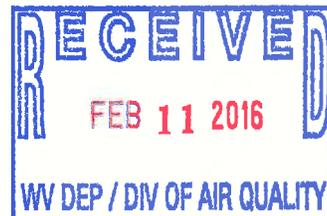


609 West Main Street • P.O. Drawer 190 • Clarksburg, WV 26302-0190
304.624.9700 • 304.622.0981 • 304.842.3325 • <http://www.msesinc.com>
Office Fax 24 Hour World Wide Web

February 8, 2016
Project No. 16-027

Ms. Carrie McCumbers
Title V Program Manager
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, West Virginia 25304



**Renewal of Title V Permit R30-02300023-2011
Allegheny Wood Products International, Inc.
Plant 4
Petersburg, West Virginia**

Dear Ms. McCumbers:

Please find enclosed two (2) signed copies of the Title V renewal application package for Allegheny Wood Products International, Inc. (AWPI) Plant #4. In accordance with the Title V Completeness Checklist we are requesting a permit shield.

Should you have any questions or require additional information, please advise.

Sincerely,

Lori Steele
Senior Environmental Scientist

Cc: Tom Plaughter - AWPI, Inc.

enclosures

**February 2016
Project No. 16-027**

REGULATION 30 PERMIT RENEWAL APPLICATION

PERMIT NUMBER R30-02300023-2011

**ALLEGHENY WOOD PRODUCTS
INTERNATIONAL, INC.
PLANT # 4
PETERSBURG, WEST VIRGINIA**

PREPARED BY:

**MSES Consultants, Inc.
P.O. Drawer 190
Clarksburg, West Virginia 26302-0190
(304) 624-9700**

TABLE OF CONTENTS

List of Attachments

I. Application

II. Attachments

III. CD

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
A	Area Map
B	Plot Plan
C	Process Flow Diagram(s)
D	Title V Equipment Table
E	Emission Unit Forms
G	Air Pollution Control Device Form
H	Compliance Assurance Monitoring (CAM) Plan Form

11. Mailing Address		
Street or P.O. Box: P.O. Box 130		
City: Petersburg	State: WV	Zip: 26847-
Telephone Number: (304) 257-1082	Fax Number: (304) 257-9246	

12. Facility Location		
Street: 108 Airport Road	City: Petersburg	County: Grant
UTM Easting: 660.476 km	UTM Northing: 4,316.993 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<p>Directions: From the intersection of US Route 220 and State Route 28 in Petersburg follow 220 South to Fish Hatchery Road (220/2). Turn right onto Fish Hatchery Road. Follow to Airport Road. Turn right. Plant is on the right.</p>		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Virginia Maryland	
Is facility located within 100 km of a Class I Area ¹ ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, do emissions impact a Class I Area ¹ ? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the area(s). Dolly Sods Wilderness Otter Creek Wilderness Shenandoah National Park	
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: E. Thomas Plaughter		Title: VP Operations
Street or P.O. Box: P.O. Box 130		
City: Petersburg	State: WV	Zip: 26847-
Telephone Number: (304) 257-1082	Fax Number: (304) 257-9246	
E-mail address: tplaughter@alleghenywood.com		
Environmental Contact: Brian Booth		Title: Mill Manager
Street or P.O. Box: P.O. Box 130		
City: Petersburg	State: WV	Zip: 26847-
Telephone Number: (304) 257-9103	Fax Number: (304) 257-9655	
E-mail address: bbooth@alleghenywood.com		
Application Preparer: Lori Steele		Title: Senior Environmental Scientist
Company: MSES Consultants, Inc.		
Street or P.O. Box: P.O. Drawer 190		
City: Clarksburg	State: WV	Zip: 26302-0190
Telephone Number: (304) 624-9700	Fax Number: (304) 622-0981	
E-mail address: lsteele@msesinc.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Lumber Drying Kilns	Kiln Dried Hardwood Lumber	321113	2421
Planing Mill	Dimensional Lumber	321113	2421
Boilers	Process Steam for Kilns	321113	2421

Provide a general description of operations.

Allegheny Wood Products International, Inc. operates a dry kiln facility, a sawing and planing facility, and processes scrap wood for use as fuel in the boilers. There are thirteen (13) drying kilns at the facility that operate with steam heat generated from the boilers.

- 15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.
- 16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."
- 17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input checked="" type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input checked="" type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <p>40CFR60, Subpart Dc. The main boiler #2 is not subject to the SO₂ and PM standards because it is under 30 mmbtu/hr heat input.</p>
<input checked="" type="checkbox"/> Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

Open burning prohibited. 45CSR6-3.1.
Open burning exemptions. 45CSR6-3.2.
Asbestos. Inspect facility prior to demolition or renovation. Notification of agencies. 40CFR61 and 45CSR15.
Odor prohibited. 45CSR4-3.1. State-Enforceable only.
Standby plan for reducing emissions. 45CSR11-5.2.
Emission inventory. WV Code 22-5-4(a)(14).
Ozone-depleting substances. 40CFR82, Subpart F.
Risk Management Plan. 40CFR68.
Fugitive particulate emissions from manufacturing processes and storage structures. 45CSR7-5.1., R13-1869, §B.3.
Control of fugitive particulate emissions. 45CSR7-5.2., R13-1869, §B.3.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Stack testing as required by the Director. WV Code §§ 22-5-4(a)(14-15), 45CSR2, 45CSR10, 45CSR7 and 45CSR13.
Odors. Maintain a record of all odor complaints received, any investigation, and any response. 45CSR30-5.1.c. State-enforceable only.
Open burning. Maintain record of Director's notification. 45CSR30-5.1.c.
Standby plan for reducing emissions. Prepare a standby plan if required. 45CSR11-5.2.
Certified emissions statement. Submit a certified emission statement and pay fees annually. 45CSR30-8.
Compliance certification. Submit to WVDAQ and USEPA annually by March 15th. 45CSR30-5.3.e.
Semi-annual monitoring reports. Submit by March 15th and September 15th. 45CSR30-5.1.c.3.A.
Deviations. Submit reports and notices due to emergency or upset conditions. 45CSR30-5.7.
New applicable requirements. 45CSR30-4.3.h.1.B.

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	171.06
Nitrogen Oxides (NO _x)	13.17
Lead (Pb)	0.0036
Particulate Matter (PM _{2.5}) ¹	16.33
Particulate Matter (PM ₁₀) ¹	21.84
Total Particulate Matter (TSP)	80.92
Sulfur Dioxide (SO ₂)	2.10
Volatile Organic Compounds (VOC)	8.88
Hazardous Air Pollutants²	Potential Emissions
HAPs from Combustion	0.83
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Carbon Dioxide	14,639
Nitrous Oxide	0.97
Methane	1.58

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input checked="" type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input checked="" type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input checked="" type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input checked="" type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input checked="" type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input checked="" type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

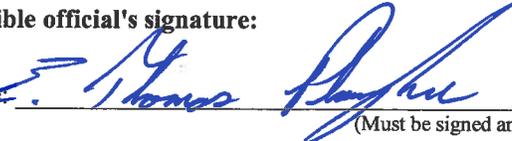
Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

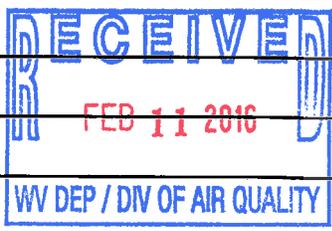
Name: E. Thomas Plaughter

Title: VP of Operations

Responsible official's signature:

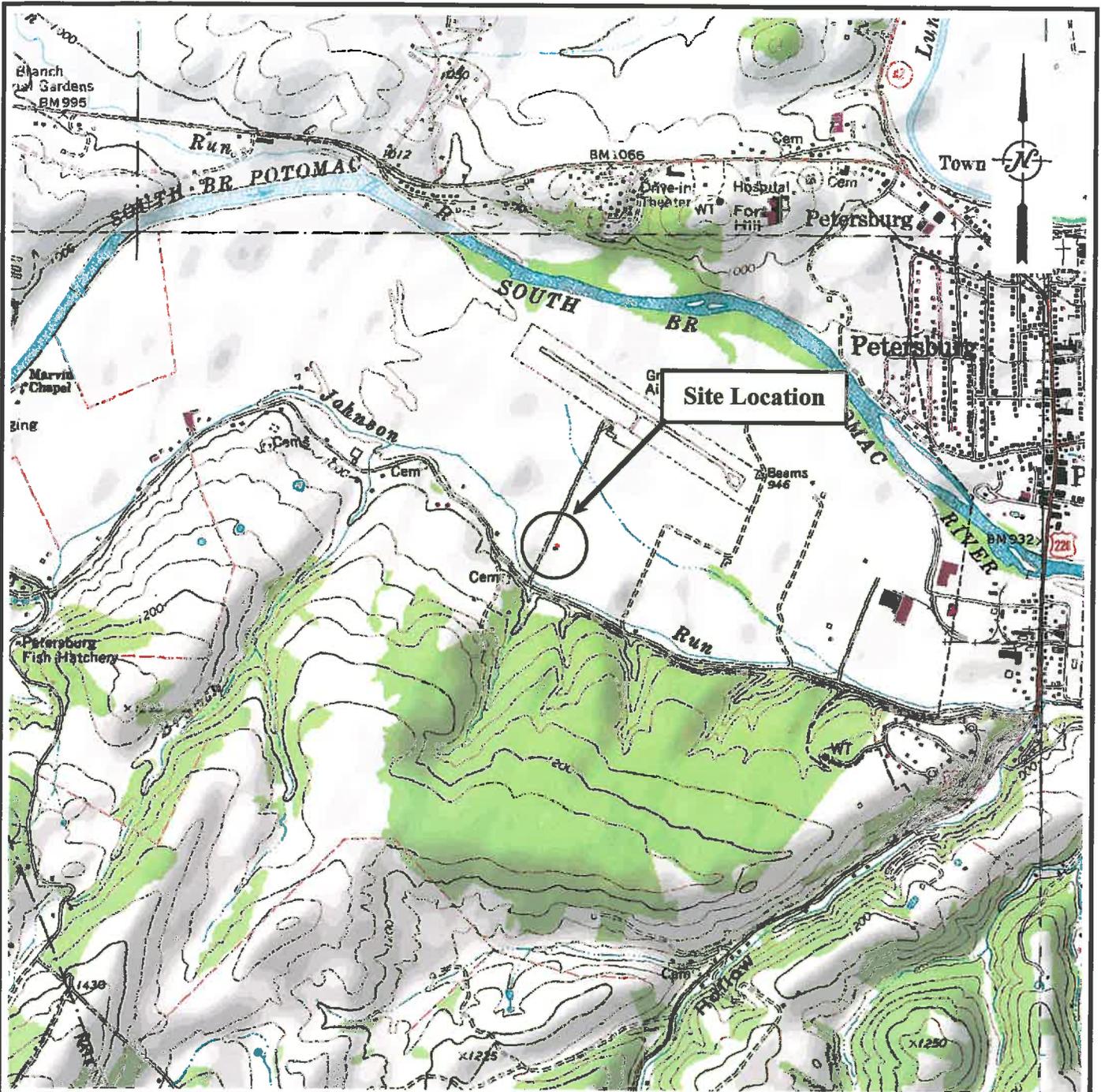
Signature:  Signature Date: 2/5/2016
 (Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map	
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)	
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)	
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table	
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)	
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)	
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)	
<input checked="" type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)	

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/dag, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A
Area Map



Reference:
 3-D TopoQuads © DeLorme,
 Yarmouth, Me 04096
 Source Data:
 7.5 Minute USGS
 Topographic Quadrangles
 Petersburg West, WV
 Petersburg East, WV
 Rig, WV
 Maysville, WV

Area Map

Scale 1" = 2000'

MSES Consultants, Inc.
 Clarksburg, West Virginia

**Allegheny Wood Products
 International, Inc.**

**Mill #4 Regulation 30
 Permit Application**

Project No. 16-027

Attachment A

ATTACHMENT B

Plot Plan(s)

ATTACHMENT C

Process Flow Diagram(s)

MSDS PROJECT NO. 03-027
 CAD FILE NO. 03-027-2 / DISK 1711

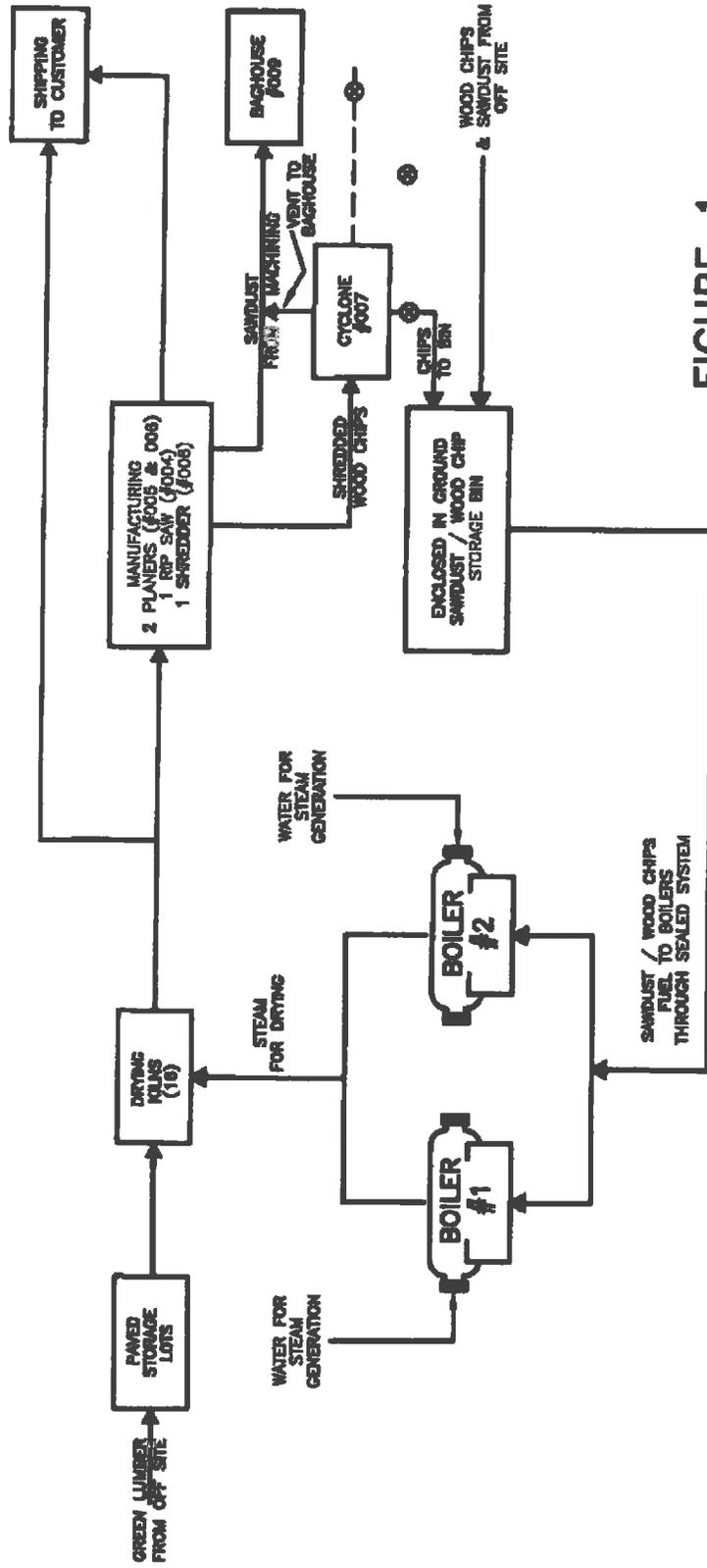


FIGURE 1

ALLEGHENY WOOD PRODUCTS, INC.

PLANT #4
 PETERSBURG, WV

REGULATION 30 APPLICATION

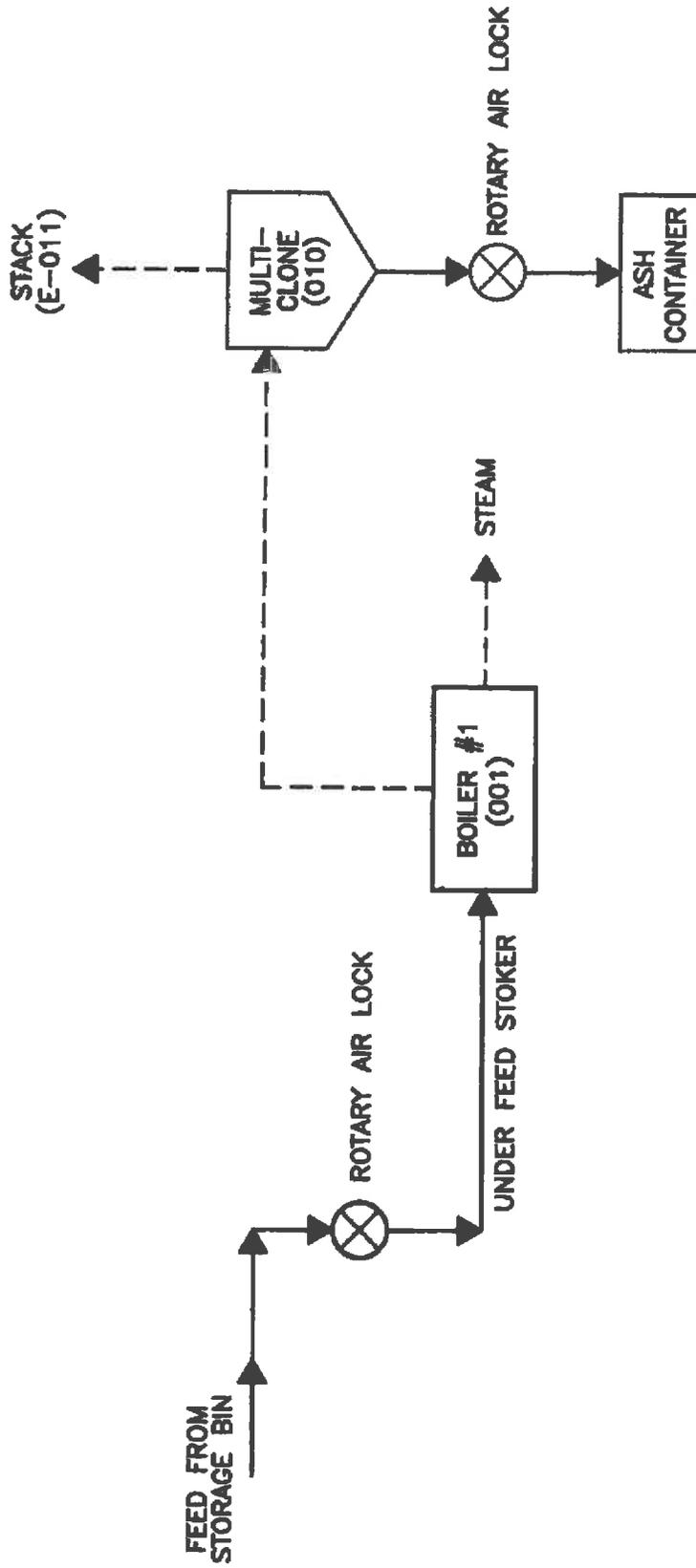
FACILITY PROCESS FLOW DIAGRAM

LEGEND

➔ PRODUCT FLOW

➔ EMISSION

MSDS PROJECT NO. 03-027
CAD FILE NO. 03-027-2 / DISK 1711



LEGEND

—▶ PRODUCT FLOW

- - -▶ EMISSION

FIGURE 2

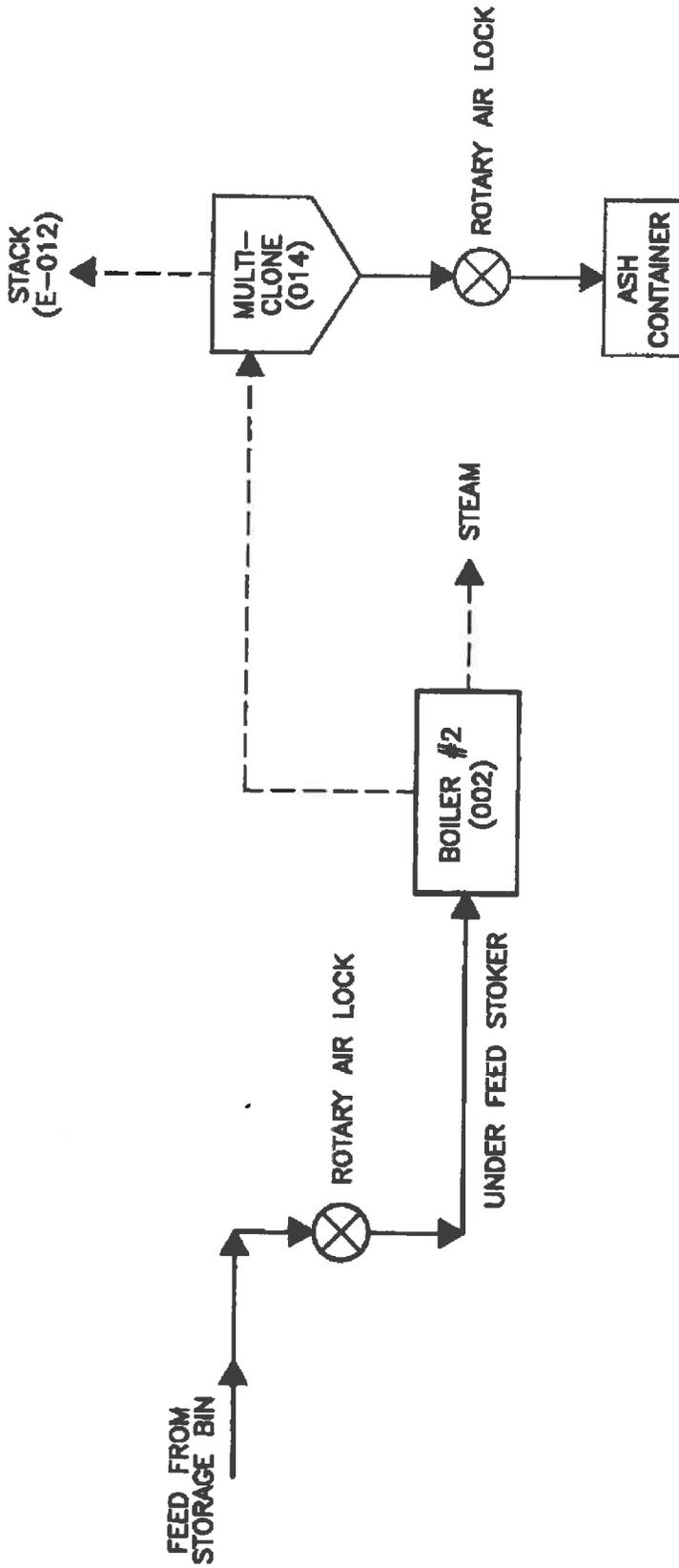
ALLEGHENY WOOD PRODUCTS, INC.

PLANT #4
PETERSBURG, WV

REGULATION 30 APPLICATION

BOILER #1
PROCESS FLOW DIAGRAM

MSDS PROJECT NO. 03-027
CAD FILE NO. 03-027-2 / DISK 1711



LEGEND

—————> PRODUCT FLOW

- - - - -> EMISSION

FIGURE 3

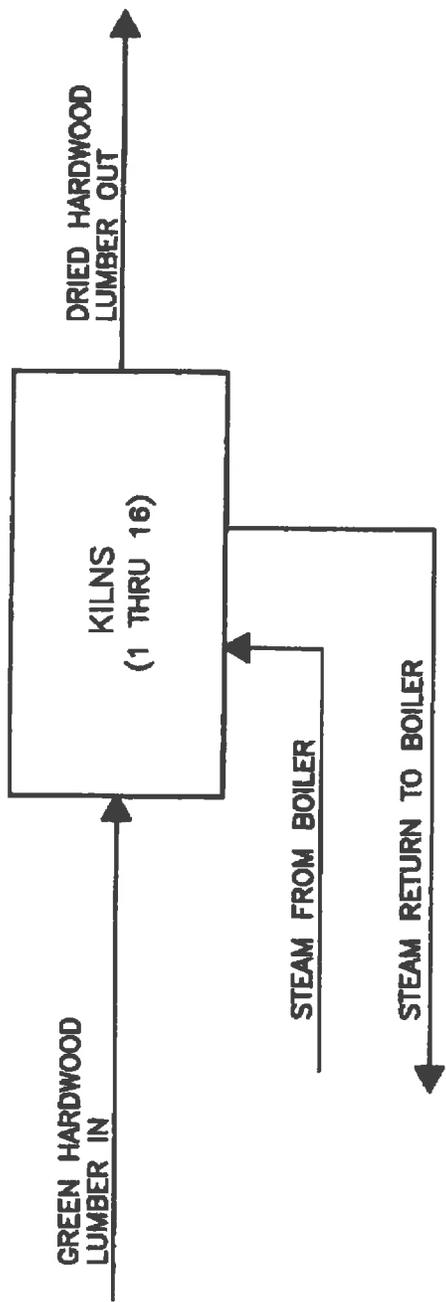
ALLEGHENY WOOD PRODUCTS, INC.

PLANT #4
PETERSBURG, WV

REGULATION 30 APPLICATION

BOILER #2
PROCESS FLOW DIAGRAM

USES PROJECT NO. 03-027
CAD FILE NO. 03-027-2 / DISK 1711



LEGEND

- ▶ PRODUCT FLOW
- - -▶ EMISSION

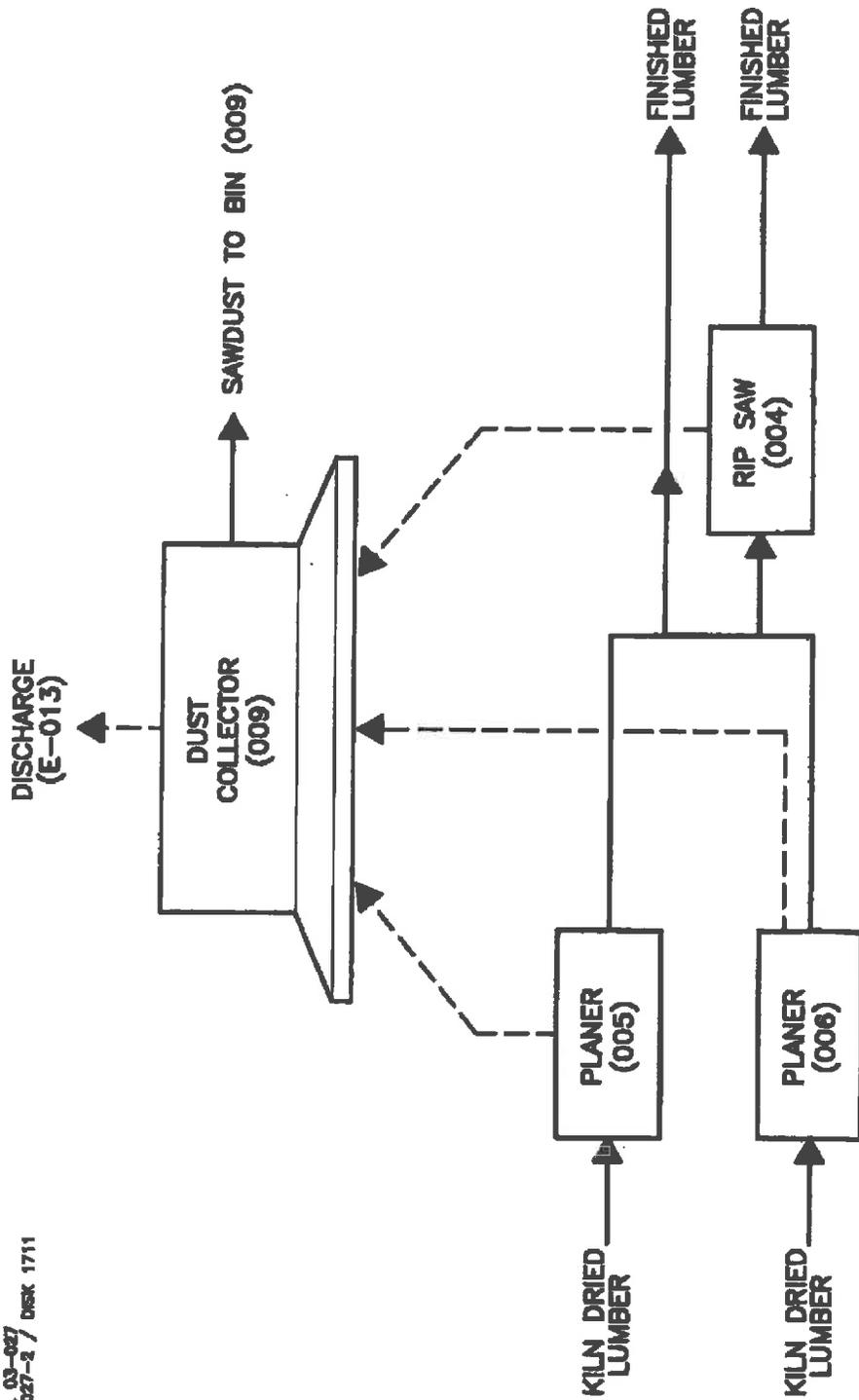
FIGURE 4

ALLEGHENY WOOD PRODUCTS, INC.

PLANT #4
PETERSBURG, WV

REGULATION 30 APPLICATION
KILNS
PROCESS FLOW DIAGRAM

MSDS PROJECT NO. 03-007
CAD FILE NO. 03-027-2 / DSK 1711



L E G E N D

—————> PRODUCT FLOW

- - - - -> EMISSION

FIGURE 5

ALLEGHENY WOOD PRODUCTS, INC.

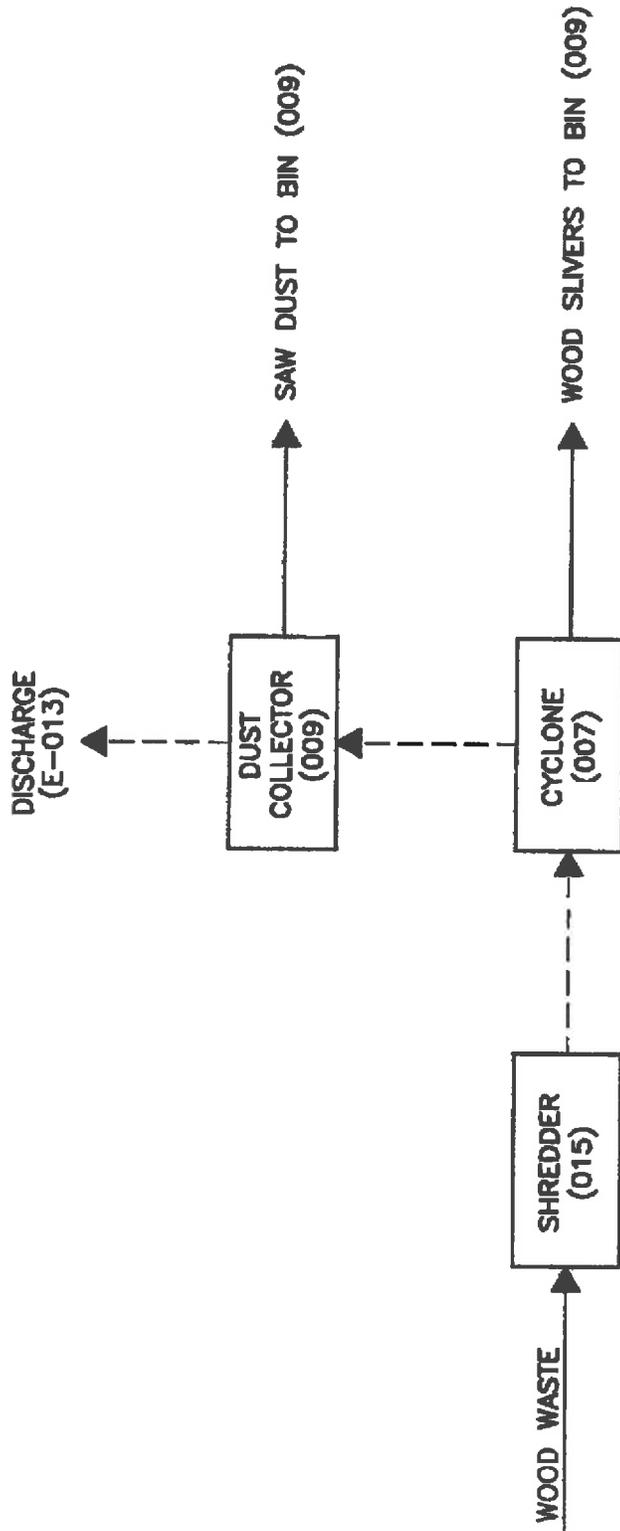
PLANT #4

PETERSBURG, WV

REGULATION 30 APPLICATION

RIP SAW / PLANERS
PROCESS FLOW DIAGRAM

MSDS PROJECT NO. 03-027
CAD FILE NO. 03-027-2 / DISK 1711



LEGEND

—▶ PRODUCT FLOW

- - -▶ EMISSION

FIGURE 6

ALLEGHENY WOOD PRODUCTS, INC.

PLANT #4
PETERSBURG, WV

REGULATION 30 APPLICATION

SHREDDER / CYCLONE
PROCESS FLOW DIAGRAM

ATTACHMENT D

Title V Equipment Table

ATTACHMENT E
Emission Unit Form(s)

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 001	Emission unit name: Wood Fired Boiler #1 Stand-by Boiler	List any control devices associated with this emission unit: Multiclone 010
--	---	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

5.99 mmbtu/hr DHI wood waste fueled boiler. Utilized as a back-up boiler.

Manufacturer: Lambion	Model number: 4NL-827	Serial number: N/A
Construction date: MM/DD/YYYY	Installation date: 01/01/1984	Modification date(s): MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 2,000 lb/hr wood waste burned

Maximum Hourly Throughput: 6,616 lb/hr steam	Maximum Annual Throughput: 57.96 x 10 ⁶ lb steam	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
Maximum design heat input and/or maximum horsepower rating: 5.99 mmbtu/hr	Type and Btu/hr rating of burners: Under feed stoker, variable speed

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

2,000 lb/hr and 8,760 tons/year of wood waste

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood waste	57.1 mg/Kg	0.69 wt%	5,012 Btu/lb

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	3.59	15.74
Nitrogen Oxides (NO _x)	1.32	5.77
Lead (Pb)	0.00029	0.00126
Particulate Matter (PM _{2.5})	2.55	11.17
Particulate Matter (PM ₁₀)	3.02	13.22
Total Particulate Matter (TSP)	3.35	14.69
Sulfur Dioxide (SO ₂)	0.15	0.66
Volatile Organic Compounds (VOC)	0.23	1.0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
HAPs from Combustion	0.067	0.29
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Carbon Dioxide	1,168	5,116
Nitrous Oxide	0.078	0.34
Methane	0.13	0.55
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>AP-42 Emission factors Chapter 1.6 Tables 1.6-1, 1.6-2, 1.6-3, 1.6-4 and 1.6-5. (July 2001)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed ten percent (10%) opacity based on a six (6) minute block average. 45CSR2-3.1., 45CSR13 – Permit R13 – R13-1869A §B.1 & B.2.

No owner or operator subject to the provisions of 45CSR10 shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. 45CSR10-11.1., 45CSR13 – Permit R13-1869A §B.1.

Biennial performance tune-up. 45CSR34, 40CFR63.1110(a)(1), 63.11201(b), 63.11201(d), 63.11210(c), 63.11223

Operate and maintain boiler and associated air pollution control equipment in accordance with safety and good air pollution control practices for minimizing emissions. 45CSR34, 40CFR63.11205(a).

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Respond to excursion or exceedance. 45CSR30-5.1.c., 40CFR64.7(d).

Document need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Submit to the Director of the DAQ, a test protocol detailing the proposed test methods, the date, and the time of the proposed testing is to take place, as well as identifying the sample locations and other relevant information. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. The test results shall be submitted to the Director no more than sixty (60) days after the date the testing takes place. 45CSR13 – Permit R13-1869A §B.9.

Required tests shall be conducted in accordance with methods set forth in 40CFR60, Appendix A. 45CSR13 – Permit R13-1869, §B.8.

Keep records of each notification and report submitted for compliance with Subpart JJJJJ. Keep records of tune-up dates, monthly fuel usage, malfunctions, and actions taken during periods of malfunction to minimize emissions. 45CSR34, 40CFR63.11225(c)

Keep records for 5 years with a minimum of 2 years on site. 45CSR34, 40CFR63.11225(d)

Maintain records of monitoring data, corrective actions taken, any written quality improvement plan required per CAM rule, and other supporting information. 45CSR30-5.1.c., 40CFR64.9(b).

Submit Initial Notification and Notification of Compliance Status in accordance with schedule. 45CSR34, 40CFR63.11225(a).

Prepare annual compliance certification report by March 1 of each year and submit by March 15 if requested. 45CSR34, 40CFR63.11225(b).

Report fuel switch. 45CSR34, 40CFR63.11225(g).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 002	Emission unit name: Wood Fired Boiler #2 Main Boiler	List any control devices associated with this emission unit: Multiclones 014 and 015
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

11.15 mmbtu/hr DHI wood waste fueled boiler. Utilized as the primary boiler.

Manufacturer: Superior	Model number: 3-SF-1788-S15-M	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 01/01/1992	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1,320 lb/hr wood waste burned

Maximum Hourly Throughput: 8,625 lb/hr steam	Maximum Annual Throughput: 75.555 x 10 ⁶ lb steam	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: 11.15 mmbtu/hr	Type and Btu/hr rating of burners: Under feed stoker, variable speed
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

3,120 lb/hr and 13,665 tons/year of wood waste

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood waste	57.1 mg/Kg	0.69 wt%	5,012 Btu/lb

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	35.46	155.3
Nitrogen Oxides (NO _x)	1.69	7.4
Lead (Pb)	0.00054	0.0023
Particulate Matter (PM _{2.5})	2.59	11.3
Particulate Matter (PM ₁₀)	3.07	13.4
Total Particulate Matter (TSP)	3.41	14.9
Sulfur Dioxide (SO ₂)	0.33	1.45
Volatile Organic Compounds (VOC)	1.8	7.88
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
HAPs from Combustion	0.12	0.54
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Carbon Dioxide	2,174	9,523
Nitrous Oxide	0.14	0.63
Methane	0.23	1.03
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Stack test, April 2001 and AP-42 Emission factors Chapter 1.6 Tables 1.6-3 and 1.6-4, July 2001</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Shall only use wood waste as fuel. Not more than 3,120 lb/hr or 13,665 tpy of wood waste consumed. 45CSR13 – Permit R13-1869A §A.1.

Minimize emissions at all times including start-up, shutdowns, and malfunctions. 45CSR2-9.2., 45CSR13 – Permit R13-1869A §B.1.

Visible emissions shall not exceed ten percent (10%) opacity based on a six (6) minute block average. 45CSR2-3.1., 45CSR13 – Permit R13 – R13-1869A §§B.1 & B.2.

Visible emission standards apply at all times except start-ups, shutdowns and malfunctions. 45CSR2-9.1., 45CSR13 – R13-1869A §§B.1.

PM emissions shall not exceed 3.41 lb/hr (14.9 tpy). 45CSR13 – Permit R13-1869A §A.2.

Addition of sulfur oxides to exit gas stream is prohibited unless approved by the Secretary. 45CSR2-4.4., 45CSR13 – Permit R13-1869A §B.1.

Control fugitive emissions associated with ash and fuel handling. 45CSR2-5., 45CSR13 – Permit R13-1869A §§B.1. & B.2.

Sulfur dioxide limit of 0.33 lb/hr (1.45 tpy). 45CSR13 – Permit R13-1869A §A.2.

No owner or operator subject to the provisions of 45CSR10 shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. 45CSR10-11.1., 45CSR13 – Permit R13-1869A §B.1.

Nitrogen oxides limit of 1.69 lb/hr (7.4 tpy). 45CSR13 – Permit R13-1869A §A.2.

Volatile organic compound limit of 1.8 lb/hr (7.88 tpy). 45CSR13 – Permit R13-1869A §A.2.

Carbon monoxide limit of 35.46 lb/hr (155.3 tpy). 45CSR13 – Permit R13-1869A §A.2.

Perform energy assessment. 45CSR34, 40CFR63.1119(a)(3), 63.11201(b), 63.11201(d), and 63.11210(c)

Biennial performance tune-up. 45CSR34, 40CFR63.1110(a)(1), 63.11201(b), 63.11201(d), 63.11210(c), 63.11223

Operate and maintain boiler and associated air pollution control equipment in accordance with safety and good air pollution control practices for minimizing emissions. 45CSR34, 40CFR63.11205(a)

40 CFR 64 Compliance Assurance Monitoring.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct daily Method 22-like visible emission checks. 45CSR30-5.1.c., 40CFR64.3(a), 64.3(b), 64.6(c)(2).

Respond to excursion or exceedance. 45CSR30-5.1.c., 40CFR64.7(d).

Document need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Submit to the Director of the DAQ, a test protocol detailing the proposed test methods, the date, and the time of the proposed testing is to take place, as well as identifying the sample locations and other relevant information. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. The test results shall be submitted to the Director no more than sixty (60) days after the date the testing takes place. 45CSR13 – Permit R13-1869A §B.9.

Calculations using stack test data and actual wood waste burned per hour can be used to demonstrate compliance. The permittee shall record the amount of wood waste burned, the hours of operation, and calculate the pounds of wood waste burned per hour. Keep records for five (5) years. Conduct a stack test within five (5) years ± 12 months beginning with the most recent required stack test to determine compliance with CO limit. 45CSR13 – Permit R13-1869A §A.3., 45CSR30-5.1.c., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).

Required tests shall be conducted in accordance with methods set forth in 40CFR60, Appendix A. 45CSR13 – Permit R13-1869, §B.8.

Keep records of operating schedule and quantity and quality of fuel consumed. 45CSR2-8.3.c., 45CSR2A-7.1.a. & 7.1.a.3., 45CSR13 – Permit R13-1869A §B.1., 45CSR16, 40CFR60.48c(g).

Keep daily and monthly records of wood waste burned. 45CSR13 – Permit R13-1869A §B.10., 45CSR30-5.1.c.

Keep records of each notification and report submitted for compliance with Subpart JJJJJJ. Keep records of tune-up dates, monthly fuel usage, malfunctions, and actions taken during periods of malfunction to minimize emissions. 45CSR34, 40CFR63.11225(c)

Keep records for 5 years with a minimum of 2 years on site. 45CSR34, 40CFR63.11225(d)

Maintain records of monitoring data, corrective actions taken, any written quality improvement plan required per CAM rule, and other supporting information. 45CSR30-5.1.c., 40CFR64.9(b).

Report any malfunction which results in any excess particulate matter emissions or excess opacity. 45CSR2-9.3., 45CSR13 – Permit R13-1869A §B.1.

Report excess opacity or excess particulate matter emissions resulting from a malfunction except excess opacity less than 30 minutes or less than 40%. 45CSR2-9.3.a., 45CSR13 – Permit R13-1869A §B.1.

Report any malfunction which results in excess particulate matter emissions or opacity by the end of the next business day after becoming aware of such condition. Submit a certified written report concerning the malfunction within 30 days. 45CSR2-9.3.b., 45CSR13 – Permit R13-1869A §B.1.

Submit signed Notification of Compliance Status for tune-up and energy assessment report. 45CSR34, 40CFR63.11214.

Submit Initial Notification and Notification of Compliance Status in accordance with schedule. 45CSR34, 40CFR63.11225(a).

Prepare annual compliance certification report by March 1 of each year and submit by March 15 if requested. 45CSR34, 40CFR63.11225(b).

Report fuel switch. 45CSR34, 40CFR63.11225(g).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 004	Emission unit name: Rip Saw	List any control devices associated with this emission unit: Baghouse 009
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Rip Saw with a design capacity of 1,250 linear ft/hr of lumber.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 01/01/1992	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1,250 linear ft/hr lumber

Maximum Hourly Throughput: 1,250 linear ft/hr lumber	Maximum Annual Throughput: 10.95 x 10 ⁶ linear ft of lumber	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners: N/A
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	1.56	6.84
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application February 1995) and AP42 Table 10.3-1.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed twenty percent (20%) opacity. 45CSR7-3.1., 45CSR13 – Permit R13 – R13-1869 §B.3.

Visible emission standards shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty percent (40%) opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. 45CSR7-3.2., 45CSR13 – R13-1869 §B.3.

No particulate matter emissions in excess of the quantity specified in Table 45-7A of 45CSR7. 45CSR7-4.1., 45CSR13 – Permit R13-1869 §B.3.

Excess emissions may be permitted by the Director for up to ten (10) days due to unavoidable malfunction. 45CSR7-10., 45CSR13 – Permit R13-1869 §B.3.

Compliance assurance monitoring plan. 40CFR64.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct daily Method 22-like visible emission checks during periods of normal facility operation and appropriate weather conditions for a sufficient time interval not less than one (1) minutes. 45CSR30-5.1.c., 45CSR7A-2.1., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).

Response to excursions or exceedances. 45CSR30-5.1.c., 40CFR64.7(d).

Documentation of need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Monitor all applicable control devices to ensure the lowest fugitive particulate emissions are reasonably achievable. 45CSR30-5.1.c.

Develop and implement a Quality Improvement Plan if more than 5 excursions occur during a 6-month period. 45CSR30-5.1.c., 40CFR64.8(a).

Keep records of all monitoring data required. 45CSR30-5.1.c.

Prepare and submit a CAM plan at permit renewal. 40CFR64.3(a), 64.3(b), 64.6(c)(2), 64.7(d), 64.7(e), 64.8(a), 64.9(b).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 005	Emission unit name: Planer	List any control devices associated with this emission unit: Baghouse 009
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Planer with a design capacity of 625 linear ft/hr of lumber.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 01/01/1992	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 625 linear ft/hr lumber

Maximum Hourly Throughput: 625 linear ft/hr lumber	Maximum Annual Throughput: 5.475 x 10 ⁶ linear ft of lumber	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners: N/A
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	0.78	3.42
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application February 1995) and AP42 Table 10.3-1.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed twenty percent (20%) opacity. 45CSR7-3.1., 45CSR13 – Permit R13 – R13-1869 §B.3.

Visible emission standards shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty percent (40%) opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. 45CSR7-3.2., 45CSR13 – R13-1869 §B.3.

No particulate matter emissions in excess of the quantity specified in Table 45-7A of 45CSR7. 45CSR7-4.1., 45CSR13 – Permit R13-1869 §B.3.

Excess emissions may be permitted by the Director for up to ten (10) days due to unavoidable malfunction. 45CSR7-10., 45CSR13 – Permit R13-1869 §B.3.

Compliance assurance monitoring plan. 40CFR64.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct daily Method 22-like visible emission checks during periods of normal facility operation and appropriate weather conditions for a sufficient time interval not less than one (1) minutes. 45CSR30-5.1.c., 45CSR7A-2.1., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).

Response to excursions or exceedances. 45CSR30-5.1.c., 40CFR64.7(d).

Documentation of need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Monitor all applicable control devices to ensure the lowest fugitive particulate emissions are reasonably achievable. 45CSR30-5.1.c.

Develop and implement a Quality Improvement Plan if more than 5 excursions occur during a 6-month period. 45CSR30-5.1.c., 40CFR64.8(a).

Keep records of all monitoring data required. 45CSR30-5.1.c.

Prepare and submit a CAM plan at permit renewal. 40CFR64.3(a), 64.3(b), 64.6(c)(2), 64.7(d), 64.7(e), 64.8(a), 64.9(b).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 006	Emission unit name: Abrasive Planer	List any control devices associated with this emission unit: Baghouse 009
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Abrasive planer with a design capacity of 2,500 linear ft/hr of lumber.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 05/01/1989	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 2,500 linear ft/hr lumber

Maximum Hourly Throughput: 2,500 linear ft of lumber	Maximum Annual Throughput: 21.9 x 10 ⁶ linear ft of lumber	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
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Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners: N/A
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	3.13	13.69
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application February 1995) and AP42 Table 10.3-1.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed twenty percent (20%) opacity. 45CSR7-3.1., 45CSR13 – Permit R13 – R13-1869 §B.3.

Visible emission standards shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty percent (40%) opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. 45CSR7-3.2., 45CSR13 – R13-1869 §B.3.

No particulate matter emissions in excess of the quantity specified in Table 45-7A of 45CSR7. 45CSR7-4.1., 45CSR13 – Permit R13-1869 §B.3.

Excess emissions may be permitted by the Director for up to ten (10) days due to unavoidable malfunction. 45CSR7-9.1., 45CSR13 – Permit R13-1869 §B.3.

Compliance assurance monitoring plan. 40CFR64

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct daily Method 22-like visible emission checks during periods of normal facility operation and appropriate weather conditions for a sufficient time interval not less than one (1) minutes. 45CSR30-5.1.c., 45CSR7A-2.1., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).

Response to excursions or exceedances. 45CSR30-5.1.c., 40CFR64.7(d).

Documentation of need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Monitor all applicable control devices to ensure the lowest fugitive particulate emissions are reasonably achievable. 45CSR30-5.1.c.

Develop and implement a Quality Improvement Plan if more than 5 excursions occur during a 6-month period. 45CSR30-5.1.c., 40CFR64.8(a).

Keep records of all monitoring data required. 45CSR30-5.1.c.

Prepare and submit a CAM plan at permit renewal. 40CFR64.3(a), 64.3(b), 64.6(c)(2), 64.7(d), 64.7(e), 64.8(a), 64.9(b).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 015	Emission unit name: Shredder	List any control devices associated with this emission unit: Cyclone 007 to Baghouse 009
--	--	--

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Shredder with a design capacity of 2,500 lb/hr of lumber scraps. Shredded material conveyed to fuel storage silo for use as fuel for boilers.

Manufacturer: Nordfab Systems	Model number: NC 1000	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 06/01/1994	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 2,500 lb/hr lumber scraps

Maximum Hourly Throughput: 2,500 lb/hr lumber scraps	Maximum Annual Throughput: 21.9 x 10 ⁶ lb shredded wood	Maximum Operating Schedule: 8760 hr/yr
--	--	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
---	--

Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners: N/A
---	--

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	3.75	16.43
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application February 1995).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or **construction permit** with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed twenty percent (20%) opacity. 45CSR7-1., 45CSR13 – Permit R13 – R13-1869 §B.3.

Visible emission standards shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty percent (40%) opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. 45CSR7-3.2., 45CSR13 – R13-1869 §B.3.

No particulate matter emissions in excess of the quantity specified in Table 45-7A of 45CSR7. 45CSR7-4.1., 45CSR13 – Permit R13-1869 §B.3.

Excess emissions may be permitted by the Director for up to ten (10) days due to unavoidable malfunction. 45CSR7-10., 45CSR13 – Permit R13-1869 §B.3.

40CFR64. Compliance assurance monitoring plan.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct daily Method 22-like visible emission checks during periods of normal facility operation and appropriate weather conditions for a sufficient time interval not less than one (1) minutes. 45CSR30-5.1.c., 45CSR7A-2.1., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).

Response to excursions or exceedances. 45CSR30-5.1.c., 40CFR64.7(d).

Documentation of need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).

Monitor all applicable control devices to ensure the lowest fugitive particulate emissions are reasonably achievable. 45CSR30-5.1.c.

Develop and implement a Quality Improvement Plan if more than 5 excursions occur during a 6-month period. 45CSR30-5.1.c., 40CFR64.8(a).

Keep records of all monitoring data required. 45CSR30-5.1.c.

Prepare and submit a CAM plan at permit renewal. 40CFR64.3(a), 64.3(b), 64.6(c)(2), 64.7(d), 64.7(e), 64.8(a), 64.9(b).

Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: Storage Bin	Emission unit name: Storage Bin	List any control devices associated with this emission unit: Full Enclosure
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

In ground storage bin with a design capacity of 19,200 ft³ of sawdust & wood chips.

Manufacturer: N/A	Model number: N/A	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: 01/01/1992	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 19,200 cubic feet of sawdust & wood chips

Maximum Hourly Throughput: 1.25 ton/hr	Maximum Annual Throughput: 2812.5 ton/year	Maximum Operating Schedule: 8760 hr/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners: N/A
---	--

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	3.75	16.43
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Best engineering estimate (R13 permit application February 1995) and AP42 Chapter 10.4 Table 10.4-2 (July 1979)</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or **construction permit** with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

No person shall cause, suffer, allow, or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter. Sources of fugitive matter associated with fuel burning units shall include, but no be limited to, the following: a. Stockpiling of ash or fuel either in the open or in enclosures such as silos; b. Transport of ash in vehicles or on conveying systems, to include spillage, tracking, or blowing of particulate matter from or by such vehicles or equipment; and c. Ash or fuel handling systems and as disposal areas. 45CSR2-5., 45CSR13 – Permit R13-1869 §§B.1. & B.2.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. The permittee shall also inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken as a result of the monthly inspections, the times the fugitive dust control system(s) were inoperable and any corrective actions taken. 45CSR30-5.1.c.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT G

Air Pollution Control Device Form

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 010	List all emission units associated with this control device. 001 Wood Fired Boiler #1 (Lambion Standby Boiler)
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Manufacturer: Not Available	Model number: Not Available	Installation date: 01/01/1984
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input checked="" type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	90%
PM10	100%	90%
PM2.5	100%	90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

6,725 acfm at 500 deg F and 0.14 PSIA;

Collected material to be disposed of with other refuse.

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** The pre-control potential to emit is below levels subject to CAM.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using a Method 22-like procedure.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 014	List all emission units associated with this control device. 002 Wood Fired Boiler #2 (Superior Main Boiler)
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Manufacturer: Zurn	Model number: MTSA 12/10-0 CYT-A-STD	Installation date: 01/01/1992
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input checked="" type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	90%
PM10	100%	90%
PM2.5	100%	90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

6,725 acfm at 500 deg F and 0.14 PSIA;
 10 tubes; tube diameter = 9" inlet and 6" outlet; tube length 32' inlet 25" outlet; pressure drip = 2.5 inches water
 Collected material to be disposed of with other refuse.

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using Method 22-like procedures.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number:
015

List all emission units associated with this control device.
002 Wood Fired Boiler #2 (Superior Main Boiler)

Manufacturer:
AFS Energy Systems

Model number:
AFS-30-6CYT

Installation date:
03/18/2011

Type of Air Pollution Control Device:

- | | | |
|---|--|---|
| <input type="checkbox"/> Baghouse/Fabric Filter | <input type="checkbox"/> Venturi Scrubber | <input checked="" type="checkbox"/> Multiclone |
| <input type="checkbox"/> Carbon Bed Adsorber | <input type="checkbox"/> Packed Tower Scrubber | <input type="checkbox"/> Single Cyclone |
| <input type="checkbox"/> Carbon Drum(s) | <input type="checkbox"/> Other Wet Scrubber | <input type="checkbox"/> Cyclone Bank |
| <input type="checkbox"/> Catalytic Incinerator | <input type="checkbox"/> Condenser | <input type="checkbox"/> Settling Chamber |
| <input type="checkbox"/> Thermal Incinerator | <input type="checkbox"/> Flare | <input type="checkbox"/> Other (describe) _____ |
| <input type="checkbox"/> Wet Plate Electrostatic Precipitator | | <input type="checkbox"/> Dry Plate Electrostatic Precipitator |

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	26%
PM10	100%	26%
PM2.5	100%	26%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

6,725 acfm at 450 deg F
 30 - 6" tubes; pressure drop = 3 - 3.5 inches water
 Collected material to be disposed of with other refuse.
 This multiclone controls 26% of the 10% not collected by Multiclone 014

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using Method 22-like procedures.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 009	List all emission units associated with this control device. 004 Rip Saw, 005 Planer, 006 Abrasive Planer, and 015 Shredder
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Manufacturer: Nordfab	Model number: NFS 5AJ/1BL	Installation date: 01/01/1992
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Type of Air Pollution Control Device:

<input checked="" type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
 Six (6) compartments containing 160 cotton bags;
 14,000 acfm at 70 deg F and 0.1 PSIA;
 pressure drop = 2.5 inches water
 Continuous automatic cleaning, one module at a time with reverse air.

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No
 If Yes, **Complete ATTACHMENT H**
 If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
 Visible emissions using Method 22-like procedures.

ATTACHMENT H

Compliance Assurance Monitoring (CAM) Plan Form

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): YES NO

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is **NOT** exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
 - d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
 - e. The PSEU is **NOT** an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has **NOT** yet been approved need to be addressed in this CAM plan submittal.

INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, **Only** address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for all PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU in order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	^b EMISSION LIMITATION or STANDARD	^c MONITORING REQUIREMENT
Main Boiler 002	Wood Fired Boiler	PM	Multiclone 014 and Multiclone 015	45CSR2-4.1.c. & R13-1869A (A.2); 3.41 lb/hr and 14.9 tpy	Daily Method 22-like emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device. Stack test once per permit term.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone. Weekly inspection of multiclone.

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for **EACH** indicator selected for **EACH** PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation: Main Boiler 002	4b) Pollutant: PM	4c) ^a Indicator No. 1: Stack test once per permit term..	4d) ^a Indicator No. 2: Visible Emissions
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:		Method 5 stack test	Visible emissions from the multiclone exhaust will be monitored daily using EPA Reference Method 22-like procedures.
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			The indicator level is no visible emissions.
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:		Approved stack test protocol per 45CSR2A	Measurements are made at the emission point and are indicative of good operation and maintenance of the multiclone.
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:		NA	NA
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Method 5 QA/QC procedures and 45CSR2A QA/QC procedures	The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.
^d Provide the <u>MONITORING FREQUENCY</u> :		Once per permit term or 5 years	One time per day during daylight and normal operations.
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:		Per 45CSR2A	Per Method 22
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:		6-hour average	6-hour average

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:
Main Boiler 002

6b) Regulated Air Pollutant:
PM

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Visible emissions was selected as a performance indicator for these control devices. Experience indicates that given proper operation and maintenance, there should be minimal (<10%) visible emissions when observed by individuals trained (but not necessarily certified) in Method 22-like observations. The presence of excessive visible emissions therefore indicates the possibility of a malfunction in one or both control devices.

8) **INDICATOR RANGES:** Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how EACH indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

Allegheny Wood selected minimal visible emissions when observed by an individual trained (but not necessarily certified) in Method 22-like observations. Minimal visible emissions was selected because excessive visible emissions are clearly indicative of a potential malfunction of the control equipment. The performance test once per permit term provides verification that the boiler and multiclones are operating within design parameters.

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*):

YES NO

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is **NOT** exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
 - d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
 - e. The PSEU is **NOT** an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has **NOT** yet been approved need to be addressed in this CAM plan submittal.

INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for all PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU in order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	^b EMISSION LIMITATION or STANDARD	^c MONITORING REQUIREMENT
Planer 005	Planer	PM	Baghouse 009	45CSR7-3.1; -3.2; -4.1; -10; R13-1869A (B.3)	Daily Method 22-like visible emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device.
Abrasive Planer 006	Abrasive Planer	PM	Baghouse 009	45CSR7-3.1; -3.2; -4.1; -10; R13-1869A (B.3)	Daily Method 22-like visible emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device.
Rip Saw 004	Rip Saw	PM	Baghouse 009	45CSR7-3.1; -3.2; 4.1; -10; R13-1869A (B.3)	Daily Method 22-like visible emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device.
Shredder 015	Shredder	PM	Baghouse 009	45CSR7-3.1; -3.2; -4.1; -10; R13-1869A (B.3)	Daily Method 22-like visible emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device.
<u>EXAMPLE</u> Boiler No 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1 c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(e).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for **EACH** indicator selected for **EACH** PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation: 004, 005, 006, 015	4b) Pollutant: PM	4c) ^a Indicator No. 1: Visible Emission Checks	4d) ^a Indicator No. 2:
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:		Visible emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures.	
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		The indicator level is no visible emissions. Five excursions in a 6-month reporting period	
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:		Measurements are made at the emission point and are indicative of good operation and maintenance of the baghouse.	
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:		NA	
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.	
^d Provide the <u>MONITORING FREQUENCY</u> :		One time per day during daylight and normal operations	
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:		Per Method 22	
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:		Data averaging is not permitted per 45CSR7. Each observation is for 15 seconds.	

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:
004, 005, 006, 015

6b) Regulated Air Pollutant:
PM

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Visible emissions was selected as a performance indicator for this control device. Experience indicates that given proper operation and maintenance, there should be no visible emissions when observed by individuals trained (but not necessarily certified) in Method 22-like observations. The presence of visible emissions therefore indicates the possibility of a malfunction in the control device.

8) **INDICATOR RANGES:** Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how EACH indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

Allegheny Wood selected no visible emissions when observed by an individual trained (but not necessarily certified) in Method 22-like observations. No visible emissions were selected because:

- It does not require qualitative assessment by the observer as to the degree of opacity
- Is clearly indicative of a potential malfunction of the control device

The selected QIP threshold for baghouse visible emissions is five excursions in a 6-month reporting period. This level is three percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.