.

8.2.2. Record findings on Cyclone Annual PM Sheet Form #413B. Completed form to be filed under AIR 0015.

8.3. Log Yard Lead is responsible for completing and documenting yard BMPs listed using Form #514A - Yard Environmental BMP Monthly Checklist. Completed form to be filed under AIR 0002.

8.4. All records will be retained for at least five years and made available to EGLE upon request.

**9. Attachments** Form #514A (Yard Environmental BMP Checklist)

**10. Revision Number** 12

**11. Change Summary** Checklist 3/20/18- Updated Ownership 11/1/18- Remove Conveyor as Emission Unit (EU) 3/26/20 – Updated mill manager, department name and plan to reflect current ROP. 6/22/23 – Updated Environmental title and minor grammar changes. 12/12/23 – Deleted general condition 7.1

**12. Office of Record:** Gwinn Environmental

|                               |                                      |                                   |                                   |
|-------------------------------|--------------------------------------|-----------------------------------|-----------------------------------|
| <b>Owner:</b><br>Amy Kuivanen | <b>Approved By:</b><br>James Pearson | <b>Effective Date:</b><br>6/18/02 | <b>Revision Date:</b><br>12/12/23 |
|-------------------------------|--------------------------------------|-----------------------------------|-----------------------------------|

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# Malfunction Abatement Plan

## PotlatchDeltic – Gwinn Lumber

November, 2023

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### Introduction

This malfunction abatement plan (MAP) has been prepared as required by the PotlatchDeltic - Gwinn Lumber Renewable Operating Permit (ROP) Number MI-ROP-N5940-20XX. Source-wide Condition B IX. 1 of the ROP states

*“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)”.*

PotlatchDeltic - Gwinn Lumber prepares and maintains a preventive maintenance program for the pollution control devices installed on the mill’s process equipment. Preventative maintenance schedules and procedures have been established for the process and pollution control equipment based on the manufacturer’s recommendations, ROP requirements, emissions testing, and mill operational experience. Qualified and properly trained personnel perform equipment operations, inspections, preventive maintenance, and repairs. All equipment used to control air emissions is operated and maintained to the extent possible to prevent malfunctions or failures that would result in emissions exceeding applicable emission limits. Standard operating procedures are also in place to detect and respond to malfunctions if they do occur to minimize potential impacts. The PotlatchDeltic - Gwinn Lumber MAP consistently aligns with the required elements specified in paragraph 2 of R 336.1911 (Rule 911).

### Source Description

Green logs are rough cut into lumber in an automated sawmill and dried in one of four dry kilns; three are indirectly heated steam kilns, and one is a direct-fired natural gas kiln. Permit conditions cap kiln-dried lumber production at the Gwinn Facility at 220 million board feet per year (MMBf/yr). The mill processes jack pine, red pine, balsam, spruce, and insignificant amounts of white pine and tamarack. Wood chips, sawdust, and wood waste are sold or burned in the wood-fired boilers. The emissions unit below describes the emission sources covered under the ROP, the associated air pollution control equipment, and affected emissions.

- **EU-WOODBOILER1 and EU-WOODBOILER2** are identical wood-fired boilers rated at 28.7 MMBTU per hour each. These emission units have been combined into a flexible group (**FG-WOODBOILERS**) in the ROP. They are subject to the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR 60, Subparts A and Dc. These sources are also subject to the Maximum Achievable Control Technology (MACT) Standards under the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subparts

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A and JJJJJ. Each boiler is equipped with a primary and secondary multi-clone for control of particulate matter. These emission units do not have pre-control device emissions of particulate matter greater than the major source threshold level. Therefore, they are not subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR 64.

- **EU-PLANERSYSTEM** is an air handling system and associated baghouse for dimension finishing operations on post-kiln lumber. The planer system has pre-control device emissions of particulate matter greater than the major source threshold level and is subject to the federal CAM rule.
- **EU-PNEUMATICLINE** is a pneumatic chip/air separator that conveys wood chips to pile storage, rail car load-out, or a truck bin. Chips blown to the truck bin are separated from the air stream and collected by a cyclone prior to entering the bin. The cyclone functions as a collector for the pneumatically conveyed chips and is considered inherent process equipment. As such, it is not subject to the federal CAM rule. However, the cyclone is managed as a control device in this plan.
- **EU-GASBOILER** is a natural gas-fired boiler rated at 800 horsepower with a heat input capacity of 48.8 MMBTU per hour. This emissions unit is subject to the NSPS for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR 60, Subparts A and Dc. There are no air emission control devices on the gas-fired boiler.
- **EU-GENERATOR** is a 200-kilowatt diesel-fueled emergency generator. This emission unit is subject to the NSPS for Compression Ignition Internal Combustion Engines promulgated in 40 CFR 60, Subparts A and IIII. There are no air emission control devices on the diesel emergency generator.
- **EU-DRYKILN1, EU-DRYKILN2, EU-DRYKILN3** are three indirect steam heated kilns and **EU-DRYKILN4** is a direct-fired natural gas kiln. All four kilns are used for drying rough-cut softwood lumber. These emission units have been combined into a flexible group in the ROP (**FG-DRYKILNS**). There are no air emission control devices on the kilns.
- **EU-FIREPUMP1 and EU-FIREPUMP2** are two 231-horsepower compression ignition emergency diesel fire pump engines. These emission units have been combined into a flexible group in the ROP (**FG-FIREPUMPS**). They are subject to the MACT Standards for Stationary Reciprocating Internal Combustion Engines Area Sources, 40 CFR 63, Subparts A and ZZZZ. There are no air emission control devices on the diesel fire pump engines.

## **Preventive Maintenance Program**

# **Malfunction Abatement Plan**

## **PotlatchDeltic – Gwinn Lumber**

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*Rule 911. (2) A malfunction abatement plan required by subrule (1) of this rule shall be in writing and shall, at a minimum, specify all of the following:*

*(a) A complete preventative maintenance program, including identification of the supervisory personnel responsible for overseeing the inspection, maintenance, and repair of air-cleaning devices, a description of the items or conditions that shall be inspected, the frequency of the inspections or repairs, and an identification of the major replacement parts that shall be maintained in inventory for quick replacement.*

The preventive maintenance program for the pollution control devices is based on the manufacturer's recommendations and previous plant experience. Program responsibilities have been defined, schedules have been established, and critical spare parts have been inventoried for all routine inspection and maintenance activities. Inspections, preventive maintenance, and repairs are done by trained and qualified individuals.

- **Responsible Personnel**

The responsible personnel for the preventive maintenance program at Gwinn Lumber are as follows:

| <b>Role/Position</b>          | <b>Responsibility</b>  |
|-------------------------------|--|
| Plant Manager                 | Overall facility operations and maintenance. ROP Responsible Official.   |
| Production Supervisors        | Operator training, record review, malfunction response, and corrective action follow-up                        |
| Maintenance Planner/Scheduler | Preventive maintenance work order planning, scheduling, and record generation                                  |
| Boiler Operators              | Malfunction detection, response, corrective action initiation, routine daily inspections and record generation |
| Pneumatic Line Operators      | Malfunction detection, response, corrective action initiation, routine daily inspections and record generation |
| Millwrights/Electricians      | Preventive maintenance inspections, repairs, corrective actions, routine inspections and record generation     |
| Environmental Manager         | ROP compliance, plan maintenance, documentation, reporting and recordkeeping                                   |

# Malfunction Abatement Plan

## PotlatchDeltic – Gwinn Lumber

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- **Equipment Inspections**

The preventive maintenance program includes scheduled routine run-time and downtime equipment inspections. Run-time inspections typically occur on a daily or monthly basis and require that the process is in operation to assess the equipment's condition. Down-time inspections are conducted less frequently and require the process to be shut down and de-energized so that internal components can be checked. The frequency and scope of these inspections are based on manufacturer recommendations and operational experience. A summary of equipment inspections is provided in Table 1 below.

**Table 1**

| <b>Pollution Control Device Inspection Summary</b> |                       |   |                  |
|--|-----------------------|---|------------------|
| <b>Emission Unit</b>                               | <b>Control Device</b> | <b>Items/Conditions Inspected</b>   | <b>Frequency</b> |
| FG-WOODBOILERS                                     | Multiclones           | Leaks, hot spots, general condition (Record on Form #415A)<br>Pressure drop (Record on Form #414C)  | Daily            |
|  |                       | Wear/erosion on outlet tubes, tube sheets, gaskets/connectors, collector boots, and airlock tips  | Annual           |
|  |                       | Magnehelic gauge calibration/replacement  | Annual           |
| EU-PLANERSYSTEM                                    | Baghouse              | The operation, pressure drop, visible emissions, pulse pressure, and compressor intake filter (Record on Form #412A)                        | Daily            |
|  |                       | Wear/leaks, solenoid/diaphragm valve, door seals, rotary arm components, inlet/outlet ductwork (Record on "Planer Machine Equipment PM's.") | Monthly          |
|  |                       | Magnehelic gauge calibration/replacement  | Semi-Annual      |
| EU-PNEUMATICLINE                                   | Truck Bin Cyclone     | Visible Emissions, blow line leaks (Record on Form #412A)   | Daily            |
|  |                       | Wear, material build-up   | Annual           |

- **Critical Spares**

A listing of major critical spare parts maintained at the facility is provided in Appendix A. The identified major critical spare parts are placed on order within 30 days of use.

# **Malfunction Abatement Plan**

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### **Monitored Operating Variables**

*Rule 911. (2)*

*(b) An identification of the source and air-cleaning device operating variables that shall be monitored to detect a malfunction or failure, the normal operating range of these variables, and a description of the method of monitoring or surveillance procedures.*

The planer has pre-control device particulate matter emissions greater than the major source threshold level. As such, these emission units are subject to the federal CAM rule. A CAM Plan has been developed and is maintained for these sources in a separate document. A summary of the monitoring requirements for the CAM subject sources is included in Table 2 below, along with monitoring conducted for the Truck Bin Cyclone and Multiclones.

**Table 2**

| <b>Pollution Control Device Monitoring Summary</b> |                       |  |                               |   |
|--|-----------------------|--|-------------------------------|---|
| <b>Emission Unit</b>                               | <b>Control Device</b> | <b>Monitored Operating Variable</b>      | <b>Normal Operating Range</b> | <b>Monitoring Method</b>  |
| FG-WOODBOILERS                                     | Multiclones           | Differential pressure across multiclones | -5.0" to +5.0" w.g.           | Daily magnehelic gauge reading when in operation                      |
| EU-PLANERSYSTEM                                    | Baghouse              | Differential pressure across baghouse    | +0.1" to +6.0" w.g.           | Daily magnehelic gauge reading when in operation                      |
|  |                       | Visible emissions                        | No visible emissions          | Daily inspection when in operation and monthly Method 22 Observations |
| EU-PNEUMATICLINE                                   | Truck Bin Cyclone     | Visible emissions                        | No visible emissions          | Daily non-certified visible emissions observation when in operation   |

### **Corrective Action Procedures**

*Rule 911. (2)*

*(c) A description of the corrective procedures or operational changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits.*

If a malfunction occurs on a pollution control device that causes the mill to exceed a permitted emission limit potentially, specific actions will be undertaken including process equipment shutdown as necessary

# **Malfunction Abatement Plan**

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to minimize the duration and impact of the malfunction and restore compliance as quickly as possible. Whenever warranted and reasonable, overtime, off-shift labor, outside consultants or contractors will be used to correct the malfunction. These actions are detailed in the mill’s standard operating procedures. A summary of the corrective action procedures are provided in Table 3 below.

**Table 3**

| <b>Pollution Control Device Corrective Action Summary</b> |                       |   |   |
|---|-----------------------|---|---|
| <b>Emission Unit</b>                                      | <b>Control Device</b> | <b>Malfunction</b>                                    | <b>Corrective Action</b>  |
| FG-WOODBOILERS  | Multiclones           | Pressure drop out of range                            | Isolate/shut down affected boiler, inspect for wear and/or plugging, repair as needed   |
|   |                       | Visible leaks, hot spots                              | Isolate/shut down affected boiler, inspect for wear, repair as needed   |
| EU-PLANERSYSTEM   | Baghouse              | Pressure drop low                                     | Inspect for leaks or malfunction of magnehelic gauge. Shut down process and replace bags as needed.                                   |
|   |                       | Pressure drop high                                    | Initiate manual cleaning cycles, inspect magnehelic gauge for potential malfunctions. Shut down process and replace bags as necessary |
|   |                       | Visible emissions                                     | Inspect internals for leaks/damage. Shut down process and repair/replace as needed  |
| EU-PNEUMATICLINE  | Truck Bin Cyclone     | Visible fugitive emissions from cyclone or blow lines | Isolate/shut down affected blow line and repair as needed   |

### **Recordkeeping**

All inspections, preventive maintenance, and corrective actions described in the plan are documented on inspection checklists and completed work orders. Records are maintained by the Environmental Coordinator as required by the ROP.

### **Abnormal Condition/Malfunction Reporting**

The Marquette AQD District Office will be notified of abnormal conditions or malfunctions that result in excess emissions of a Hazardous Air Pollutant lasting more than 1 hour or any other air contaminant lasting more than 2 hours no later than 2 business days after discovery. Notification will be made by e-mail, telephone, or direct communication. Written reports will also be submitted to the AQD District Supervisor if the abnormal condition or malfunction lasts longer than 2 hours. The written report will be submitted within 10 days after the abnormal conditions or malfunction has been corrected, but no later than 30 days after discovery. The written reports shall include all of the information required in Rule 912(5) and will be certified by the mill’s Responsible Official. Abnormal conditions and malfunctions resulting in excess emission exceeding the limits established in the ROP are deviations. They will also be reported in the semiannual deviation reports required by Rule 213(3)(c)(i).

# **Malfunction Abatement Plan**

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Abnormal conditions or malfunctions which result in excess emissions less than the 1 and 2-hour durations described above do not require AQD notification. These events will, however, be reported in the semiannual deviation reports required by Rule 213(3)(c)(i).

# **Malfunction Abatement Plan**

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## **Appendix A**

### Critical Spares Inventory

# **Malfunction Abatement Plan**

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### **Boiler Multiclone and Ash System Critical Spares**

| <b>Description</b>                              | <b>Spare Qty</b> |
|---|------------------|
| Differential Pressure Gauge                     | 4                |
| Connection Pipe for Differential Pressure Gauge | 4                |
| Boiler Ash Airlock                              | 1                |
| Boiler Multiclone Tube                          | 6                |
| Eductor, Boiler Ash System                      | 1                |
| Check Valve for Ash System                      | 1                |
| Relief Valve for Spare Ash Blower Unit          | 1                |
| Discharge Silencer Ash System                   | 1                |
| Vent Fan for Ash System                         | 1                |
| V-Belt Drive Ash System                         | 1                |
| Air Nozzle for Ash System                       | 1                |
| Diaphragm Kit for Ash System                    | 5                |
| Solenoid Valve for Ash Bin Vent                 | 4                |
| Ash System Filter Bags                          | 9                |
| Ash System Rotary Blower                        | 1                |
| Bin Vent Filter Bag Cages                       | 9                |
| Magnehelic Guage for Bin Vent                   | 2                |

### **Planer Baghouse Critical Spares**

| <b>Description</b>                        | <b>Spare Qty</b> |
|---|------------------|
| Baghouse Filter Bags                      | 484              |
| Grecon Electrical Panel                   | 1                |
| Grecon Spray Nozzles                      | 3                |
| Battery Back-Up for Grecon system         | 3                |
| Light Sensor Cord for Grecon system       | 3                |
| Flow Sensor for Grecon System             | 1                |
| Pressure Sensor for Grecon System         | 3                |
| Electrical Junction Box for Grecon System | 1                |
| Electrical Valve for Grecon System        | 1                |
| Coil Valve for Grecon System              | 2                |
| Water Filter Strainer for Grecon System   | 6                |
| Magnet for Abort Gate                     | 1                |
| Coil Valve 12VDC for Grecon System        | 3                |
| Baghouse Filter Bag Cages                 | 474              |