#### PERMIT NO. 2493-027-0013-V-05-0

ISSUANCE DATE: 01/13/2025



#### **ENVIRONMENTAL PROTECTION DIVISION**

# Air Quality - Part 70 Operating Permit

Facility Name: Langboard OSB, Quitman

Facility Address: Hwy 84 East

Quitman, Georgia 31650, Brooks County

Mailing Address: P.O. Box 837

Quitman, Georgia 31643

Parent/Holding Company: Langdale Industries Facility AIRS Number: 04-13-027-00013

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

## The operation of an Oriented Strand Board (OSB) manufacturing facility.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Application TV-744362 signed on April 7, 2023, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **51** pages.

OF GEORGIA

Jeffrey W. Cown, Director

**Environmental Protection Division** 

Frey W. Cown,

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#### PART 1.0 FACILITY DESCRIPTION

#### 1.1 Site Determination

There are no other adjacent facilities or facilities under common control.

#### 1.2 Previous and/or Other Names

There are no previous names for this facility.

#### 1.3 Overall Facility Process Description

Mixed pine and limited amount of southern hardwoods are received by truck, debarked, cut to length, flaked, conveyed to wet flake metering bins, and dried. The wood flakes are dried in two single pass rotary flake dryers (Source ID Nos. P003 and P004), each with a maximum input rate of 75,000 pounds per hour (lb/hr). The drying heat is provided by one of two wood fired furnaces (i.e., Energy Systems, Source ID Nos. P001 and P002). The heat input capacity of each energy system is 160 million British thermal units per hour (MMBtu/hr), burning wood bark and other wood waste fuel recovered from the process, and controlled by an electrostatic precipitator (ESP) and nitrogen oxide (NOx) Abatement System. The Energy Systems receive exhaust gases from the dryers, board press (Source ID NO. P008) and blenders (Source ID No. P006) for reduction of VOC emissions.

The dried flakes are screened for fines removal (Source ID No. P005) and conveyed to blender metering bins. Particulate matter (PM) emissions from handling are controlled baghouse (Source ID No. C004). The flakes are then mixed with wax and phenol-formaldehyde resin in the blenders (Source ID No. P006). Flakes are then aligned in a continuous mat (Source ID No. P007). The mat is cut into sections, pressed at high temperature and pressure in a board press (Source ID No. P008) at a rate of up to 150,000 lb/hr and heated by thermal oil. The boards are then trimmed (Source ID No. P010), sanded (Source ID No. P009), graded, edge coated, and packaged for shipment. The plant can manufacture up to 500 million square feet per year (MMsf/yr) of OSB.

The facility submitted off permit application to remove the Fuel Storage Bin Vent Baghouse (C002) and install high efficiency cyclone in its place to operate in emergency (abort) situations. The cyclone is not considered as a control device. It will be inherent to the reject process.

#### PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

#### 2.1 Facility Wide Emission Caps and Operating Limits

2.1.1 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the entire facility any gases, which contain individual and total hazardous air pollutants (HAP), including but not limited to acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde in amounts in excess of 10 tpy and 25 tpy respectively during any twelve (12) consecutive months.

[Major Source MACT Avoidance Limit, 391-3-1-.02(2)(a)3]

#### 2.2 Facility Wide Federal Rule Standards

None applicable.

#### 2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

## PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

#### 3.1 Emission Units

<b>Emission Units</b>		Applicable		Air Pollution Control Devices	
ID No.	Description	Requirements/Standards	ID No.	Description	
P001	Energy System A (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(d) GA Rule 391-3-102(2)(g)	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System	
P002	Energy System B (160 MMBtu/hr heat input capacity, wood-fired combustion system)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(d) GA Rule 391-3-102(2)(g)	C001 C007	Electrostatic Precipitator (ESP) NOx Abatement System	
P003	Dryer System A (Single pass rotary flake dryer)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B	
P004	Dryer System B (Single pass rotary flake dryer)	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	C001 P001 P002	Electrostatic Precipitator Energy System A Energy System B	
P005	Fines/Flake Screening	GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	N/A	N/A	
P006	Flake Handling/Blending	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	C001 C004 P001 P002	Electrostatic Precipitator Flake Handling Baghouse Energy System A Energy System B	
P007	Forming Line	GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b).	C008	Forming Line Baghouse	
P008	Board Press	40 CFR 60, Subpart A 40 CFR 60, Subpart Db GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	P001 P002	Energy System A Energy System B	
P009	Sander Line	GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	C006	Sander Line Baghouse	
P010	Saw & Trim Line	GA Rule 391-3-102(2)(e) GA Rule 391-3-102(2)(b)	C003	Saw & Trim Baghouse	
P011	Fuel Relay & Storage Silo	GA Rule 391-3-102(2)(b) GA Rule 391-3-102(2)(e)	N/A	N/A	

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#### 3.2 Equipment Emission Caps and Operating Limits

3.2.1 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from Energy System A and Energy System B (Emission Unit ID Nos. P001 and P002), combined, nitrogen oxides (NOx) or carbon monoxide (CO) equal to or in excess of 55 lb/hr (30 day rolling average).

[PSD Avoidance Limits]

3.2.2 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the following process equipment, any gases that contain Particulate Matter (PM) in excess of the indicated rates:

[PSD Avoidance Limits]

Source and ID No.	Control Device and ID No	PM emissions limit
Forming (P007)	Baghouse (C008)	4.0 lbs/hr
Saw & Trim line (P010)	Baghouse (C003)	4.0 lbs/hr
Sander Line (P009)	Baghouse (C006)	4.0 lb/hr
Flake Handling/ Bleeding	Baghouse (C004)	4.29 lb/hr
(P006)		

- 3.2.3 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from the Energy System (Source ID Nos. P001 and P002) stack (Source ID No. S001), downstream of the electrostatic precipitator (Source ID No. C001), any emissions in excess of the indicated rates:
  - a. Particulate Matter (PM) in excess of 0.10 lb/MMBtu (filterable content only). [40 CFR 60 Subpart Db and PSD Avoidance Limit]
  - b. Total PM in excess of 0.14 lb/MMBtu (filterable and condensable content). [PSD Avoidance Limit]

#### 3.3 Equipment Federal Rule Standards

- 3.3.1 Energy System A and Energy System B (Emission Unit ID Nos. P001 and P002), each a wood-fired combustion system having 160 MMBtu/hr heat input capacity, are each subject to all applicable provisions of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart A "General Provisions" and Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units." Specifically, the Permittee shall not discharge, or cause the discharge, into the atmosphere, from either Energy System A or B, any emissions which exhibit opacity equal to or greater than 20 percent (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

  [40 CFR 60.43b(f) and 391-3-1-.02(2)(d)3]
- 3.3.2 The Permittee is allowed to burn, upon start up, plant and office waste (but not hazardous waste) in Energy System A and Energy System B (Source ID Nos. P001 and P002) up to 2

<sup>\*</sup> Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

percent of total fuel heat input. For purposes of this Permit, hazardous waste is defined in 40 CFR Part 261.3. In no case shall the Permittee fire a total of more than 1000 gallons of used oil during any twelve consecutive month period, in Energy Systems A and Energy System B.

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[391-3-1-.03(2)(c), 391-3-1-.02(6), and 40 CFR Part 261.3]

3.3.3 In accordance with the provisions of 40 CFR Part 279 – Standards for the Management of Used Oil, Subpart B – Applicability, Section 279.11 – Used oil specifications, the fuels produced from used oil by processing, blending, or other treatment may be used in the Energy System A and B (Source ID Nos. P001 and P002), provide the constituents and properties in the specification shown below are not exceeded:

Constituent / Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 degrees F minimum
PCBs	50 ppm maximum

Used oil, which does not meet these specifications, is considered "off-specification" used oil and may not be burned. These specifications shall not be met by diluting the used oil with other fuels. Mixtures of used oil and fuels or other fuel products are subject to this condition as used oil. Only onsite generated used oil shall be combusted. **Note that the Permittee shall not burn used oil during periods of startup or shut down.**[40 CFR 279.11]

3.3.4 The Permittee is allowed to dispense gasoline on-site for small vehicles and lawn maintenance engines.

[40 CFR 63, Subpart CCCCCC]

3.3.5 The Permittee shall comply with all the applicable provisions of 40 CFR 63 Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (GDF), for all subject equipment. In particular, for facilities with monthly throughput of 100,000 gallons of gasoline or more, the Permittee shall comply with the following requirements:

[40 CFR 63.11116(a), 40 CFR 63.11117(b & c), 40 CFR 63.11118]

a. The Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- i. Minimize gasoline spills,
- ii. Clean up spills as expeditiously as practicable,
- iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use (Portable gasoline containers that meet the requirements of 40 CFR 59, subpart F, are considered acceptable for compliance with this requirement),

- iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- b. Except for gasoline storage tanks with a capacity of less than 250 gallons, The Permittee shall only load gasoline into storage tanks at this facility by utilizing submerged filling. The applicable distances in items i. and ii. below shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank.
  - i. Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.
  - ii. Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank.
  - iii. Submerged fill pipes not meeting the specifications of items (i) or (ii) above are allowed if the Permittee can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Division's representative during the course of a site visit.
- c. Except as provided in paragraph d. below, the Permittee shall install and operate a vapor balance system on gasoline storage tanks. Additionally, the Permittee must meet the requirements of each management practice in Table 1 to 40 CFR 63 Subpart CCCCCC that applies to a GDF.
- d. The emission sources listed in items i. through iii. below are not required to comply with the control requirements in paragraph c. of this Condition but must comply with the requirements in paragraph b. of this Condition.
  - i. Gasoline storage tanks with a capacity of less than 250 gallons that are constructed after January 10, 2008.
  - ii. Gasoline storage tanks with a capacity of less than 2,000 gallons that were constructed before January 10, 2008
  - iii. Gasoline storage tanks equipped with floating roofs, or the equivalent.
- e. Cargo tanks unloading at GDF must comply with the management practices in Table 2 to 40 CFR 63 Subpart CCCCCC.

#### 3.4 **Equipment SIP Rule Standards**

- 3.4.1 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from each of Energy System A and Energy System B (Source ID Nos. P001 and P002) which:
  - Contain fly ash and/or other particulate matter in amounts equal to or exceeding the rate a. derived from  $P = 0.5(10/R)^{0.5}$  where R equals heat input rate in million BTU per hour and P equals the allowable emission rate in pounds per million BTU. [391-3-1-.02(2)(d)2(ii)]

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- b. Exhibit visible emissions, the opacity of which is equal to or greater than 20 percent except for one six minute period per hour of not more than 27 percent opacity. [391-3-1-.02(2)(d)3.]
- 3.4.2 The Permittee shall not burn fuel containing more than 3.0 percent sulfur, by weight, in the Energy System (Source ID No. P001 and/or P002). [391-3-1-.02(2)(g)]
- 3.4.3 The Permittee shall not cause, let, suffer, permit or allow the rate of emissions from each manufacturing process, including Dryer Systems A and B (Source ID Nos. P003 and P004), Fines/Flake Screening (Source ID No. P005), Flake Handling/Blending (Source ID No. P006), Forming Line (Source ID No. P007), Board Press (Source ID No. P008), Sander Line (Source ID No. P009), Saw & Trim Line (Source ID No. P010), and Fuel Relay and Storage Silo (Source ID No. P011), particulate matter (PM) in total quantities equal to or exceeding the allowable rate calculated as follows:

[391-3-1-.02(2)(e)1(i)]

- For equipment put in operation or extensively altered after July 2, 1968: a.
  - i.  $E = 4.1P^{0.67}$ , for process input weight rate up to and including 30 tons per hour:
  - $E = 55P^{0.11}$  40, for process input weight rate in excess of 30 tons per hour. ii.

Where:

E equals the allowable particulate emissions rate in pounds per hour, and

P equals the dry process input weight rate in tons per hour.

- 3.4.4 The Permittee shall not cause, let, suffer, permit or allow the emissions into the atmosphere from the stack of Dryer Systems A and B (Source ID Nos. P003 and P004), Fines/Flake Screening (Source ID No. P005), Flake Handling/Blending (Source ID No. P006), Forming line (Source ID No. P007), Board Press (Source ID No. P008), Sander Line (Source ID No. P009), Saw & Trim Line (Source ID No. P010), and Fuel Relay and Storage Silo (Source ID No. P011), any gases which exhibit visible emissions, the opacity of which is equal to or greater than forty (40) percent, unless otherwise specified.

  [391-3-1-.02(2)(b)1]
- 3.4.5 The Permittee shall take all reasonable precautions to prevent fugitive dust from becoming airborne from any of the manufacturing process equipment or any other operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following:

[391-3-1-.02(2)(n)]

- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 3.4.6 The Permittee shall not discharge or cause the discharge into the atmosphere from the manufacturing process equipment, or any other operation, process, handling, transportation or storage facility or any other dust source, any fugitive dust, which exhibits opacity equal to or greater than 20 percent.

  [391-3-1-.02(2)(n)]

# 3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

3.5.1 The Permittee shall ensure that the emissions from each of the following sources are routed through its respective air pollution control device (APCD).

[PSD Avoidance and HAP Major Source Avoidance]

a.

The combustion flue gas from the Energy System (Source ID No. P001 and/or No. P002) shall be vented to the electrostatic precipitator (Source ID No. C001) when the

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- Energy System is in operation.
- b. The process emissions from Dryer System A and Dryer System B (Source ID Nos. P003 and P004), Flake Handling/Blending (Source ID No. P006), and Board Press (Source ID No. P008) shall be vented to the Energy System (Source ID Nos. P001 and P002) when that emission unit is in operation.
- 3.5.2 Routine maintenance shall be performed on all air pollution control equipment. Maintenance records shall be recorded in a permanent form suitable and available for inspection by the Division. The records shall be retained for at least five years following the date of such maintenance.

[391-3-1-.02(2)(a)10]

- 3.5.3 The Permittee shall maintain an inventory of filter bags such that an adequate supply of bags is on hand to replace any defective bags in any of the baghouse(s) (APCD ID Nos. C003, C004, C006 and C008).

  [391-3-1-.03(2)(c)]
- 3.5.4 The Permittee shall operate each air pollution control device, including the electrostatic precipitator (Source ID No. C001) and the baghouses (Source ID Nos. C003, C004, C006 and C008), at all times that its associated emission unit(s) is being operated.

  [391-3-1-.03(2)(c)]
- 3.5.5 The Permittee shall operate a capture system on the Board Press and Board Cooling area at all times that the associated emission unit(s) is being operated. The capture system shall meet the Method 204 criteria for a permanent total enclosure (PTE) or shall achieve capture efficiency greater than or equal to 95 percent.

  [391-3-1-.02(6)(b)1]

#### PART 4.0 REQUIREMENTS FOR TESTING

#### 4.1 General Testing Requirements

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division.

  [391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.

  [391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
  - a. Method 1 shall be used for selection of sampling site and number of traverse points.
  - c. Method 2 shall be used for stack gas flow rate.
  - d. Method 3 or 3A shall be used for gas molecular weight.
  - e. Method 3B shall be used for the determination of emission rate correction factor or excess air. Method 3A may be used as an alternative.
  - f. Method 4 shall be used for moisture determination.
  - g. Method 5 or Method 17, as applicable, shall be used for the determination of the Particulate Matter (filterable content) concentration for sources other than the dryers, blending process, and the board press.
  - h. Method 5 in conjunction with Method 202, shall be used for the determination of Total Particulate Matter (filterable and condensable) concentrations for the dryers, blending process, and the board press.
  - i. Method 7 or 7E shall be used for the determination of nitrogen oxide concentrations.
  - j. Method 9 and the procedures of Section 1.3 of the above referenced document shall be used for the determination of opacity of stack emissions.
  - k. Method 10 shall be used for the determination of carbon monoxide concentrations.

1. Method 320, or an equivalent NCASI Method (such as ISS/FP-A105.01 or IM/CAN/WP-99.02) or ASTM Method (such as ASTM D6348-03), shall be used for the determination of Hazardous Air Pollutant concentrations including acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde.

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- m. Method 19 shall be used, when applicable, to convert particulate matter and nitrogen oxides concentrations (i.e., grains/dscf for PM or ppm for gaseous pollutants), as determined using other methods specified in this section, to emission rates (i.e., lb/MMBtu).
- n. Method 204 shall be used to establish criteria for and verification of a permanent or temporary total enclosure.
- o. The procedures described in U.S. Environmental Protection Agency document EPA600/2-80-018 (Samplers and Sampling Procedures for Hazardous Waste Streams) shall be used to obtain the sample of used oil, in order to demonstrate compliance with Condition 3.3.3.
- p. Method 6010B, contained in the Test Methods for Evaluating Solid Waste (SW-846) methods manual of U.S. Environmental Protection Agency's Office of Solid Waste, shall be used to determine concentrations of arsenic, cadmium, chromium, and lead in the used oil in order to demonstrate compliance with Condition 3.3.3.
- q. ASTM D808 shall be used to determine total halogens in the used oil in order to demonstrate compliance with Condition 3.3.3.
- r. ASTM D 93 shall be used to determine flash point for the used oil in order to demonstrate compliance with Condition 3.3.3.

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable.

[391-3-1-.02(3)(a)]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard. [391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

#### 4.2 **Specific Testing Requirements**

4.2.1 The Permittee shall, upon request, determine compliance with the nitrogen oxides (NOx) emission limitation in Condition 3.2.1 for the Energy System (Source ID Nos. P001 and P002), through the use of a 30-day performance test using the Continuous Emissions Rate Monitoring System (CERMS) required by Condition 5.2.1. During periods when performance tests are not requested, NOx emissions data collected by the CERMS shall be used to calculate a 30-day rolling average emission rate on a daily basis which shall be used to prepare the report required by Condition 6.1.4.

A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all the hourly NOx emission data for the preceding 30 steam generating unit operating days. [391-3-1-.02(6)(b)1]

- 422 The Permittee shall conduct performance tests on the Energy System (Source ID Nos. P001 and P002), at 12-month intervals, for the following pollutants:
  - a. Filterable PM to comply with condition 3.2.3.a.
  - Total PM (filterable and condensable content) to comply with condition 3.2.3.b. b.

During each testing, the Permittee shall record both the total secondary voltage (kV) and current (ma) to calculate the total secondary power (watt). The Permittee shall establish, from data collected during the performance test, the representative total power for each ESP at which compliance with the particulate matter emissions limit is achieved in order to define excursions for Condition 6.1.7 c.

Should the PM emissions for the Energy System be fifty (50) percent or less of the emissions limit contained in Condition 3.2.3.a and 3.2.3.b, the testing may be conducted at 24 month intervals until such time that an emissions test indicates an emission rate greater than 50 percent of that limit, at which time testing shall revert to 12 month intervals. [391-3-1-.02(6)(b)1(i)]

- 4.2.3 The Permittee may be required to perform additional performance testing if the fuel material is changed. The results of any such performance test(s) shall be submitted to the Division within 30 days of the completion of testing. [391-3-1-.02(6)(b)1(i)]
- 4.2.4 The Permittee shall, upon request, determine compliance with the carbon monoxide (CO) emission limitation in Condition 3.2.1, through the use of a 30-day performance test using the CERMS required by Condition 5.2.1. During periods when performance tests are not requested, CO emissions data collected by the CERMS shall be used to calculate a 30-day rolling average emission rate on a daily basis which shall be used to prepare the report required by Condition 6.1.4. A new 30-day rolling average emission rate is calculated each steam generating unit operating day, as the average of all the hourly CO emission data for the preceding 30 steam generating unit operating days.

[391-3-1-.02(6)(b)1]

4.2.5 The Permittee shall conduct performance tests at the outlet of the Energy System (Source ID Nos. P001 and P002) to determine individual and total HAP, including acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde emissions, while the process emissions from Dryer Systems A and B (Source ID Nos. P003 and P004), Blending (Source ID No. P006) and Board Press (Source ID No. P008), are vented to the Energy System (Source ID Nos. P001 and P002). at least once per 48 months in order to assure that the HAPs, including acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde, emission factors established during each performance tests remain accurate.

[391-3-1-.02(2)(a)3 and 391-3-1-.02(6)(b)]

- 4.2.6 For the purposes of Conditions 4.2.1, 4.2.2, 4.2.4, and 4.2.5, an operating day is defined as the 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the Energy System. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

  [40 CFR 60.41b]
- During each performance test required by Condition 4.2.5, the Permittee shall measure and record the combustion zone temperatures for each Energy System (Source ID Nos. P001 and P002). These measurements shall be used to establish the minimum temperature at which each Energy System operates while demonstrating compliance with the HAP emission limit of Condition 2.1.1. Within 45 days of the completion of testing, the Permittee shall submit a report to the Division containing the emissions test results, the temperature measurements recorded during the testing, and the temperatures established. The value for each minimum Energy System temperature, to be used to establish the lower threshold for reporting the excursions described in Condition 6.1.7.c.iv, shall be the average temperature minus 50 degrees Fahrenheit.

  [40 CFR 70.6(a)(3)(i) and 391-3-1-.02(6)(b)1(i)]
- 4.2.8 The Permittee shall, use the monitoring systems required by Condition 5.2.3, acquire pressure drop data across that baghouse. Using data from performance tests that demonstrate compliance with the applicable PM emissions limit, the Permittee shall determine the arithmetic average of the pressure drop for each baghouse and submit to the Division a report containing the pressure drop data and the arithmetic averages. The report shall be submitted to the Division within 60 days of completion of the testing.

  [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

#### PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

#### **5.1** General Monitoring Requirements

5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service.

[391-3-1-.02(6)(b)1]

#### **5.2** Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

  [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
  - a. A Continuous Emissions Rate Monitoring System (CERMS) for measuring and recording nitrogen oxides (NOx) concentration and gas flow rate from the Energy System (Source ID Nos. P001 and P002). The one-hour average NOx emission rates measured by the system shall be expressed in pounds per hour.
  - b. A CERMS for measuring and recording carbon monoxide (CO) concentration and gas flow rate from the Energy System (Source ID Nos. P001 and P002). The one-hour average CO emission rates measured by the system shall be expressed in pounds per hour.
  - c. A Continuous Opacity Monitoring System (COMS) for measuring and recording the opacity of the visible emissions from the Energy System (Source ID Nos. P001 and P002). The COMS shall be installed on the stack (Stack Code S001) downstream of the electrostatic precipitator (Source ID No. C001).

    [391-3-1-.02(6)(a)2(iii)]

The NOx CERMS and CO CERMS shall each comply with Performance Specification 6 (PS 6) contained in Appendix B of the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The Permittee shall conduct Relative Accuracy tests at approximately 12-month intervals on each CERMS, using the procedures of PS 6.

The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Temperature monitoring system(s) for the measurement of combustion zone temperatures of Energy Systems A and B (Emission Units ID Nos. P001 and P002). Devices installed shall have an accuracy of  $\pm$  1% (°F) of the temperature being measured.

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- b. Secondary amperage (in milliamps) and voltage (in kilovolts) for each field of the electrostatic precipitator (Source I.D. No. C001) controlling the Energy Systems (Source ID Nos. P001 and P002). Records of the total power determined per Condition No. 5.2.9, in either hard copy or an electronic format, will be considered adequate for record keeping.
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

a. Pressure drop across each baghouse (Source ID Nos. C003, C004, C006 and C008) which controls emissions from Flake Handling/Blending (Source ID No. P006), Forming Line (Source ID No. P007), Sander Line (Source ID No. P009) and Saw & Trim Line (Source ID No. P010). Data shall be recorded in accordance with the requirements of Condition 5.2.6.

The device used to monitor pressure drop across baghouse (Source ID No. C008) shall be certified by the manufacturer to be accurate within  $\pm 250$  pascals ( $\pm 1$  inch water gauge) and shall be calibrated on an annual basis in accordance with the manufacturer's instructions.

- 5.2.4 The Permittee shall periodically perform a check to determine if visible emissions are being emitted from any baghouse (Source ID Nos. C003, C004, C006 and C008) which controls the emissions from Flake Handling/Blending (Source ID P006), Forming Line (Source ID No. P007), Sander Line (Source ID No. P009) and Saw & Trim Line (Source ID No. P010) The check shall be conducted at least once for each day or portion of each day of operation of the respective emission unit(s) the control device is associated with. A record of this check, suitable for inspection or submittal, shall be retained in a daily visible emissions (VE) log. The check shall be conducted using the following procedure:

  [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
  - a. Determine, in accordance with the procedures specified in paragraph d of this condition, if visible emissions are present at the discharge point to the atmosphere from each of the sources and record the results in the daily (VE) log. For sources that exhibit visible emissions, the Permittee shall comply with paragraph b or c of this condition.
  - b. For each source determined to be emitting visible emissions, the Permittee shall determine whether the emissions equal or exceed the opacity action level using the procedure specified in paragraph d. of this condition, except that the person performing the determination shall have received additional training acceptable to the Division to

recognize the appropriate opacity level and the determination shall cover a period of three minutes. For a baghouse, the opacity action level shall be any occurrence of visible emissions. The results shall be recorded in the daily (VE) log. For sources that exhibit visible emissions of greater than or equal to the opacity action level, the Permittee shall comply with paragraph c. of this condition.

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- c. For each source that requires action in accordance with paragraphs a or b of this condition, the Permittee shall determine the cause of the visible emissions and correct the problem in the most expedient manner possible. The Permittee shall note the cause of the visible emissions, the pressure drop, any other pertinent operating parameters, and the corrective action taken in the maintenance log.
- d. The person performing the determination shall stand at a distance of at least 15 feet which is sufficient to provide a clear view of the plume against a contrasting background with the sun in the 140° sector at his/her back. Consistent with this requirement, the determination shall be made from a position such that the line of vision is approximately perpendicular to the plume direction. Only one plume shall be in the line of sight at any time when multiple stacks are in proximity to each other.
- 5.2.5 Within 60 days of the issuance of this permit renewal, the Permittee shall submit a current version of the Preventive Maintenance Program for the baghouses identified in condition 5.2.7 as controlling a PSEU(s) subject to the provision of the 40 CFR 64. The program shall include maintenance action levels indicative of proper baghouse maintenance. As a minimum, the submittal shall include maintenance action levels for all operational and maintenance checks required by Condition 5.2.3 and 5.2.7. Any change to the Preventive Maintenance Program shall be submitted 30 days prior to implementation. Any changes to the program shall be subject to review and, if necessary to assure compliance, modification by the Division.

[391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i) and 40 CFR 64]

- 5.2.6 The Permittee shall implement an approved Preventative Maintenance Program for each baghouse (Source Nos. C003, C004, C006 and C008) to assure that the provisions of Condition 8.17.1 are met. The program shall be subject to review and, if necessary to assure compliance, modification by the Division and shall include the pressure drop ranges that indicate proper operation for each baghouse. At a minimum, the following operation and maintenance checks shall be made on at least a weekly basis, and a record of the findings and corrective actions taken shall be kept in a maintenance log:

  [391-3-1-.02(6)(b)1. and 40 CFR 70.6(a)(3)(i)]
  - a. Record the pressure drop across each baghouse and ensure that it is within the appropriate range.
  - b. For baghouses equipped with compressed air cleaning systems, check the system for proper operation. This may include checking for low pressure, leaks, proper lubrication, and proper operation of timer and valves.

c. For baghouses equipped with reverse air cleaning systems, check the system for proper operation. This may include checking damper, bypass, and isolation valves for proper operation.

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- d. For baghouses equipped with shaker cleaning systems, check the system for proper operation. This may include checking shaker mechanism for loose or worn bearings, drive components, mounting; proper operation of outlet/isolation valves; proper lubrication.
- e. Check dust collector hoppers and conveying systems for proper operation.
- 5.2.7 The Permittee shall, for each day or portion of each day of operation of the OSB dryers, determine 12-hour block averages of combustion zone temperatures for the combustion zones of the Energy System (Source ID Nos. P001 and P002). A 12-hour block average shall be calculated using data points that represent each 15-minute period that any dryer is in operation. For the purposes of this condition, a 15-minute period means any one of the four equal parts of a 60-minute period commencing on the hour. A 12-hour block shall be defined as any one of the two equal parts of the 24-hour period between 12:00 midnight and the following midnight.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

5.2.8 The Permittee shall determine 1- hour averages for secondary volts and secondary current using data from the continuous monitoring system required by Condition 5.2.2. The 1-hour averages shall be based on more than 30 minutes of the Energy Systems (Source ID Nos. P001 and P002) operating time and include at least two data points, with each data point representing a 15-minute period. The 1-hour averages shall be used to calculate total ESP power according to the following equation:

$$P_t = \sum_{i=1}^n V_i I_i$$

Where: P<sub>T</sub>=Total ESP power (Watts)

V<sub>i</sub>= secondary voltage (kV) in ESP field i

I<sub>i</sub>=secondary current (ma) in ESP field i

n= Total number of fields in ESP

i=ith field in ESP (i.e., i=1 to n)

- 5.2.9 The Permittee shall analyze a sample of on-site generated used oil burned at the facility once per year or more often upon written request by the Division, this sample will be representative of any used oil to be burned in the Energy System A and Energy System B (Source ID Nos. P001 and P002). The sample(s) shall be obtained and analyzed using the following methods: [391-3-1-.02(6)(b)1]
  - a. The procedures described in U.S. Environmental Protection Agency document EPA-600/2-80-018 (Samplers and Sampling Procedures for Hazardous Waste Streams) shall be used to obtain the sample.

b. Method 6010B, contained in the SW-846 method manual of U.S. Environmental Protection Agency's Office of Solid Waste, shall be used to determine concentrations of arsenic, cadmium, chromium, and lead.

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- c. SW-846 Method 9077 C shall be used to determine total halogens.
- d. ASTM D 93 shall be used to determine flash point.
- e. Polychlorinated Biphenyls (PCB) shall be determined using the test method described in U.S. Environmental Protection Agency document EPA-600/4-81-045 (The determination of Polychlorinated Biphenyls in Transformer Fluid and waste Oil).
- 5.2.10 The following pollutant specific emission unit(s) (PSEU) is/are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

Emission Unit	Pollutant
Energy System Unit A (Source ID No. P001)	PM
Energy System Unit B (Source ID No. P002)	PM
Dryer System A (Source ID No. P003)	PM, VOC and HAP
Dryer System B (Source ID No. P004)	PM, VOC and HAP
Flake Handling/Blending (Source ID No. P006)	PM, VOC and HAP
Board Press (Source ID No. P008)	VOC and HAP

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

5.2.11 The Permittee shall comply with the performance criteria listed in the table below for the PM emissions from the Energy Systems (Source ID Nos. P001 and P002) and Dryer Systems (Source ID Nos. P003 and P004).

[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Specify Indicator No. 1(i.e. Pressure Drop, NOx emissions, etc.)	Indicator No. 2 [add or delete additional indicator columns as necessary]
A. Data Representativeness [64.3(b)(1)]	Appropriate monitoring equipment installed in the ESP per the manufacturer's design.	Appropriate monitoring equipment installed in the ESP per the manufacturer's design.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	Confirm that the ammeter reads zero when the ESP is not operating, at least semiannually. Perform all manufacturer's recommended maintenance.	Confirm that the voltmeter reads zero when the ESP is not operating, at least semiannually. Perform all manufacturer's recommended maintenance.

C.	QA/QC Practices and Criteria [64.3(b)(3)]	Operators check the data for completeness, legibility, reasonableness, and accuracy on a routine basis; Performance testing is conducted at 12 to 24 month intervals to ensure system is operating properly.	Operators check the data for completeness, legibility, reasonableness, and accuracy on a routine basis; Performance testing is conducted at approximately 12 to 24 month intervals to ensure system is operating properly.
D.	Monitoring Frequency [64.3(b)(4)]	Secondary amperage is recorded every 15 minutes and a 1 hour average is calculated for each hour of operation.	Secondary voltage is recorded every 15 minutes and a 1 hour average is calculated for each hour of operation.
E.	Data Collection Procedures [64.3(b)(4)]	Records of parametric monitoring, required maintenance, and corrective actions will be maintained at the mill site, either in organized paper files or electronically. The data will be retained for the period of time specified in the permit.	Records of parametric monitoring, required maintenance, and corrective actions will be maintained at the mill site, either in organized paper files or electronically. The data will be retained for the period of time specified in the permit.
F.	Averaging Period [64.3(b)(4)]	3-hour period during which average total power for the ESP (sum of P=VI for each field) is less than 75% of the established average.	3-hour period during which average total power for the ESP (sum of P=VI for each field) is less than 75% of the established average.

5.2.12 The Permittee shall comply with the performance criteria listed in the table below for the volatile organic compounds and total hazardous air pollutants (HAP) emissions from the Dryer Systems A and B (Source ID Nos. P003 and P004), Flake Handling/Blending (Source ID No. P006), and Board Press (Source ID No. P008).

[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Energy System Combustion Zone Temperature	Indicator No. 2 Board Press Capture Efficiency
A. Data Representativeness [64.3(b)(1)]	Appropriate thermocouples installed in the combustion chamber; per the manufacturer's design, the thermocouples will be accurate to +/- 1%.	Board Press enclosure openings are minimized such that at least 95% of gaseous emissions are routed to the Energy System for destruction
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	Calibrations performed in accordance with the manufacturer's recommendations.	Not Applicable.
C. QA/QC Practices and Criteria [64.3(b)(3)]	Operators check the data for completeness, legibility, reasonableness, and accuracy on a routine basis.	Not Applicable.
D. Monitoring Frequency [64.3(b)(4)]	Combustion zone temperature is recorded every 15 minutes, and a 12-hour block average is calculated twice per day	Daily

E.	Data Collection Procedures [64.3(b)(4)]	Records of parametric monitoring required maintenance, and corrective actions will be maintained at the mill site, either in organized paper files or electronically. The data will be retained for the period of time specified in the permit.	Records of daily checks of natural draft openings will be maintained at the mill site, either in organized paper files or electronically. The data will be retained for the period of time specified in the permit
F.	Averaging Period [64.3(b)(4)]	12-hour block average during which combustion zone temperature drops below the established minimum	Not Applicable.

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5.2.13 The Permittee shall comply with the performance criteria listed in the table below for the particulate matter emissions from Flake Handling/Blending (Source ID No. P006), which is equipped with a baghouse (Source ID No. C004) and has potential pre-control emissions that are equal to or greater than 100 percent of the amount required for a source to be classified as a major source.

[40 CFR 64.6(c)(1)(iii)]

Performance Criteria [64.4(a)(3)]	Indicator No. 1 Visible Emissions	Indicator No. 2 Baghouse Inspection
A. Data Representativeness [64.3(b)(1)]	Visible emissions will be observed at the baghouse exhaust stack.	Preventative Maintenance Plan that includes checks as specified by Condition 5.2.6.
B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)]	Not Applicable.	Not Applicable.
C. QA/QC Practices and Criteria [64.3(b)(3)]	The observer shall have received training acceptable to the Division to recognize the appropriate opacity.	Specific QA/QC practices and criteria will be specified in the Preventive Maintenance Plan required by Condition 5.2.6.
D. Monitoring Frequency [64.3(b)(4)]	Once per day or portion of day that the emission unit is operated.	At least once each week.
E. Data Collection Procedures [64.3(b)(4)]	Visual readings as prescribed in Condition 5.2.5. Readings will be retained in a daily visible emissions (VE) log suitable for inspection or submittal to the Division.	Manual readings and data logging.
F. Averaging Period [64.3(b)(4)]	Not Applicable.	Not Applicable.

The Permittee shall periodically check the press room enclosure to verify that natural draft openings are maintained as specified in the initial compliance testing for capture efficiency. The Permittee will verify that required openings are properly set, that other doors, vents and windows are sealed and that air flow at the openings is inward (toward the enclosure). The checks shall be conducted and recorded once each day or portion of each day of press operation. A checklist or other similar log may be used for this purpose. Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible.

[391-3-1-.03(2)(c)]

5.2.15 For each gasoline cargo and storage tank located at an existing gasoline dispensing facility (GDF), the Permittee shall keep applicable records and submit reports required by 40 CFR 63 Subpart CCCCCC, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities, for all subject equipment, and, all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.11115(a & b), 40 CFR 63.11124(b)(4 &5)]

#### PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS

#### 6.1 General Record Keeping and Reporting Requirements

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry. [391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]
- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

- 6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken. [391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]
- 6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]
  - a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
  - b. Total process operating time during each reporting period.
  - c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any

of each time period of occurrence.

conversion factors used, and the date and time of the commencement and completion

- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- 6.1.5 Where applicable, the Permittee shall keep the following records: [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]
  - a. The date, place, and time of sampling or measurement;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
- 6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
  - [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]
  - a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

- None required to be reported in accordance with Condition 6.1.4.
- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
  - i. Any 30-day rolling period when the average NOx or CO emission rate from the Energy System (Source ID Nos. P001 and P002) exceeds 55 pounds per hour.
  - ii. Any six-minute period during which the average opacity, measured and recorded in accordance with Condition No. 5.2.1.c, exceeds 20 percent, except for one 6-minute period per hour of not more than 27 percent opacity, for the Energy System (Source ID Nos. P001 and P002).
  - iii. Any month during which the total amount of heat input, from waste fuel oil, office waste, and plant waste, calculated in accordance with Condition 6.2.8, exceeded 2 percent of the total heat input to Energy System Units A and B (Source ID Nos. P001 and P002).
  - iv. Any twelve-month period during which the waste oil burned in Energy System Units A and B (Source ID Nos. P001 and P002), calculated in accordance with Condition 6.2.8, exceeded 1000 gallons.
  - v. Any twelve-consecutive month period during which the emission rate for any individual HAP, including acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde, calculated as per Condition 6.2.6, is equal to or greater than 10 tons.
  - vi. Any twelve-consecutive month period during which the combined total HAP emission rate, calculated as per Condition 6.2.6 is equal to or greater than 25 tons.
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

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- i. Any failure to carry out an inspection required per Condition 5.2.4.
- ii. Any adverse condition discovered by a weekly inspection, as required in Condition 5.2.4, of any baghouse (Source ID Nos. C003, C004, C006 and C008).
- iii. Any visible emissions from any baghouse (Source ID Nos. C003, C004, C006 or C008), which occurs for two consecutive determinations, done to comply with Condition 5.2.5.
- iv. Any 12-hour block average of combustion zone temperature for Energy System Units A or B (Source ID Nos. P001 or P002) that is less than the temperature established per Condition 4.2.7.
- v. Each three-hour period during which the average total power for the electrostatic precipitator (Source ID No. C001), as determined in accordance with Conditions 5.2.2 and 5.2.9, is less than 75 percent of the value determined and reported in accordance with Conditions 4.2.2. For the purpose of this Condition, each clock hour begins a new three-hour period.
- vi. Any two consecutive determinations made, per Condition 5.2.15, in which an inward air flow toward the enclosure could not be established.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
  - i. The results of the analyses of used oil from on-site sources, as specified in Condition 5.2.10. Include the on-specification parameters listed in Condition 3.3.3.
  - ii. The quantity of (1) wood, (2) plant and office waste (non-hazardous waste), and (3) used oil (including hydraulic oil), fired in Energy System Units A and B (Source ID Nos. P001 and P002) on a monthly basis.

#### 6.2 Specific Record Keeping and Reporting Requirements

- 6.2.1 The Permittee shall maintain the following records for each unit-operating day for the Energy System (Source ID Nos. P001 and P002). The data collected for items a, c, e and h shall be submitted along with the quarterly report required by Condition 6.1.4.

  [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
  - a. Calendar date.
  - b. The average hourly nitrogen oxides emission rates (in pounds per hour) measured or predicted.

c. The 30-day average nitrogen oxides emission rates (in pounds per hour) calculated at the end of each unit-operating day from the measured or predicted hourly nitrogen oxides emission rates for the preceding 30 unit-operating days.

- d. The average hourly carbon monoxide emission rates (in pounds per hour) measured or predicted.
- e. The 30-day average carbon monoxide emission rates (in pounds per hour) calculated at the end of each unit-operating day from the measured or predicted hourly carbon monoxide emission rates for the preceding 30 unit-operating days.
- f. Identification of the unit operating days when the calculated 30-day average nitrogen oxides and/or carbon monoxide emission rates are in excess of the equipment emission caps and operating limits specified in Condition 3.2.1; include the reasons for such excess emissions as well as a description of the corrective actions taken.
- g. Identification of the unit operating days for which pollutant data was not obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
- h. Identification of the times when emissions data were excluded from the calculation of average emission rates and the reasons for excluding the data.
- i. Identification of the "F" factor used for calculations, the method of its determination, and the type of fuel combusted.
- j. Identification of the times when the pollutant concentration exceeded the full span of any continuous monitoring system.
- k. Description of any modification to any continuous monitoring system that could affect the ability of that continuous monitoring system to comply with Performance Specifications 2 or 3.
- 6.2.2 The Permittee shall record the production of board by the Board Press (Source ID No. P008), in square feet, on a 3/8-inch basis, for each calendar day of operation of the press. [391-3-1-.03(2)]
- 6.2.3 The Permittee shall maintain records describing the routine maintenance performed on all air pollution control equipment.

  [391-3-1-.03(2)]
- 6.2.4 The Permittee shall maintain records of the periods of time in which emissions from Dryer System A or B (Source ID No. P003 and P004), Blending (Source ID No. P006), or Board Press (Source ID No. P008) are not being controlled by the Energy System. The Permittee shall note the date, time, and duration that waste gas emissions from any above of these mentioned emission units, while in operation, were not vented through the Energy System. These records shall be available for inspection or submittal to the Division upon request. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2.5 The Permittee shall use HAP emission factors determined during last Division-approved performance tests, and the monthly board press production records required in Condition No. 6.2.2, to calculate total monthly emissions of each hazardous air pollutant (HAP), including acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The Permittee shall notify the Division in writing if the emission of any one pollutant exceeds 0.83 tons, or if the total of all HAP emissions exceeds 2.08 tons, during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition No. 2.1.1.

[391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]

- 6.2.6 The Permittee shall use the monthly emission rates, calculated as per Condition 6.2.5, to calculate the 12-month rolling totals, for individual HAP pollutants and for total HAP pollutants, for each month in the reporting period. Each 12-month rolling total shall be included in the quarterly report specified in Condition No. 6.1.4. [391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]
- 6.2.7 The Permittee shall keep records of the daily amount of each type of fuel burned in Energy System Units A and B (Source ID Nos. P001 and P002), including (a) wood, (b) plant and office waste, and (c) used oil. On days when no plant waste, office waste, or used oil is combusted, this shall be noted in the records. The Permittee shall use the daily waste fuel records to determine the monthly amounts of each type of waste burned. Using appropriate heat contents, the Permittee shall determine the percentage of waste fuel Btu input to the Energy System, on a monthly basis. At the end of each month, the Permittee shall determine the twelve-month rolling total of waste fuel oil burned. [391-3-1-.02(6)(b)1 and 391-3-1-.03(2)(c)]
- 6.2.8 The Permittee shall, from the records of wood/wood waste combusted in Energy System Units A and B (Source ID Nos. P001 and P002) each day as maintained per Condition No. 6.2.7, calculate the annual capacity factor for wood and the amount of wood/wood waste burned for each calendar quarter to verify compliance with the annual capacity factor limit. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. These records shall be maintained in a format suitable for inspection or submittal to the Division upon request for a period of five years from the date of record. [40 CFR 60.49(d)]
- 6.2.9 The Permittee shall maintain a record of all actions taken in accordance with Section 8.22 to suppress fugitive dust from roads, storage piles, or any other source of fugitive dust. Such records shall include the date and time of occurrence and a description of the actions taken. [391-3-1-.02(6)(b) 1 and 40 CFR 70.6(a)(3)(i)]

- 6.2.10. The Permittee shall comply with the applicable notification, reporting, and recordkeeping requirements of 40 CFR 63 Subpart CCCCCC, *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.* In particular: [40 CFR 63.11125]
  - a. Each owner or operator of an affected source under 40 CFR 63 Subpart CCCCCC shall keep records as specified in 6.2.10(c)(i) and (ii).

- i. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- ii. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

#### PART 7.0 OTHER SPECIFIC REQUIREMENTS

#### 7.1 Operational Flexibility

7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal Act and the changes do not exceed the emissions allowable under the Permit (whether expressed therein as a rate of emissions or in terms of total emissions). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit.:

[391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]

- a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
- b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

#### 7.2 Off-Permit Changes

7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:

[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]

- a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
- b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the Permit shield in Condition 8.16.1.
- d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act. [Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]

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#### 7.3 Alternative Requirements

Not Applicable

#### 7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

#### 7.5 Temporary Sources

[391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)]

Not applicable

#### 7.6 Short-term Activities

(see Form D5 "Short Term Activities" of the Permit application and White Paper #1)

Not Applicable.

#### 7.7 Compliance Schedule/Progress Reports

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(4)]

#### 7.8 Emissions Trading

[391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)]

Not Applicable

#### 7.9 Acid Rain Requirements

Not Applicable

#### 7.10 Prevention of Accidental Releases (Section 112(r) of the 1990 CAAA)

[391-3-1-.02(10)]

- 7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.
  - a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.
  - b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:

i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

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- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
- iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
- iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
  - i. Develop and implement a management system as provided in 40 CFR 68.15
  - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
  - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
  - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
  - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP\*eSubmit (information for establishing an account can be found at <a href="https://www.epa.gov/rmp/rmpesubmit">www.epa.gov/rmp/rmpesubmit</a>). Electronic Signature Agreements should be mailed to:

MAIL

Risk Management Program (RMP) Reporting Center P.O. Box 10162 Fairfax, VA 22038

COURIER & FEDEX

### Risk Management Program (RMP) Reporting Center CGI Federal 12601 Fair Lakes Circle Fairfax, VA 22033

Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

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#### 7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166. [Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
  - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

# 7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

Air Quality Permit and Amendment Number(s)	Dates of Original Permit or Amendment Issuance
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#### 7.13 Pollution Prevention

Not Applicable

# 7.14 Specific Conditions

Not Applicable

#### PART 8.0 GENERAL PROVISIONS

#### 8.1 Terms and References

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence. [391-3-1-.02(2)(a)2]

#### 8.2 EPA Authorities

- 8.2.1 Except as identified as "State-only enforceable" requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.

  [40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, "Inspections, Monitoring, and Entry." [40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, "Emergency Powers." [40 CFR 70.6(f)(3)(i)]

## 8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]

8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.

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[391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

## 8.4 Fee Assessment and Payment

8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."

[391-3-1-.03(9)]

## 8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit.

  [391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance. [391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation. [391-3-1-.03(10)(e)3(iii)]

#### 8.6 Transfer of Ownership or Operation

8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer.

[391-3-1-.03(4)]

## 8.7 Property Rights

8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

#### 8.8 Submissions

8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch Atlanta Tradeport, Suite 120 4244 International Parkway Atlanta, Georgia 30354-3908

8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

Air and EPCRA Enforcement Branch – U. S. EPA Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

- Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]
- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

## 8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division.

  [391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall also furnish to the Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

#### 8.10 Modifications

8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit

application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.

[391-3-1-.03(1) through (8)]

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## 8.11 Permit Revision, Revocation, Reopening and Termination

8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances:

[391-3-1-.03(10)(d)1(i)]

- a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3; [391-3-1-.03(10)(e)6(i)(I)]
- b. If any additional applicable requirements of the Acid Rain Program become applicable to the source; [391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
- c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or [391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
- d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

  [391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.

  [391-3-1-.03(10)(e)6(ii)]
- 8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency. [391-3-1-.03(10)(e)6(iii)]

8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.

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[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]

- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.

  [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

## 8.12 Severability

8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

## **8.13** Excess Emissions Due to an Emergency

- 8.13.1 An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that:

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(2) and (3)]
  - a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. The Permitted facility was at the time of the emergency being properly operated;
  - c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
  - d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission

limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement.

  [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

## **8.14 Compliance Requirements**

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
- e. Any additional requirements specified by the Division.

## 8.14.2 Inspection and Entry

a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]

i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;

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- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
- iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- b. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.

  [391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]

## 8.14.3 Schedule of Compliance

- a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
   [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
- b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

  [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
- c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

[391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]

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c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

#### 8.14.4 Excess Emissions

- a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that: [391-3-1-.02(2)(a)7(i)]
  - i. The best operational practices to minimize emissions are adhered to;
  - ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
  - iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control.

  [391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.

  [391-3-1-.02(2)(a)7(iii)]

#### 8.15 Circumvention

#### **State Only Enforceable Condition.**

8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of the pollutants in the gases discharged into the atmosphere.

[391-3-1-.03(2)(c)]

#### 8.16 Permit Shield

8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.

[391-3-1-.03(10)(d)6]

8.16.2 Any Permit condition identified as "State only enforceable" does not have a Permit shield.

## 8.17 Operational Practices

8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source.

[391-3-1-.02(2)(a)10]

## **State Only Enforceable Condition.**

8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

[391-3-1-.02(2)(a)1]

### 8.18 Visible Emissions

8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.

[391-3-1-.02(2)(b)1]

### **8.19 Fuel-burning Equipment**

8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input. [391-3-1-.02(2)(d)]

8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input.

[391-3-1-.02(2)(d)]

8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuel-burning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.

[391-3-1-.02(2)(d)]

#### 8.20 Sulfur Dioxide

8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.

[391-3-1-.02(2)(g)]

#### 8.21 Particulate Emissions

8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.

[391-3-1-.02(2)(e)]

a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

 $E = 4.1P^{0.67}$ ; for process input weight rate up to and including 30 tons per hour.  $E = 55P^{0.11} - 40$ ; for process input weight rate above 30 tons per hour.

b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

$$E = 4.1P^{0.67}$$

In the above equations, E = emission rate in pounds per hour, and P = process input weight rate in tons per hour.

#### **8.22** Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

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- b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

### **8.23** Solvent Metal Cleaning

- 8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied: [391-3-1-.02(2)(ff)1]
  - a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
  - b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
  - c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
    - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or

ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or

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- iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
- d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
- e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

#### 8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following:

  [391-3-1-.02(2)(c)1-4]
  - a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
  - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
  - a. It is a multiple chamber incinerator;
  - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
  - d. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

e.

## 8.25 Volatile Organic Liquid Handling and Storage

8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.

[391-3-1-.02(2)(vv)(1)]

## 8.26 Use of Any Credible Evidence or Information

8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[391-3-1-.02(3)(a)]

## **8.27 Internal Combustion Engines**

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:

  [40 CFR 60.4200]
  - a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
  - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
  - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
  - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
  - e. Maintain any records in accordance with Subpart IIII
  - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]

- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A "General Provisions" and 40 CFR 60 Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engine(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.

  [40 CFR 60.4230]
- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A "General Provisions" and 40 CFR 63 Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for ≤500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to:

[40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
  - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
  - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

#### **8.28** Boilers and Process Heaters

- 8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A "General Provisions" and 40 CFR 63 Subpart JJJJJJ "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."

  [40 CFR 63.11193]
- 8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A "General Provisions" and 40 CFR 63 Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."

  [40 CFR 63.7480]

### Attachments

- A. List of Standard Abbreviations and List of Permit Specific AbbreviationsB. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

## ATTACHMENT A

## **List Of Standard Abbreviations**

AIDC	A I C D 1C .
AIRS	Aerometric Information Retrieval System
APCD	Air Pollution Control Device
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BTU	British Thermal Unit
CAAA	Clean Air Act Amendments
CEMS	Continuous Emission Monitoring System
CERMS	Continuous Emission Rate Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System(s)
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf/dscm	Dry Standard Cubic Foot / Dry Standard Cubic
	Meter
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to
	Know Act
gr	Grain(s)
GPM (gpm)	Gallons per minute
H <sub>2</sub> O (H2O)	Water
HAP	Hazardous Air Pollutant
HCFC	Hydro-chloro-fluorocarbon
MACT	Maximum Achievable Control Technology
MMBtu	Million British Thermal Units
MMBtu/hr	Million British Thermal Units per hour
MVAC	Motor Vehicle Air Conditioner
MW	Megawatt
NESHAP	National Emission Standards for Hazardous Air
	Pollutants
NO <sub>x</sub> (NOx)	Nitrogen Oxides
NSPS	New Source Performance Standards
OCGA	Official Code of Georgia Annotated

PM	Particulate Matter
$PM_{10}$	Particulate Matter less than 10 micrometers in
(PM10)	diameter
PPM (ppm)	Parts per Million
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>2</sub> (SO2)	Sulfur Dioxide
USC	United States Code
VE	Visible Emissions
VOC	Volatile Organic Compound
	·
	1

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## **List of Permit Specific Abbreviations**

#### ATTACHMENT B

**NOTE:** Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

#### INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity			
Mobile Sources	Cleaning and sweeping of streets and paved surfaces	1			
Combustion Equipment	Fire fighting and similar safety equipment used to train fire fighters or other emergency personnel.				
	2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for Hospital/Medical/Infectious Waste Incinerators, that are operating as follows:				
	i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste.				
	<ul> <li>ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste by weight combined with types 0, 1, 2, and/or 3 waste.</li> <li>iii) Less than 4 million BTU/hr heat input firing type 4 waste.</li> </ul>				
	(Refer to 391-3-103(10)(g)2.(ii) for descriptions of waste types)  3. Open burning in compliance with Georgia Rule 391-3-102 (5).				
	4. Stationary engines burning:				
	i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as emergency generators shall not exceed 500 hours per year or 200 hours per year if subject to Georgia Rule 391-3-102(2)(mmm).7	2			
	ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or standby power generation, where the combined peaking and standby power generation do not exceed 200 hours per year.				
	iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of each engine does not exceed 400 horsepower and that no individual engine operates for more than 2,000 hours per year.				
	iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year.				
Trade Operations	<ol> <li>Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 pounds per year.</li> </ol>	3			
Maintenance, Cleaning, and Housekeeping	Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or collector) serving them exclusively.				
• 0	2. Portable blast-cleaning equipment.				
	3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes.				
	4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent.	1			
	5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation for maintenance or decommissioning.	1			
	6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of paint, varnish, or other foreign material, provided that such devices are equipped with afterburners.				
	7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners.				

# INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Laboratories and Testing	Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis.	1
-	2. Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility.	1
Pollution Control	1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
Industrial Operations	Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year.	
	<ul><li>2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour:</li><li>i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil-</li></ul>	
	coated parts.  ii) Porcelain enameling furnaces or porcelain enameling drying ovens.	
	iii) Kilns for firing ceramic ware.	
	<ul> <li>iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds.</li> <li>v) Bakery ovens and confection cookers.</li> </ul>	
	vi) Feed mill ovens.	
	vii) Surface coating drying ovens	
	<ul> <li>3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: <ol> <li>i) Activity is performed indoors; &amp;</li> <li>ii) No significant fugitive particulate emissions enter the environment; &amp;</li> <li>iii) No visible emissions enter the outdoor atmosphere.</li> </ol> </li> </ul>	1
	Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche).	
	5. Grain, food, or mineral extrusion processes	
	6. Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds.	
	7. Equipment for the mining and screening of uncrushed native sand and gravel.	
	8. Ozonization process or process equipment.	
	Electrostatic powder coating booths with an appropriately designed and operated particulate control system.	
	10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
	11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient temperatures.	
	12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	
i	13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year.	

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## INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored.	6
	2. All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid.	
	4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act.	
	6. Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons.	50
	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	

## INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
None	0

## **ATTACHMENT B** (continued)

### **GENERIC EMISSION GROUPS**

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

	Number	Applicable Rules		
Description of Emissions Units / Activities	of Units (if appropriate)	Opacity Rule (b)	PM from Mfg Process Rule (e)	Fugitive Dust Rule (n)
None	0	0	0	0

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

Description of Fuel Burning Equipment			
Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG.	0		
Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG.	0		
Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less.	0		

#### ATTACHMENT C

#### LIST OF REFERENCES

- 1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
- 2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
- 3. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.
- 4. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.
- 5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at www.epa.gov/ttn/chief/ap42/index.html.
- 6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at <a href="https://www.epa.gov/ttn/chief/software/tanks/index.html">www.epa.gov/ttn/chief/software/tanks/index.html</a>.
- 7. The Clean Air Act (42 U.S.C. 7401 et seq).
- 8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
- 9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).