West Virginia Department of Environmental Protection

Earl Ray Tomblin **Division of Air Quality** 

Governor

Randy C. Huffman Cabinet Secretary

# Permit to Modify



## R13-1761I

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

> Issued to: Weyerhaeuser NR Company Sutton OSB Mill 007-00016

> > William F. Durham Director

> > > Issued: **DRAFT**

This permit will supercede and replace Permit R13-1761G issued on March 12, 2009.

| Facility Location:    | Heaters, Braxton County, West Virginia   |
|-----------------------|--|
| Mailing Address:      | 3601 Gauley Pike, Heaters, WV 26627  |
| Facility Description: | Orientated Strand Board (OSB) Manufacturer   |
| SIC/NAICS Codes:      | 2493/321219  |
| UTM Coordinates:      | 529.939 km Easting • 4,290.213 km Northing • Zone 17   |
| Latitude/Longitude:   | 38.76245/-80.65324   |
| Permit Type:          | Modification   |
| Description of Mod.:  | Replacement of the Regenerative Catalytic Oxidizers (RCOs) with a biological oxidation scrubber      |
|                       | (Biofilter). Additionally, potential emissions from various emission units at the facility have been |
|                       | recalculated using updated emission factors and assumptions.   |

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. The permittee has the duty to update the facility's Title V (45CSR30) permit to reflect the changes permitted herein.

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## **1.0** Emission Units<sup>(1)</sup>

| Emission<br>Unit ID      | Emission<br>Point ID | Emission Unit Description         | Control<br>Device ID(s)                              | Control Device  |
|--------------------------|----------------------|-----------------------------------|--|---|
| 1 S                      | 1                    | Flaking and Screening System      | 4313-00-10   | Fabric Filter   |
| 38                       | 3                    | Dry Flake Area                    | 4333-00-10   | Fabric Filter   |
| 4S                       | 4                    | Mat Trim System                   | 4345-00-10   | Fabric Filter   |
| 58                       | 5                    | Rough Trim System                 | 4353-00-10   | Fabric Filter   |
| 6S                       | 6                    | Tongue & Groove and Sawing System | 4363-00-10   | Fabric Filter   |
| 7S                       | 7                    | Sander Dust System                | 4374-00-10   | Fabric Filter   |
| 9S                       | 9                    | Dry Waste System                  | 4397-00-10   | Fabric Filter   |
| 3800-00-10<br>3816-00-11 | 10<br>21<br>23       | Energy Cell No. 1 <sup>(2)</sup>  | 3820-00-10<br>4110-00-10<br>4440-00-10<br>4460-00-10 | Multiclone,<br>Wet ESP No. 1,<br>RCO No. 1<br>RCO No. 2<br>Biofilter    |
| 3900-00-10<br>3916-00-11 | 11<br>21<br>23       | Energy Cell No. 2 <sup>(2)</sup>  | 3920-00-10<br>4120-00-10<br>4440-00-10<br>4460-00-10 | Multiclone,<br>Wet ESP No. 2,<br>RCO No. 1<br>RCO No. 2<br>Biofilter    |
| 3130-00-11               | 21<br>23             | Dryer No. 1                       | 4110-00-10   | Wet ESP No. 1   |
| 3230-00-11               | 21<br>23             | Dryer No. 2                       | 4440-00-10<br>4460-00-10                             | RCO No. 1<br>Biofilter  |
| 3330-00-11               | 21<br>23             | Dryer No. 3                       | 4120-00-10   | Wet ESP No. 2   |
| 3430-00-11               | 21<br>23             | Dryer No. 4                       | 4440-00-10<br>4460-00-10                             | RCO No. 2<br>Biofilter  |
| 4700-00-10               | 21<br>23<br>24       | OSB Press                         | 4110-00-10<br>4120-00-10<br>4440-00-10<br>4460-00-10 | Wet ESP No. 1,<br>Wet ESP No. 2,<br>RCO No. 1<br>RCO No. 2<br>Biofilter |
| 27S                      | 27                   | Emergency Diesel Generator        | N/A  | None  |
| 31S                      | 31                   | Liquid Phenolic Resin Tank #1     | N/A  | None  |
| 328                      | 32                   | Liquid Phenolic Resin Tank #2     | N/A  | None  |

| Emission<br>Unit ID | Emission<br>Point ID | Emission Unit Description     | Control<br>Device ID(s) | Control Device |
|---------------------|----------------------|-------------------------------|-------------------------|----------------|
| 338                 | 33                   | Liquid Phenolic Resin Tank #3 | N/A                     | None           |
| 348                 | 34                   | Liquid Phenolic Resin Tank #4 | N/A                     | None           |
| 358                 | 35                   | MDI Tank #1                   | N/A                     | None           |
| 368                 | 36                   | MDI Tank #2                   | N/A                     | None           |
| 378                 | 37                   | Wax Tank #1                   | N/A                     | None           |
| 388                 | 38                   | Wax Tank #2                   | N/A                     | None           |
| 40S/41S             | 40/41                | Paint Booth No.1              | N/A                     | Filters        |
| 428/43S             | 42/43                | Paint Booth No.2              | N/A                     | Filters        |
| 448/45S             | 44/45                | Paint Booth No.3              | N/A                     | Filters        |
| 46S                 | 46                   | Liquid Phenolic Resin Tank #5 | N/A                     | None           |
| 47S                 | 47                   | Liquid Phenolic Resin Tank #6 | N/A                     | None           |

## **1.0** Emission Units<sup>(1)</sup>

(1) ESP = Electrostatic Precipitator; RCO = Regenerative Catalytic Oxidizer

(2) Energy Cells are authorized to operate in the following scenarios: During "normal operations," gases will be vented through Wet ESPs and RCO or Biofilter and out Emission Point 21 or 23, respectively. During RCDME, gases will be vented through Wet ESPs and out Emission Point 21. During "Idle Run Condition," gases will be vented through Multiclones and out Emission Points 10 and 11. During "Energy Cell Only Mode," gases will be vented through Wet ESPs and out Emission Point 21.

## 2.0. General Conditions

## 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

## 2.2. Acronyms

| СААА            | Clean Air Act Amendments          | NSPS              | New Source Performance             |
|-----------------|-----------------------------------|-------------------|------------------------------------|
| CBI             | Confidential Business Information |                   | Standards                          |
| CEM             | Continuous Emission Monitor       | PM                | Particulate Matter                 |
| CES             | Certified Emission Statement      | PM <sub>2.5</sub> | Particulate Matter less than 2.5µm |
| C.F.R. or CFR   | Code of Federal Regulations       |                   | in diameter                        |
| CO              | Carbon Monoxide                   | $PM_{10}$         | Particulate Matter less than 10µm  |
| C.S.R. or CSR   | Codes of State Rules              |                   | in diameter                        |
| DAQ             | Division of Air Quality           | Ppb               | Pounds per Batch                   |
| DEP             | Department of Environmental       | pph               | Pounds per Hour                    |
|                 | Protection                        | ррт               | Parts per Million                  |
| dscm            | Dry Standard Cubic Meter          | Ppmv or           | Parts per million by               |
| FOIA            | Freedom of Information Act        | ppmv              | volume                             |
| НАР             | Hazardous Air Pollutant           | PSD               | Prevention of Significant          |
| HON             | Hazardous Organic NESHAP          |                   | Deterioration                      |
| HP              | Horsepower                        | psi               | Pounds per Square Inch             |
| lbs/hr          | Pounds per Hour                   | PTE               | Potential to Emit                  |
| LDAR            | Leak Detection and Repair         | SIC               | Standard Industrial Classification |
| Μ               | Thousand                          | SIP               | State Implementation Plan          |
| MACT            | Maximum Achievable Control        | $SO_2$            | Sulfur Dioxide                     |
|                 | Technology                        | TAP               | Toxic Air Pollutant                |
| MDHI            | Maximum Design Heat Input         | TPY               | Tons per Year                      |
| MM              | Million                           | TRS               | Total Reduced Sulfur               |
| MMBtu/hr or     | Million British Thermal Units     | TSP               | Total Suspended Particulate        |
| mmbtu/hr        | per Hour                          | USEPA             | United States Environmental        |
| MMCF/hr or      | Million Cubic Feet per Hour       |                   | Protection Agency                  |
| mmcf/hr         |                                   | UTM               | Universal Transverse Mercator      |
| NA              | Not Applicable                    | VEE               | Visual Emissions Evaluation        |
| NAAQS           | National Ambient Air Quality      | VOC               | Volatile Organic Compounds         |
|                 | Standards                         | VOL               | Volatile Organic Liquids           |
| NESHAPS         | National Emissions Standards for  |                   |                                    |
|                 | Hazardous Air Pollutants          |                   |                                    |
| NO <sub>x</sub> | Nitrogen Oxides                   |                   |                                    |

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## 2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

2.3.1. 45CSR13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;

## 2.4. Term and Renewal

2.4.1. This permit supercedes and replaces previously issued Permit R13-1761G. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

## 2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the applicable plans and specifications filed in Permit Application R13-1761 through R13-1761I and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; [45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

## 2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

## 2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

## 2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13. [45CSR§13-4]

## 2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

## 2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate. [45CSR\$13-5.1]

## 2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## 2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
  - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

#### 2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

### 2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

## 2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

## 2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

### 2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. **[45CSR§13-10.1]** 

## 2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

## 2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

## 3.0. Facility-Wide Requirements

## 3.1. Limitations and Standards

- 3.1.1. Open burning. The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
   [45CSR§6-3.1.]
- 3.1.2. Open burning exemptions. The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. Asbestos. The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health Environmental Health require a copy of this notice to be sent to them.
  [40CFR§61.145(b) and 45CSR§15]
- 3.1.4. Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
   [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. Permanent shutdown. A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
  [45CSR§13-10.5.]
- 3.1.6. Standby plan for reducing emissions. When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
   [45CSR§11-5.2.]

#### **3.2.** Monitoring Requirements

[Reserved]

## 3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may

at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
   [WV Code § 22-5-4(a)(15)]

## 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. Odors. For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
   [45CSR§4. State-Enforceable only.]

## 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

| If to the DAQ:            | If to the USEPA:                         |
|---------------------------|--|
| Director                  | Associate Director                       |
| WVDEP                     | Office of Air Enforcement and Compliance |
| Division of Air Quality   | Assistance                               |
| 601 57th Street, SE       | (3AP20)                                  |
| Charleston, WV 25304-2345 | U. S. Environmental Protection Agency    |
|                           | Region III                               |
|                           | 1650 Arch Street                         |
|                           | Philadelphia, PA 19103-2029              |

#### 3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR30 Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.
- 3.5.6. Semi-annual monitoring reports. The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

## 4.0. Source-Specific Requirements

## 4.1. Limitations and Standards

4.1.1. The permittee shall operate the following particulate matter control devices and said control devices shall be designed to achieve the removal efficiencies as listed:

| Particulate Sources                           | Control Device<br>Description and ID No. | Removal<br>Efficiency |
|---|--|-----------------------|
| Flaking and Screening Dust Control            | Baghouse (4313-00-10)                    | 99.9                  |
| Dry Dust Control System                       | Baghouse (4333-00-10)                    | 99.9                  |
| Mat Trim System                               | Baghouse (4345-00-10)                    | 99.9                  |
| Rough Trim System                             | Baghouse (4353-00-10)                    | 99.9                  |
| T & G and Finish Saws System                  | Baghouse (4363-00-10)                    | 99.9                  |
| Sander Dust System                            | Baghouse (4374-00-10)                    | 99.9                  |
| Dry Waste Relay System                        | Baghouse (4397-00-10)                    | 99.9                  |
| 30 MMBTU/hr Energy Cell (3800-00-10) Idle Run | Multi-Clone (3820-00-10)                 | 80.0                  |
| 30 MMBTU Energy Cell (3900-00-10) Idle Run    | Multi-Clone (3920-00-10)                 | 80.0                  |
| 175 MMBTU/hr Energy Cell (3800-00-10)         | WESP (4110-00-10)                        | 80.0                  |
| 175 MMBTU/hr Energy Cell (3900-00-10)         | WESP (4120-00-10)                        | 80.0                  |

#### Table 4.1.1.: Particulate Matter Control Device Removal Efficiencies

4.1.2. Emissions to the air from the permitted facility shall not exceed the following:

|                   |                                      |                               |                         | Emission Limit  |                 |
|-------------------|--------------------------------------|-------------------------------|-------------------------|-----------------|-----------------|
| Emission<br>Point | Source                               | <b>Control Device</b>         | Pollutant               | Hourly<br>(pph) | Annual<br>(tpy) |
| 1                 | Flaking and Screening<br>System      | Fabric Filter<br>(4313-00-10) | PM <sub>10</sub><br>VOC | 0.59<br>0.01    | 2.58<br>0.05    |
| 3                 | Dry Flake Area                       | Fabric Filter<br>(4333-00-10) | PM <sub>10</sub><br>VOC | 0.48<br>0.82    | 2.11<br>3.57    |
| 4                 | Mat Trim System                      | Fabric Filter<br>(4345-00-10) | PM <sub>10</sub><br>VOC | 0.55<br>0.82    | 2.41<br>3.59    |
| 5                 | Rough Trim System                    | Fabric Filter<br>(4353-00-10) | PM <sub>10</sub><br>VOC | 0.57<br>0.85    | 2.51<br>3.74    |
| 6                 | Tongue & Groove and<br>Sawing System | Fabric Filter<br>(4363-00-10) | PM <sub>10</sub><br>VOC | 0.62<br>0.92    | 2.70<br>4.02    |

Table 4.1.2.: Emission Limits<sup>(1)</sup>

|                   |  |  |  | Emissio   | on Limit   |
|-------------------|--|--|--|---|--|
| Emission<br>Point | Source   | Control Device   | Pollutant  | Hourly<br>(pph)   | Annual<br>(tpy)                                      |
| 7                 | Sander Dust System   | Fabric Filter<br>(4374-00-10)                                  | PM <sub>10</sub><br>VOC  | 0.40<br>0.39  | 1.77<br>1.72   |
| 9                 | Dry Waste System   | Fabric Filter<br>(4397-00-10)                                  | PM <sub>10</sub><br>VOC  | 0.86<br>1.27  | 3.74<br>5.58   |
| 10 <sup>(2)</sup> | Energy Cell No. 1<br>(3800-00-10)<br>(Idle Run Mode Only)<br>Auxiliary Burners<br>(3816-00-11)<br>(Idle Run Mode Only)   | Multi-Clone<br>(3820-00-10)                                    | $\begin{array}{c} PM_{10}\\ SO_2\\ CO\\ VOC\\ NO_X\\ Barragene$  | 6.8<br>1.0<br>6.0<br>9.1<br>8.0<br>0.45   | 9.5<br>1.4<br>8.4<br>12.8<br>11.2<br>0.63            |
| 11 <sup>(2)</sup> | Energy Cell No. 2<br>(3900-00-10)<br>(Idle-Run Mode)<br>Auxiliary Burners<br>(3916-00-11)<br>(Idle-Run Mode)   | Multi-Clone<br>(3920-00-10)                                    | Benzene<br>Hydrochloric Acid<br>Lead Compounds<br>Methylene Chloride<br>Naphthalene<br>POM<br>Total HAP  | 0.43<br>0.22<br>0.01<br>0.07<br>0.43<br>0.43<br>2.71  | 0.03<br>0.31<br>0.01<br>0.10<br>0.60<br>0.60<br>3.79 |
| 21 <sup>(3)</sup> | Energy Cell No. 1 (3800-<br>00-10)<br>Energy Cell No. 2 (3900-<br>00-10)<br>Dryer No. 1 (3130-00-11)<br>Dryer No. 2 (3230-00-11)<br>Dryer No. 3 (3330-00-11)<br>Dryer No. 4 (3430-00-11)<br>OSB Press (4700-00-10)<br>Auxiliary Burners<br>(3816-00-11)<br>Auxiliary Burners<br>(3916-00-11) | Wet ESP No. 1<br>(4110-00-10)<br>Wet ESP No. 2<br>(4120-00-10) | PM <sub>2.5</sub> /PM <sub>10</sub> /PM<br>SO <sub>2</sub><br>CO<br>VOC<br>NO <sub>X</sub><br>Acetaldehyde<br>Acrolein<br>Formaldehyde<br>Lead Compounds<br>Methanol<br>Phenol<br>Propionaldehyde<br>Total HAP | 34.68<br>12.26<br>40.66<br>59.09<br>88.23<br>2.40<br>0.93<br>4.55<br>0.01<br>10.49<br>0.00<br>1.00<br>26.21 | N/A <sup>(3)</sup>                                   |

|                   |  |  |   | Emissio  | on Limit   |
|-------------------|--|--|---|--|--|
| Emission<br>Point | Source   | Control Device   | Pollutant   | Hourly<br>(pph)  | Annual<br>(tpy)  |
| 21 <sup>(4)</sup> | Energy Cell No. 1<br>(3800-00-10)<br>Energy Cell No. 2<br>(3900-00-10)<br>Dryer No. 1 (3130-00-11)<br>Dryer No. 2 (3230-00-11)<br>Dryer No. 3 (3330-00-11)<br>Dryer No. 4 (3430-00-11)<br>OSB Press (4700-00-10)<br>Auxiliary Burners<br>(3816-00-11)<br>Auxiliary Burners<br>(3916-00-11) | Wet ESP No. 1<br>(4110-00-10)<br>Wet ESP No. 2<br>(4120-00-10)<br>Regenerative<br>Catalytic<br>Oxidizer No. 1<br>(4440-00-10)<br>Regenerative<br>Catalytic Oxidizer<br>No. 2<br>(4460-00-10) | PM <sub>2.5</sub> /PM <sub>10</sub> /PM<br>SO <sub>2</sub><br>CO<br>VOC<br>NO <sub>X</sub><br>Acetaldehyde<br>Acrolein<br>Formaldehyde<br>Lead Compounds<br>Methanol<br>Phenol<br>Propionaldehyde<br>Total HAP                      | 34.68<br>12.26<br>44.66<br>16.84<br>88.23<br>0.73<br>0.28<br>4.45<br>0.01<br>3.21<br>0.00<br>0.31<br>11.34                 | N/A <sup>(5)</sup>   |
| 23 <sup>(6)</sup> | Energy Cell No. 1<br>(3800-00-10)<br>Energy Cell No. 2<br>(3900-00-10)<br>Dryer No. 1 (3130-00-11)<br>Dryer No. 2 (3230-00-11)<br>Dryer No. 3 (3330-00-11)<br>Dryer No. 4 (3430-00-11)<br>OSB Press (4700-00-10)<br>Auxiliary Burners<br>(3816-00-11)<br>Auxiliary Burners<br>(3916-00-11) | Wet ESP No. 1<br>(4110-00-10)<br>Wet ESP No. 2<br>(4120-00-10)<br>Biofilter<br>(4800-00-10)  | PM <sub>2.5</sub> /PM <sub>10</sub> /PM<br>SO <sub>2</sub><br>CO<br>VOC<br>NO <sub>X</sub><br>Acetaldehyde<br>Acrolein<br>Cumene<br>Formaldehyde<br>Lead Compounds<br>Methanol<br>Phenol<br>Propionaldehyde<br>Xylenes<br>Total HAP | 34.68<br>12.26<br>44.66<br>48.60<br>88.23<br>2.40<br>0.93<br>4.74<br>4.56<br>0.01<br>1.05<br>0.00<br>1.00<br>0.45<br>17.01 | 79.40<br>17.90<br>225.40<br>118.40<br>246.55<br>4.89<br>1.21<br>5.67<br>10.32<br>0.03<br>3.15<br>0.00<br>0.83<br>1.96<br>33.16 |

|                   |  |                |  | <u>Emis</u> sio  | Emission Limit   |  |
|-------------------|--|----------------|--|--|--|--|
| Emission<br>Point | Source   | Control Device | Pollutant  | Hourly<br>(pph)  | Annual<br>(tpy)  |  |
| 24                | OSB Press (4700-00-10)<br>(Bypass Mode)                    | N/A            | PM <sub>10</sub><br>CO<br>VOC<br>Acetaldehyde<br>Chlorine<br>Cumene<br>Formaldehyde<br>Methanol<br>MDI<br>Phenol | 2.5<br>9.0<br>36.0<br>1.94<br>1.14<br>12.0<br>6.00<br>15.5<br>0.03<br>0.52 | 0.48<br>2.95<br>7.86<br>0.33<br>0.09<br>1.10<br>1.49<br>4.88<br>0.01<br>0.06 |  |
| 27                | Emergency diesel-fired<br>generator                        | N/A            | Total HAP<br>PM <sub>10</sub><br>SO <sub>2</sub><br>CO<br>VOC<br>NO <sub>X</sub>                                 | 37.3<br>0.44<br>3.1<br>4.2<br>0.50<br>18.2                                 | 7.96<br>0.03<br>0.16<br>0.21<br>0.03<br>0.92                                 |  |
| 31                | Liquid Phenolic<br>Resin Tank No. 1                        | N/A            | VOC  |  | 0.01   |  |
| 32                | Liquid Phenolic<br>Resin Tank No. 2                        | N/A            |  |  |  |  |
| 33                | Liquid Phenolic<br>Resin Tank No. 3                        | N/A            |  |  | 0.01   |  |
| 34                | Liquid Phenolic<br>Resin Tank No. 4                        | N/A            |  |  |  |  |
| 35                | MDI Tank No. 1   | N/A            |  |  |  |  |
| 36                | MDI Tank No. 2   | N/A            | VOC  |  |  |  |
| 37                | Wax Tank No. 1   | N/A            |  |  |  |  |
| 38                | Wax Tank No. 2   | N/A            | VOC  |  | 0.01   |  |
| 39                | Natural gas fired<br>wax/resin tank heater<br>(8109-00-10) | N/A            | PM <sub>10</sub><br>SO <sub>2</sub><br>CO<br>VOC<br>NO <sub>X</sub>  | 0.03<br>0.01<br>0.29<br>0.02<br>0.34                                       | 0.12<br>0.01<br>1.30<br>0.11<br>1.54   |  |
| 40 & 41           | Paint Booth No. 1  | Filters        |  |  |  |  |
| 42 & 43           | Paint Booth No. 2  | Filters        | $PM_{10}$  | 0.39   | 1.71   |  |
| 44 & 45           | Paint Booth No. 3  | Filters        | 10   |  |  |  |

|                   |                                     |                       |           | Emission Limit  |                 |
|-------------------|-------------------------------------|-----------------------|-----------|-----------------|-----------------|
| Emission<br>Point | Source                              | <b>Control Device</b> | Pollutant | Hourly<br>(pph) | Annual<br>(tpy) |
| 46                | Liquid Phenolic<br>Resin Tank No. 5 | N/A                   | VOC       |                 | 0.01            |
| 47                | Liquid Phenolic<br>Resin Tank No. 6 | N/A                   |           |                 | 0.01            |

(1) The VOC emissions from emission points 1-11 are based on estimations using industry averages and not testing data.

(2) These emission limits are applicable only when the Energy Cells are in "Idle Run Mode" as defined under 4.1.3. As these emissions are less than those generated during normal operation or RCDME, they do not contribute to the facility's PTE.

(3) These emission limits are applicable only when the mill is operating under the RCDME as defined under 4.1.3. Emissions generated during the RCDME contribute toward the annual emission limits given under footnote (6) as applicable. Although the RCDME Emissions are contribute toward the limits under Emission Point 23 they are actually vented through Emission Point 21.

(4) The hourly emission limits are applicable when the RCOs are being utilized during all times of "normal operation" and during times of "Energy Cell Only Mode" as defined under 4.1.3. The annual emission limits also include contributions made during RCDME events.

- (5) Emissions when the RCOs are being utilized during all times of "normal operation" and during times of "Energy Cell Only Mode" as defined under 4.1.3. contribute toward the annual emission limits given under footnote (6) as applicable.
- (6) The hourly emission limits are applicable when the Biofilter is being utilized during all times of "normal operation" and during times of "Energy Cell Only Mode" as defined under 4.1.3. The annual emission limits also include contributions made during RCDME events.
- 4.1.3. For the purposes of this permit, the following operating scenarios are defined:
  - a. "Normal operation" shall mean those times when:
    - (1) The Energy Cells are in operation, material is being dried in the dryers, gases are vented through the operating WESPs and RCOs, and emitted from Emission Point 21; or
    - (2) The Energy Cells are in operation, material is being dried in the dryers, gases are vented through the operating WESPs and the Biofilter, and emitted from Emission Point 23.
  - b. "Idle run mode" shall be defined as those times when the Energy Cells are operating, no material is being dried in the dryers, gases are vented through the operating Multi-clones, and emitted from Emission Points 10 and 11.
  - c. "Energy Cell Only Mode" shall be defined as those times when the Energy Cells are operating, no material is being dried in the dryers, gases are vented through the operating WESPs, and emitted from Emission Point 21.
  - d. "RCDME" shall be defined as those times when the Energy Cells are operating, material is being dried in the dryers, gases are vented through the operating WESPs, and emitted from Emission Point 21.
- 4.1.4. Operation of the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) shall be in accordance with the following requirements:

- a. The permitted facility shall burn only hogged wood as the primary fuel or natural gas as the backup fuel to fire the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10). Alternative fuels may be used only after receiving prior written approval from the Director;
- b. During Idle Run Mode, Energy Cells shall be limited to a combined total of 2,800 hours of operation on a consecutive 12-month period; and
- c. During Idle Run Mode, the combined heat input rate to Energy Cells shall be limited to 40 MMBTU/hr. Additionally, the maximum heat input rate to each individual energy cell shall be less than 30 MMBTU/hr.
- 4.1.5. The auxiliary natural gas fired burners, designated as 3816-00-11 and 3916-00-11, (associated with the Energy Cells), shall not exceed a maximum design heat input of 29 MMBTU/hr per unit.
- 4.1.6. Pursuant to 40 CFR 63, Subpart DDDD, operation of the facility under the Routine Control Device Maintenance Exemption (RCDME) shall be according to the following requirements:
  - a. For each process unit, a maximum of 3% of its actual annual operating hours may be during periods when its controlling RCO or Biofilter is offline for routine maintenance. This exemption applies to each dryer (1-4) and the press. Additionally, since the press is controlled by both the RCOs or Biofilter, any and all time it operates while either RCO or Biofilter is offline for routine maintenance shall be counted fully towards its 3% limit;
  - b. In order to minimize emissions, the facility shall not process any pine during any time when either of the RCOs is offline for routine maintenance and the press and/or any of the dryers (1-4) which are controlled by the offline RCO continues to operate;
  - c. As a minimization strategy, the facility shall to the greatest extent practically possible perform routine maintenance during periods when the press and dryers are already offline (not producing product) for maintenance or other reasons;
  - d. As a minimization strategy, the facility shall to the greatest extent practically possible take only one RCO offline at a time for routine maintenance, continuing the normal operation of the other RCO so long as the process units which it controls are operating;
  - e The permittee shall follow the Standard Operating Procedure submitted as Attachment T in permit application R13-1761G to prevent pine from being processed during periods of operation under the RCDME; and
  - f. After startup of the Biofilter, operation of the facility under the RCDME shall only occur after a new RCDME request specific to the Biofilter (submitted pursuant to the requirements of Subpart DDDD) is approved in writing by the Director.
- 4.1.7. The permitted facility shall route the press vent exhaust fumes into the Energy Cells and Dryers during normal operations. At times when the press is processing wood materials, the facility will be allowed to exhaust press vent fumes directly to the atmosphere through a press Bypass Stack (emission point 24) for a maximum of 500 hours per consecutive 12 month period. When the presses are not processing wood, the press vent fumes may be exhausted directly to the atmosphere through the press Bypass Stack for an unrestricted amount of time.
- 4.1.8. The auxiliary natural gas fired burners (for Dryers No. 1 through No. 4), designated as 3130-00-11, 3230-00-11, 3330-00-11, and 3430-00-11, shall not exceed a maximum design heat input of 55 MMBTU/hr per unit.

- 4.1.9. The permittee shall not exceed the following material or production limits (annual limits based on a rolling twelve (12) month period):
  - a. Phenol formaldehyde resin (liquid or powder) shall not exceed 31,697,525 pounds/yr measured on a solids basis;
  - b. MDI shall not exceed 15,457,049 pounds/yr;
  - c. Wax shall not exceed 14,155,990 pounds/yr; and
  - d. Production of OSB shall not exceed a maximum hourly rate of 94 MSF/hr or a maximum annual rate of 753,360 MSF/yr as adjusted to 3/8 inch OSB.
- 4.1.10. The natural gas fired heater (Wax/Resin Tank Heater), designated as 8109-00-10, shall not exceed a maximum design heat input of 3.5 MMBTU/hr and shall not consume in excess of 30.7 million cubic feet of natural gas on an annual basis.
- 4.1.11. The permittee shall operate and maintain filter systems for the purpose of controlling particulate matter released from Paint Booths No. 1, 2 and 3.
- 4.1.12. All access roads used in conjunction with the operations permitted herein shall be paved.

#### 4.1.13. 45CSR2

The permitted facility shall comply with all applicable requirements of 45CSR2, provided, however, that compliance with any more stringent requirements under Section 4.0 of this permit shall also be demonstrated. The pertinent sections of 45CSR2 applicable to this facility include, but are not limited to, the following:

#### §45-2-3.1

No person shall cause, suffer, allow or permit emission of smoke an/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.

#### §45-2-11.1

Any fuel burning unit(s) having a heat input under ten (10) million B.T.U.'s per hour will be exempt from sections 4, 5, 6, 8, and 9. However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

#### 4.1.14. 45CSR7

The permitted facility shall comply with all applicable requirements of 45CSR7, provided, however, that compliance with any more stringent requirements under Section 4.00f this permit shall also be demonstrated. The pertinent sections of 45CSR7 applicable to this facility include, but are not limited to, the following:

#### §45-7-3.1

No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

#### §45-7-3.7

No person shall cause, suffer, allow or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device.

#### §45-7-4.1

No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

#### §45-7-4.2

Mineral acids shall not be released from any type source operation or duplicate source operation or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity given in Table 45-7B found at the end of this rule.

#### §45-7-5.1

No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

#### §45-7-5.2

The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

#### §45-7-8.1

At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

#### §45-7-8.2

The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.

#### §45-7-9.1

Due to unavoidable malfunction of equipment, emissions exceeding those set forth in this rule may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

#### 4.1.15. 45CSR10

The permitted facility shall comply with all applicable requirements of 45CSR10, provided, however, that compliance with any more stringent requirements under Section 4.0 of this permit shall also be demonstrated. The pertinent sections of 45CSR10 applicable to this facility include, but are not limited to, the following:

## §45-10-3.3

Maximum Allowable Emission Rate for Similar Units in All Priority III Regions Except Region IV. - No person shall cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:

#### §45-10-3.3.f

For Type 'b' and Type 'c' fuel burning units, the product of 3.2 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour.

#### §45-10-10.1

Any fuel burning units having a design heat input under ten (10) million BTU's per hour will be exempt from section 3 and sections 6 through 8. However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

#### §45-10-10.3

The owner or operator of a fuel burning unit(s) which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the requirements of section 8. Manufacturing operations in which the process is to partially combust wood during the manufacture of charcoal shall be exempt from the requirements of section 8.

#### 4.1.16. 45CSR27

The permitted facility shall comply with all applicable requirements of 45CSR27, provided, however, that compliance with any more stringent requirements under Section 4.0 shall also be demonstrated. The pertinent sections of 45CSR27 applicable to this facility include, but are not limited to, the following:

#### §45-27-3.1

Except as provided in Sections 3.2 and 3.3 of this rule, the owner or operator of a plant that discharges or may discharge a toxic air pollutant into the open air in excess of the amount shown in the Table A shall employ BAT at all chemical processing units emitting the toxic air pollutant: Provided, that any source or equipment specially subject to a federal regulation or standard shall not be required to comply with provisions more stringent than such regulation or standard.

#### 4.1.17 40 CFR 63, Subpart DDDD Add-on Control Systems Compliance Options (RCOs)

Except for periods when the mill is operating under the RCDME or during times of SSM, the permittee shall, while using the RCOs, limit emissions of total HAP from emission point 21, measured as THC (as carbon), to 20 ppmvd.

[Table 1B of 40 CFR 63, Subpart DDDD]

#### 4.1.18 40 CFR 63, Subpart DDDD Operating Requirements (RCOs)

The permittee shall meet the following RCO operating requirements:

- a. For a thermal oxidizer, maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test or maintain the 3-hour block average THC concentration in the thermal oxidizer exhaust below the maximum concentration established during the performance test.
- b. For a catalytic oxidizer, maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months or maintain the 3-hour block average THC concentration in the catalytic oxidizer exhaust below the maximum concentration established during the performance test.

#### [Table 2 of 40 CFR 63, Subpart DDDD]

4.1.19. 40 CFR 63, Subpart DDDD Add-on Control Systems Compliance Options (Biofilter)

Except for periods when the mill is operating under the RCDME or during times of SSM, the permittee shall, while using the Biofilter:

- a. Limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd; or
- b. Reduce methanol emissions by 90 percent; or

c. Reduce formaldehyde emissions by 90 percent. [Table 1B of 40 CFR 63, Subpart DDDD]

#### 4.1.20 40 CFR 63, Subpart DDDD Operating Requirements (Biofilters)

The permittee shall meet the following Biofilter operating requirements:

- a. Maintain the 24-hour block Biofilter bed temperature within the range established according to §63.2262(m); or
- b. Maintain the 24-hour block average THC concentration in the Biofilter exhaust below the maximum concentration established during the performance test.
   [Table 2 of 40 CFR 63, Subpart DDDD]
- 4.1.21 The permittee shall develop a written SSM plan according to 40 CFR 63, Section 63.6(e)(3).
- 4.1.22. Operation and Maintenance of Air Pollution Control Equipment. The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. [45CSR§13-5.11.]

#### 4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the operating limits set forth in Section 4.1.3(a) of this permit, the permittee shall monitor and record the monthly and rolling twelve month total number of hours the Energy Cells (ID No. 3800-00-10 and ID No. 3900-00-10) operate in the idle run mode.
- 4.2.2. For the purpose of determining compliance with the operating limits set forth in Section 4.1.7. of this permit, the permittee shall monitor and record the monthly and rolling twelve month total number of hours the press vent fumes are being exhausted directly to the atmosphere through the press Bypass Stack (Emission Point 24).
- 4.2.3. For the purpose of determining compliance with the throughput limits set forth in Section 4.1.9(a) through (c) of this permit, the permittee shall monitor and record the monthly and twelve month rolling total throughput of phenol formaldehyde resin (liquid or powder) as measured on a solids basis, polymeric diphenylmethane dissocyanate (MDI), and wax.
- 4.2.4. For the purpose of determining compliance with the production limit set forth in Section 4.1.9(d) of this permit, the permittee shall monitor and record the monthly and rolling twelve month total of OSB (as adjusted to 3/8 inch) produced at the facility. Compliance with the hourly production limit shall be based on the average hourly production rate as calculated for each month.
- 4.2.5. The permittee shall meet all applicable RCO and Biofilter monitoring requirements pursuant to 40 CFR 63, Subpart DDDD.

## 4.3. **Performance Testing Requirements**

- 4.3.1. Performance testing shall be in accordance with the following:
  - At the same time as the initial performance test required under 40 CFR 63, Subpart DDDD, the permittee shall conduct, or have conducted, a performance test during "normal mode" as defined under 4.1.3(a)(2) to determine compliance at Emission Point 23 with the hourly emission limits of VOCs and the HAPs targeted by 40 CFR 63, Subpart DDDD;
  - b. Use of test methods shall be in accordance, where applicable, with 40 CFR 63, Subpart DDDD or in accordance with information contained in an approved test protocol; and
  - b. Any required performance test shall be in accordance with 3.3.1.
- 4.3.2. The permittee shall meet all applicable RCO and Biofilter testing requirements pursuant to 40 CFR 63, Subpart DDDD.

#### 4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
  - a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.
  - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.4.4. [Reserved]
- 4.4.5. [Reserved]
- 4.4.6. [*Reserved*]
- 4.4.7. For the purpose of determining compliance with 4.1.6(a), the permittee shall keep a daily record of any start-up, any shut-down, total hours operated and hours operated while the unit's controlling RCO or Biofilter is offline for routine control device maintenance. And, as regards the RCO and Biofilter, the permittee shall keep daily records of any start-up, any shut-down, total hours operated and total hours off-line for routine maintenance.
- 4.4.8 For the purpose of determining compliance with 4.1.6(b), the permittee shall keep records which indicate how much, if any, pine is processed during any period of routine RCO maintenance.
- 4.4.9. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
   [40 CFR §60.48c(g)]
- 4.4.10. The permittee shall meet all applicable RCO and Biofilter record-keeping requirements pursuant to 40 CFR 63, Subpart DDDD

#### 4.5. **Reporting Requirements**

4.5.1. The permittee shall meet all applicable RCO and Biofilter reporting requirements pursuant to 40 CFR 63, Subpart DDDD.

## **CERTIFICATION OF DATA ACCURACY**

| I, the undersigned, hereby certify that, based on information and belief formed after reasonable |                      |      |                |
|--|----------------------|------|----------------|
| inquiry, all information contained in the attached   |                      |      | , representing |
| the period beginning   | and ending           |      | , and          |
| any supporting documents appended hereto, is true, accu  | urate, and complete. |      |                |
|  |                      |      |                |
| Signature <sup>1</sup>   |                      | Date |                |
| Name and Title   |                      |      |                |
| Telephone No   | _ Fax No             |      |                |
|  |                      |      |                |

<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.