

Part 70 Operating Permit Amendment

Permit Amendment No.: 2493-093-0022-V-03-1 **Effective Date:**

Facility Name: **Roseburg Forest Products South – Vienna Facility**

Facility Address 291 Roseburg Road
Vienna, Georgia 31092, (Dooly) County

Mailing Address: P.O. Box 187
Vienna, Georgia 31092

**Parent/Holding
Company:** Roseburg Forest Products

Facility AIRS Number: 04-13-09300022

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 an amendment to the Part 70 Operating Permit for:

To authorize construction and operation of a biofilter for reducing organic HAP emissions from the board press and to incorporate all applicable provisions of the Plywood and Composite Wood Products (PCWP) MACT into the facility's permit.

This Permit Amendment 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 Amendment and Permit No. 2493-093-0022-V-03-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2493-093-0022-V-03-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-17818 dated December 2, 2007; any other applications upon which this Permit Amendment or Permit No. 2493-093-0022-V-03-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **14** pages.

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

This permit amendment incorporates all applicable requirements of the Plywood and Composite Wood Products (PCWP) MACT into the facility's Title V Permit. As proposed by the Permittee, the permit requires the installation of a biofilter (add-on pollution control equipment) for controlling hazardous air pollutant (HAP) emissions from the board press, to comply with the PCWP MACT. This activity will not increase emissions of any pollutant from the facility. Emissions of HAPs, including formaldehyde from the board press, will be reduced by more than 90 percent. Some other VOC emissions will also be removed.

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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.

3.1.1 Amended Emission Units

| Emission Units | | Specific Limitations/Requirements | | Air Pollution Control Devices | |
|----------------|-------------------------------------|--|---|-------------------------------|-------------|
| ID No. | Description | Applicable Requirements/Standards | Corresponding Permit Conditions | ID No. | Description |
| 450 | Press | GA Rule 391-3-1-.02(2)(c) GA Rule 391-3-1-.02(2)(b) 40 CFR 63 Subpart A 40 CFR 63 Subpart DDDD | 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.5, 3.4.2, 3.4.3, 4.2.2, 4.2.3, 4.2.5 through 4.2.7, 5.2.7 through 5.2.9, 5.2.11 through 5.2.13, 6.1.2, 6.1.7, 6.2.3, 6.2.4, 6.2.6 through 6.2.10 | 450B | Biofilter |
| 600 | Wood Waste Boiler No. 1 | GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(g) | 3.4.1, 3.4.2, 3.4.4, 4.2.1, 5.2.1, 6.1.7 | BC1 | Multiclone |
| 700 | Natural Gas Boiler No. 2 | GA Rule 391-3-1-.02(2)(d) GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(g) | 3.4.1, 3.4.2, 3.4.4, 6.2.1, 6.2.2 | None | None |
| 350 | Core Dryer / Burner | 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g) | 3.3.1, 3.3.2, 3.3.6, 3.3.7, 3.4.2, 3.4.3, 3.4.4, 4.2.4, 5.2.4, 5.2.7 through 5.2.13, 6.1.7, 6.2.3, 6.2.4, 6.2.5, 6.2.7 through 6.2.10 | 221 | Cyclone |
| 360 | Face Dryer / Burner | 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) GA Rule 391-3-1-.02(2)(g) | 3.3.1, 3.3.2, 3.3.6, 3.3.7, 3.4.2, 3.4.3, 3.4.4, 4.2.4, 5.2.4, 5.2.7 through 5.2.13, 6.1.7, 6.2.3, 6.2.4, 6.2.5, 6.2.7 through 6.2.10 | 222 | Cyclone |
| 460 | Board Cooler | GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) | 3.4.2, 3.4.3 | None | None |
| 580 | Group 1 Miscellaneous Coating | 40 CFR 63, Subpart A 40 CFR 63, Subpart DDDD GA Rule 391-3-1-.02(2)(b) GA Rule 391-3-1-.02(2)(e) | 3.3.1, 3.3.2, 3.3.7, 4.2.4, 6.1.7, 6.2.4, 6.2.5, 6.2.7, 6.2.9 through 6.2.11 | None | None |

* Generally applicable requirements contained in this permit may also apply to emission units listed above.

3.3 Equipment Federal Rule Standards

- 3.3.1 The Permittee shall comply with all applicable provisions of the National Emission Standard for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63, in Subpart A – “General Provisions” as specified in Table 10 of 40 CFR 63 Subpart DDDD. [40 CFR 63, Subpart A and 40 CFR 63.2290]
- 3.3.2 The Permittee shall comply with all applicable provisions of 40 CFR 63, Subpart DDDD – “*Plywood and Composite Wood Products (PCWP)*” aka the “*Plywood MACT*”, on or before October 1, 2008, with the exception of the progress reports, which are due within 15 days of January 1, 2008, April 1, 2008, July 1, 2008 and October 1, 2008. The progress report shall address the startup of the biofilter. [40 CFR 63, Subparts A and DDDD and the 1 year extension granted by EPD; 40 CFR 63.10(d)(4); and 40 CFR 63.6(i)]
- 3.3.3 The Permittee shall reduce formaldehyde emissions from the Press (Source ID 450) by 90 percent. [Table 1B of 40 CFR 63 Subpart DDDD]
- 3.3.4 The Permittee shall maintain the 24-hour block biofilter bed temperature within the range established according to Condition 4.2.3. [No. 2 of Table 7 and Table 2 of PCWP MACT and 40 CFR 63.2262]
- 3.3.5 The Permittee shall be in compliance with Conditions 3.3.3 and 3.3.4 at all times, except during periods of the Press (450) or Biofilter (450B) startup, shutdown, and malfunction and during routine control device maintenance exempt periods approved per 40 CFR 63.2251. To the extent practical, startup, shutdown and maintenance of the biofilter must be scheduled during times when the Press is also shut down. [40 CFR 63.2250(a) and 40 CFR 63.2251(e)]
- 3.3.6 For Dryers 350 and 360, the Permittee shall process furnish with an inlet moisture content of less than or equal to 30 percent (by weight, dry basis) AND operate with an inlet dryer temperature of less than or equal to 600 °F. [No. 1 in Table 3 of 40 CFR 63 Subpart DDDD]
- 3.3.7 For all Group 1 miscellaneous coating operations at the facility, the Permittee shall use non-HAP coatings as defined in 40 CFR 63.2292. HAP content in such coatings shall be less than 0.1 percent by mass for OSHA carcinogens as specified in 29 CFR 1910.1200(d)(4), and less than 1.0 percent by mass for other HAP compounds. [No. 5 in Table 6 of 40 CFR 63 Subpart DDDD]
- 3.3.8 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain all affected sources, air pollution control equipment, and the monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the Permittee reduce emissions from the affected sources to the greatest extent, which is consistent with safety and good air pollution control practices.

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The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the Permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. 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, including the startup, shutdown, and malfunction plan required by Condition 5.2.11, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.2250(b) and 40 CFR 63.6(e)(1)(i)]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

Amended Conditions

- 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)]

- 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 which pertain to the emission units listed in Section 3.1 are as follows:
 - a. Method 1 shall be used for selection of sampling site and number of traverse points.
 - b. Method 2 shall be used to determine the stack gas flow rate.
 - c. Method 3 or 3A shall be used to determine the gas molecular weight.
 - d. Method 3B shall be used to determine the emissions rate correction factor or excess air. Method 3A may be used as an alternative to Method 3B.
 - e. Method 4 shall be used to determine the moisture concentration.
 - f. Method 5 shall be used to determine the Particulate Matter concentration for sources other than the core and surface dryers and the board press.
 - g. Method 5T shall be used to determine the Particulate Matter concentration for the core and surface dryers and the board press. Method 5 with Method 202 may be used as an alternate method.
 - h. Method 7 or 7E shall be used to determine the Nitrogen Oxides concentration.
 - i. Method 9 and the procedures of Section 1.3 of the above referenced document shall be used to determine opacity.

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- j. Method 10 shall be used to determine the Carbon Monoxide concentration.
- k. Method 19 shall be used to determine the Particulate Matter emission rates.
- l. Method 25 shall be used to determine the concentration of Volatile Organic Compounds, as carbon. For Method 25 measurements, a factor of 1.2 shall be used to convert the VOC (as carbon) to actual VOC. Method 25A may be used as an alternate method. When determining the emission rate from the board press, the emission rate of formaldehyde shall be added to the emission rate as determined using Method 25A. Appropriate conversion factors must be used to convert the VOC (as carbon) to actual VOC. A conversion factor of 1.2 may be used if industry specific data is not available.
- m. Method 0011 from “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA publication SW-846 shall be used to determine the formaldehyde concentration. The sampling time for each run shall be one hour. [EPA Method 0011 (sampling) and EPA Method 0011A (analysis) may be used for the determination of formaldehyde concentration [40 CFR 266, Appendix IX]. Alternatively, Method 316 or 320 in Appendix A to 40 CFR Part 63; OR NCASI Method CI/WP-98.01 OR NCASI Method IM/CAN/WP-99.02 OR NCASI Method ISS/FP-A105.01 may be used.
- n. ASTM Test Method D129, D1552, D2622 or D4294 shall be used to determine the fuel sulfur content.
- o. Method CTM 30 shall be used to determine the nitrogen oxides and carbon monoxide concentrations from Boiler B001, Dryers D006-D009, and the Coen burner when determining compliance with the limits in Condition 3.2.3.
- p. Test Method 10.1 shall be used to determine the free formaldehyde concentration in urea-formaldehyde resins (Ice-Sulfite Method). [NCASI Technical Bulletin No. 664 May 1994]
- q. Method 204A through 204F of 40 CFR 51 Appendix M shall be used to establish criteria for and verification of a permanent or temporary total enclosure. Testing of an enclosure may also be conducted using the alternative tracer gas method in PCWP MACT Appendix A.
- s. Method 320 in Appendix A to 40 CFR Part 63; OR the NCASI Method IM/CAN/WP-99.01 (incorporated by reference, see § 63.14(f)) shall be used for determination of total Hazardous Air Pollutants (HAP).
- t. Method 308 in Appendix A to 40 CFR Part 63; OR Method 320 in Appendix A to 40 CFR Part 63; OR the NCASI Method CI/WP-98.01 (incorporated by reference; see § 63.14(f)); OR the NCASI Method IM/CAN/WP-99.01 (incorporated by reference; see § 63.14(f)) shall be used for determination of methanol.

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)]

4.2 Specific Testing Requirements

4.2.2 Within 180 days following the startup of the Biofilter (450B), but no later than March 29, 2009 the Permittee shall conduct performance tests on the Press (450) for formaldehyde emissions destruction efficiency. The formaldehyde concentration shall be measured at the biofilter inlet and outlet.

[40 CFR 63.2260(a) and 40 CFR 63.2261(a)]

4.2.3 During performance tests required by Conditions 4.2.2 and 4.2.5, the Permittee shall establish a range for the 24-hour block biofilter bed temperature as described below:

[40 CFR 63.2262(m)(1) through (m)(3); and Table 4 of the 40 CFR 63 Subpart DDDD]

a. The Permittee shall continuously monitor the biofilter bed temperature during each of the required 1-hour test runs. For monitoring the biofilter bed temperature the Permittee may use multiple thermocouples in representative locations throughout the biofilter bed and calculate the average biofilter bed temperature across these thermocouples prior to reducing the temperature data to 15-minute averages for the purposes of establishing biofilter bed temperature limits. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs. The biofilter bed temperature range may be based on values recorded during previous performance tests provided the data used to establish the temperature ranges were obtained using test methods required by the PCWP MACT. In such a case, the Permittee must certify that the biofilter and the press have not been modified subsequent to the performance test date. Replacement of the biofilter media with the same type of material is not considered a modification of the biofilter for the purpose of this section.

b. The requirements in paragraph a. of this condition shall be completed by the dates specified in Conditions 4.2.2 and 4.2.5.

c. The Permittee may expand the biofilter bed temperature operating range by submitting a notification to EPD within 30 days prior to the expansion and shall conduct a repeat performance test, as specified in paragraph a. of this condition, that demonstrates compliance with the applicable compliance options of this MACT.

4.2.4 Initial compliance demonstrations not requiring performance tests shall be performed no later than November 1, 2007.

[40 CFR 63.2261(b)]

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- 4.2.5 The Permittee shall conduct repeat formaldehyde destruction efficiency performance tests using the applicable methods specified in Table 4 of the PCWP MACT and in Condition 4.1.3 within 2 years following the previous test and repeat testing within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media.
[No. 3 of Table 7 of 40 CFR 63 Subpart DDDD]
- 4.2.6 The Permittee shall measure the capture efficiency of the enclosure for the press using Methods 204 and 204A through 204F of 40 CFR 51 Appendix M or using the alternative tracer gas method contained in Appendix A of PCWP MACT.
[40 CFR 63.2267 and No. 9 of Table 4 of 40 CFR 63 Subpart DDDD]
- 4.2.7 Performance tests required by the PCWP MACT shall be conducted according to the requirements in 40 CFR 63.7(e)(1) and the applicable requirements in 40 CFR 63.2262(b) through (m), using methods specified in Table 4 of 40 CFR 63 Subpart DDDD as follows:
[40 CFR 63.2262(a),(b)(1),(b)(2),(c),(d),(e),(g)(1),(h) and 40 CFR 63.7(e)(1)]
- a. The performance tests shall not be conducted during periods of startup, shutdown, malfunction, and approved routine control device maintenance exempt periods.
 - b. Performance tests shall be conducted under representative operating conditions, per 40 CFR 63.2292. The performance test reports shall describe representative operating conditions and include explanation of why the tests are representative.
 - c. The Permittee shall conduct three separate test runs with each test run being at least 1 hour in duration except for testing a total enclosure conducted using the alternative tracer gas method of Appendix A of the PCWP MACT, for which the three separate runs must be at least 20 minutes in duration.
 - d. The sampling sites for the formaldehyde destruction efficiency performance tests shall be located at the inlet and outlet of the biofilter, prior to any releases to the atmosphere.
 - e. For the PCWP MACT performance tests, the Permittee shall collect operating parameter monitoring system or CEMS data at least every 15 minutes during the entire performance test and determine the parameter or concentration value for the operating requirement during the performance test according to Condition 4.2.3.
 - f. All nondetect data except that specified in 40 CFR 63.2262(g)(2) must be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol or total hydrocarbon (THC) emission rates.
 - g. The percent reduction of formaldehyde emissions from the press shall be calculated using Equation 1 of 40 CFR 63.2262(h).

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

- 5.2.7 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 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 at representative locations in the biofilter.
 - b. Temperature at the inlet of Dryers 350 and 360.
 - c. Furnish moisture at the inlet of Dryers 350 and 360.
- 5.2.8 The Permittee shall install, operate and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (a)(3) of 40 CFR 63.2269.
[40 CFR 63.2269(a)]
- 5.2.9 Each temperature monitoring device shall meet the requirements in paragraphs (a) and (b)(1) through (b)(6) of 40 CFR 63.2269 as follows:
[40 CFR 63.2269(a),(b)]
- a. The temperature sensor must be located at a position that provides representative temperature.
 - b. The temperature sensor must have minimum accuracy of 4°F or 0.75 percent of the temperature value.
 - c. A chart recorder, if used, must have a sensitivity with minor divisions of not more than 20 °F.
 - d. The Permittee shall perform an electronic calibration at least semi-annually, according to the procedures in the owners manual, and conduct a temperature sensor validation check following the calibration in which a second redundant temperature sensor, placed near the process temperature sensor, yields a reading within 30 °F of the process temperature sensor reading.
 - e. The calibration and validation checks shall be conducted any time the sensor exceeds the manufacturer’s specified maximum operating temperature range or the Permittee shall install a new temperature sensor.
 - f. Inspect all components for integrity and all electrical connections for continuity, oxidation and galvanic erosion at least quarterly.

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- 5.2.10 Each furnish moisture monitoring device shall meet the requirements in paragraphs (a) and (c)(1) through (c)(5) of 40 CFR 63.2269 as follows:
[40 CFR 63.2269(a),(c)]
- a. For Dryers 350 and 360, the Permittee shall use a continuous moisture monitor with a minimum accuracy of 1 percent (dry basis) moisture or better in the 25 to 30 percent (dry basis) moisture content range.
 - b. The moisture monitor shall be located at a position that provides a representative measure of furnish moisture.
 - c. The moisture monitor shall be calibrated based on the procedures in the owners manual at least once per semi-annual compliance period (or more frequently if recommended by the moisture monitor manufacturer).
 - d. All components of the moisture monitor shall be inspected for integrity and all electrical connections shall be tested for continuity, at least quarterly.
 - e. The Permittee shall use Equation 1 of 40 CFR 63.2269(c)(5) to convert percent moisture measurements from wet basis to dry basis.
- 5.2.11 The Permittee shall conduct all monitoring in continuous operation at all times that the press is operating except, as appropriate, for monitor malfunctions, associated repairs, routine control device maintenance exempt periods and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). For purposes of calculating data averages, data recorded during monitor malfunctions, associated repairs, out-of-control periods, routine control device maintenance exempt periods or required quality assurance or control activities shall not be used in data averages and calculations used to report emission or operating levels nor may such data be used in fulfilling a minimum data availability requirement. Data collected during all other periods shall be used in assessing compliance. Monitoring failures caused in part by poor maintenance or careless operations are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calibrations, constitutes a deviation from the monitoring requirements.
[40 CFR 63.2270(b),(c)]
- 5.2.12 The Permittee shall determine the 24-hour block average of all recorded temperature readings, and furnish moisture calculated after every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours excluding periods described in Condition 5.2.11.
[40 CFR 63.2270(e)]
- 5.2.13 The Permittee must have at least 75 percent of the required recorded temperature readings for that period, using only recorded readings that are based on valid data, to calculate data averages for each 24-hour averaging period.
[40 CFR 63.2270(f)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Amended Conditions

- 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), 40 CFR 70.6(a)(3)(iii)(B) and 40 CFR 63.2281(d)]

- 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)(i)]

- 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 fuel oil burned in Boiler No. 2 (ID No. 700) with more than 2.5% sulfur.
- ii. Any time a HAP coating as defined in 40 CFR 63.2292 is used in any Group 1 miscellaneous coating operation at the facility.
- iii. Any time it is determined that the formaldehyde emission reduction from the Press (Source ID P004) is less than 90 percent.

- 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 time the pressure drop reading of Multiclone BC1, made in accordance with Condition 5.2.1, is less than the value indicated below:
 - A. For steam loads greater than or equal to 19,000 lbs/hr, any pressure drop reading that is less than 2.3 inches of water.
 - B. For steam loads greater than 16,000 lbs/hr but less than 19,000 lbs/hr, any pressure drop reading that is less than 2.0 inches of water.
 - C. For steam loads less than or equal to 16,000 lbs/hr, any pressure drop reading that is less than 1.7 inches of water.
- ii. For the sources specified in Condition 5.2.2, any two consecutive required daily determinations of visible emissions, from the same source, for which visible emissions requiring action are present.
- iii. Any instance an operational or maintenance check required by Condition 5.2.3 reveals that a maintenance action level was triggered and the maintenance was not performed according to the Preventative Maintenance Program.
- iv. Any adverse condition revealed by the inspection required by Condition 5.2.4.
- v. Any 24-hour block average dryer inlet temperature greater than 600 °F.
- vi. Any 24-hour block average dryer inlet furnish moisture greater than 30 percent (by weight, dry basis).
- vii. Any 24-hour block biofilter bed temperature that is outside the range established per Condition 4.2.3.

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.3 The Permittee shall develop a written a startup, shutdown and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3).
[40 CFR 63.2250(c)]
- 6.2.4 The Permittee shall submit Notification of Compliance Status (NOCS) containing the results of initial compliance demonstration before the close of business on the 60th day following the completion of the required performance tests.
[40 CFR 63.2260(c), 40 CFR 63.2280(d) and 40 CFR 63.9(h)(2)(ii)]
- 6.2.5 For each compliance demonstration required in Table 5 or 6 of the PCWP MACT that does not include a performance test, the Permittee shall submit a NOCS before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.
[40 CFR 63.2280(d)(1)]

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- 6.2.6 The Permittee shall submit documentation that the wood product enclosure meets the press enclosure design criteria in 40 CFR 63.2292 by March 29, 2009 or submit the results of the capture efficiency verification with the Notification of Compliance Status (NOCS) required in Condition 6.2.4.
[40 CFR 63.2267]
- 6.2.7 The Permittee shall submit a compliance report semiannually as specified in Condition 6.1.4. The compliance report shall contain information specified in 40 CFR 63.2281(c) through (e) and (g). This report shall also list all deviations which occurred as defined in the PCWP MACT.
[40 CFR 63.2281 and Table 9 of 40 CFR 63 Subpart DDDD]
- 6.2.8 The Permittee shall submit an immediate startup, shutdown, and malfunction (SSM) report if an SSM occurred that is not consistent with the SSMP specified in Condition 6.2.3. This report must contain actions taken by the Permittee for the event and must be submitted by fax, e-mail or telephone within 2 working days after starting actions inconsistent with the plan, followed by a letter submitted in writing within 7 working days after the end of the event, unless alternative arrangements have been made in advance in accordance with 40 CFR 63.9(i), with the Division. The written report shall contain the name, title, and the signature of the owner or the operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP and describing all excess emissions and or parameter monitoring exceedances which are believed to have occurred.
[40 CFR 63.2281(a), 40 CFR 63.10(d)(5)(ii) and Table 9 of 40 CFR 63 Subpart DDDD]
- 6.2.9 The Permittee shall keep the following records, in accordance with Condition 6.1.1:
[40 CFR 63.2282(a)(1) through (a)(4),(b) and Table 7 of PCWP MACT]
- a. A copy of each notification and report submitted for demonstrating compliance with the PCWP MACT, including all documentation supporting any initial notification or Notification of compliance status submitted according to the requirements of 40 CFR 63.10(b)(2)(viii).
 - b. Startup, shutdown and malfunction records as per 40 CFR 63.6(e)(3)(iii) through (v).
 - c. Documentation of any approved routine control device maintenance exemption (RCDME) requested under 40 CFR 63.2251 and
 - d. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).
 - e. Records of repeat performance tests conducted as per Condition 4.2.5 for demonstrating continuous compliance with the PCWP MACT.
- 6.2.10 Records required by Condition 6.2.9 shall be kept on site for at least 2 years after the date of occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). For the remaining 3 years these records can be maintained offsite.
[40 CFR 63.2283]

Title V Permit Amendment

- 6.2.11 The Permittee shall keep records of the HAPs content of each coating used in all Group 1 miscellaneous coating operations at the facility as per Condition 6.2.10, to demonstrate continuous compliance with Condition 3.3.7.
[No. 5 of Table 8 of PCWP MACT]

Title V Permit Amendment

Roseburg Forest Products South – Vienna Facility

Permit Amendment No.: 2493-093-0022-V-03-1
