

**NORTH COAST UNIFIED
AIR QUALITY MANAGEMENT DISTRICT
2300 Myrtle Avenue, Eureka, CA 95501
Phone: (707)443-3093 - Fax: (707) 443-3099**



**SIGNIFICANT MODIFICATION TO
TITLE V PERMIT NO: NCU 047-12**

ISSUED TO:

Humboldt Flakeboard Panels, Inc
4700 West End Road
Arcata, CA 95521

PLANT SITE LOCATION:

Humboldt Flakeboard Panels, Inc
4700 West End Road
Arcata, CA 95521

Title V PERMIT NCU 047-12 EXPIRES:

March 16, 2013

PERMIT REVISION HISTORY:

Initial Permit	July 18, 1997
Series of Modifications	1998 through 2001
First Renewal	May 27, 2003
Significant Modification	TBD

RESPONSIBLE OFFICIAL:

Mr. Randy Scott
General Manager & Vice President
(707) 825-1800

CONTACT PERSON:

Joel Wallen
Environmental Manager
(707) 825-1800

NATURE OF BUSINESS:

Commercial Particle Board Production

**STANDARD INDUSTRIAL
CLASSIFICATION (SIC):**

2493

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PERMIT SUMMARY

This permit is a Significant Modification to a Title V Permit to Operate issued pursuant to North Coast Unified Air Quality Management District (District) Rules and Regulations and the U.S. EPA's 40 CFR Part 70 (State Operating Permit Programs) Regulations. This Permit supersedes Authority To Construct Permits 607-1 and 608-1 (ATC Permits) issued for the construction and temporary operation of equipment related to a hazardous air pollutant emission reduction project. The ATC Permits shall remain valid until rescinded by the District Air Pollution Control Officer. The Permit contains provisions establishing a compliance schedule required pursuant to a stipulated order of abatement issued by the District Hearing Board.

The application for this air quality Permit to Operate has been evaluated for compliance with District, State, and Federal air quality rules and regulations. The following listed rules are the major rules that were found to be applicable at the time of this permit review, and based on the information submitted with the Title V permit application.

Federally Enforceable Rules & Regulations

Citation	Description	Adoption Date
Regulation I, Rule 102	Permit Requirements	5-19-05
Regulation I, Rule 110	New Source Review Standards	5-19-05
Regulation I, Rule 103	Action on Applications	5-19-05
Regulation I, Rule 104.2	Visible Emissions	5-19-05
Regulation I, Rule 104.3	Particulate Matter	5-19-05
Regulation I, Rule 104.4	Fugitive Dust	5-19-05
Regulation I, Rule 104.5	Sulfur Oxide Emissions	5-19-05
Regulation V	Procedures for Issuing Permits to Operate for Sources Subject to Title V	5-19-05
NESHAP	40 CFR 63 Subpart DDDD – Plywood & Composite Wood Products	Amended 1-18-2008

Non-Federally Enforceable Rules & Regulations

Citation	Description	Adoption Date
Regulation IV, Rule 400	Stationary Source Permit Fees	5-19-05
Regulation IV, Rule 406	Title V Fees	5-19-05
Regulation IV, Rule 407	Air Toxic “Hot Spots” (AB2588) Fees	5-19-05
Regulation IV, Rule 412	Major Source Assessment	5-19-05

FACILITY DESCRIPTION

PERMIT HISTORY

Initial Permit	July 18, 1997
Revision	August 10, 1999
Revision	June 12, 2000
Revision	July 7, 2000
Revision	March 8, 2001
Revision	December 10, 2001
Revision	July 1, 2002
First Renewal	May 17, 2003
Significant Modification	TBD

EQUIPMENT DESCRIPTION

This facility is a particleboard manufacturing plant located in the northern part of Arcata, California. The particleboard plant has five separate processes: Combustion, Material Preparation, Wood Flake Drying, Forming, and Finishing. The plant receives raw material wood wastes, consisting mostly of sawdust and shavings from sawmills, which are processed (refined) into fine wood particles. These wood particles (furnish) are dried to remove moisture in one of three dryers prior to mixing with wax, scavenger chemicals, resin, catalyst and other materials. The coated wood particles are then formed into mats for pressing under high temperature and pressure into particleboard of various thicknesses. The boards are transferred to the finishing area of the plant for surface preparation and board sizing prior to packaging and shipping.

The dryers are directly heated by the combustion of sander dust, with a natural gas supplement for pilot firing purposes. Exhaust gasses from the dryers are currently routed through a multiclone, through a wet electrostatic precipitator, and then through the Bio-filtration Unit (BFU) where they are discharged at 80 feet above ground level. The particleboard press is heated by steam from a boiler fueled by natural gas and sander dust wood waste. The boiler emissions are ducted through a stack located on the west side of the main building.

This facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products (PCWP) 40 CFR Part 63 Subpart DDDD which became effective in October of 2007. The applicant was unable to comply with the regulation before the effective date and so formally requested a compliance extension. Under authority of 40 CFR §63.6, the APCO granted the compliance extension until October 1st 2008. The compliance request was conditioned upon the satisfaction of a series of milestones ultimately culminating with the installation of the BFU downstream of the wet electrostatic precipitators (WESPs). The Permittee was unable to demonstrate compliance with the PWCP MACT prior to the extension deadline, and consequently a series of Notices of Violation were issued by the District. The enforcement action culminated in the issuance of a stipulated order of abatement by the District Hearing Board. As partial payment of penalties, the Permittee agreed to a

list of supplemental environmental projects, including the installation of equipment. In November of 2008, construction of the HAP reduction project was completed. Source testing was later performed that confirmed that the required percentage emission reduction of HAPs was achieved thereby satisfying the requirements of 40 CFR §63.2240(b).

EQUIPMENT OPERATING SCENARIOS

As a particle board production facility, market circumstances and demand will dictate the exact operation of permitted equipment. However, the following general operating modes are projected to occur.

Continuous Production – The facility may be operated twenty four (24) hours per day, seven (7) days per week, and three hundred and sixty five (365) days per year with minimal down periods for maintenance and repairs.

Intermittent Production – The facility may be operated intermittently, and is designed to withstand a series of startups and shutdowns. However, the environmental conditions within the Bio-Filtration Unit (BFU) must be maintained within set parameters at all times in order to sustain the microbial population responsible for Hazardous Air Pollutant destruction. Excursions outside the environmental parameters may result in significant microbial death and thereby diminish the operating efficiency of the BFU for extended periods of time. Operating practices, monitoring, and recordkeeping requirements have been incorporated as permit conditions in order to ensure both short term and long term consistent compliance with emission limits.

DEFINITIONS

As used in this Permit, the terms shall have the meaning set out herein.

- a. **Acfm**: actual cubic feet per minute
- b. **Alternative Liquid Fuel**: An alternative diesel fuel or CARB Diesel Fuel with fuel additives that meets the requirements of the California Air Resources Board Verification Procedure, as codified in Title 13, CCR, sections 2700-2710
- c. **APCO**: the District Air Pollution Control Officer
- d. **Calendar Day**: Any continuous 24-hour period beginning at 12:00 AM or 0000 hours
- e. **California Air Resources Board (CARB) Diesel Fuel**: Any diesel fuel that is commonly or commercially known, sold, or represented by the supplier as diesel fuel No. 1-D or No. 2-D, pursuant to the specifications in ASTM D975-81, "Standard Specification for Diesel Fuel Oils," as modified in May 1982, which is incorporated herein by reference, and that meets the specifications defined in Title 13 CCR, sections 2281, 2282 and 2284
- f. **CAM Plan**: Compliance Assurance Monitoring Plan, as defined in 40 CFR 64
- g. **CARB**: the California Air Resources Board
- h. **CEMS**: Continuous Emissions Monitoring System

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- i. **CFR:** the Code of Federal Regulations
 - j. **Commencement of Onsite Construction:** the commencement of a program of significant and continuous construction at the Facility or modification of the emissions unit(s) subject to this Permit
 - k. **COMS:** Continuous Opacity Monitor
 - l. **District:** North Coast Unified Air Quality Management District
 - m. **Dscfm:** dry standard cubic feet per minute
 - n. **Emergency:** operation arising from a sudden and reasonably unforeseeable event beyond the control of the Permittee (e.g., an act of God) which causes the excess of a limitation under this permit and requires immediate and corrective action. An “emergency” does not include noncompliance as a result of improperly designed or installed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - o. **EPA:** the United States Environmental Protection Agency
 - p. **Facility:** the site of the Humboldt Flakeboard Panel facility
 - q. **Firing Hours:** Period of time during which fuel is flowing to a unit, measured in minutes divided by 60
 - r. **Heat Input:** the energy (heat) input of the fuel combusted at the higher heating value (HHV) of the fuel
 - s. **HFP:** Humboldt Flakeboard Panel
 - t. **HHV:** Higher Heating Value
 - u. **Hr:** one hour – a standard measurement of time
 - v. **H₂S:** Hydrogen Sulfide
 - w. **Lb:** pound – an English unit of measurement of weight and mass being equivalent to 7000 grains, 16 ounces, and 0.453 kilograms
 - x. **MMBtu:** million British thermal units
 - y. **MSF:** means thousand square feet (92.9 square meters). Square footage of panels is usually measured on thickness basis, such as 3/8 inch, to define total volume of panels. Equation 6 of §63.2262(j) shows how to convert from one thickness basis to another [*§40 CFR63.2292*]
 - z. **Natural Gas:** any mixture of gaseous hydrocarbons containing at least 80 percent methane by volume as determined by Standard Method ASTM D1945-64
 - aa. **NFPA:** National Fire Protection Association
 - bb. **Notice:** unless otherwise stated, shall be in writing, sent postage prepaid, to the APCO and include all information required. Notice shall be sent to the APCO at the following address: 2300 Myrtle Ave., Eureka, CA 95501
 - cc. **O₂:** Oxygen
 - dd. **Permittee:** the owner or operator identified on the Permit title page
 - ee. **PM:** Particulate Matter
 - ff. **Ppmvd:** parts per million, volumetric dry
 - gg. **Production Week:** the 168 hour period beginning on a given Sunday at 0000 hrs through the following Saturday at 2359 hrs.
 - hh. **Responsible Official:** person(s) who have direct supervisory authority or control to affect operations of the equipment authorized pursuant to this Permit, and who have the ability to certify that a source complies

- with all applicable federal requirements and federally enforceable permit conditions as generally defined in District Rule 101 §1.245
- ii. **Rolling 3-hour Period:** Any consecutive three-hour period, not including start-up or shut-down periods
 - jj. **ROC:** reactive organic compound consistent with District Rule 101 §1.293
 - kk. **Quarter:** calendar quarter, consisting of the following Q1 - January through March; Q2 - April through June; Q3 - July through September; Q4 - October through December
 - ll. **Shutdown Period:** The 30 minute period immediately prior to the termination of fuel flow or material to a device.
 - mm. **SO₂:** Sulfur Dioxide
 - nn. **Startup Period:** The lesser of the first 60 minutes of continuous fuel or material flow to a device after fuel or material flow is initiated.
 - oo. **VEE:** Visible Emissions Evaluation
 - pp. **Year:** Any consecutive twelve-month period of time

FEDERALLY ENFORCEABLE GENERAL REQUIREMENTS

TITLE V PERMIT MODIFICATIONS AND RENEWAL

1. The Permittee shall submit to the Air Pollution Control Officer a completed Title V permit application for renewal no earlier than January 18, 2011 (18 months prior to the expiration date of the Title V permit) and no later than January 18, 2012 (6 months prior to the expiration date of the Title V permit). *[District Rule 502 §2.2; 40 CFR 70.5(a)(1)(iii)]*
2. If modifications to the permit are necessary, the Permittee shall submit to the Air Pollution Control Officer a complete Title V permit application for either an Administrative, Minor, or Significant Title V permit modification. The application shall not be submitted prior to receiving any required preconstruction permit from the District. *[District Rule 502 §2.3; 40 CFR 70.5(a)(1)(ii)]*
3. The Permittee shall submit to the Air Pollution Control Officer timely updates to the Title V application as new requirements become applicable to the source, and in no event less than quarterly (i.e., every three months). *[40 CFR 70.5(b)]*
4. The Permittee shall promptly provide additional information in writing to the Air Pollution Control Officer upon discovery of submittal of any inaccurate information as part of the application or as a supplement thereto; or of any additional relevant facts previously omitted which are needed for accurate analysis of the application and including inaccurate information known, or which should have been known or should be known, by the Permittee(s). *[District Rule 502 §5.1, 5.3, 5.4; 40 CFR 70.5(a)(2) and (b)]*
5. Upon written request of the Air Pollution Control Officer, the Permittee shall supplement any complete application with additional information within the time frame specified by the Air Pollution Control Officer. *[District Rule 502 §5.2; 40 CFR 70.5(a)(2) and (b)]*
6. When submitting an application for a permit pursuant to Regulation V, the Permittee shall include the following information: A certification by a responsible official of all reports and other documents submitted for permit application; compliance progress reports at least every 6 months for, and submitted no later than 30 days after, the periods January 1st through June 30th and July 1st through December 31st of each year; statements on compliance status with any applicable enhanced monitoring; and annual compliance plans, no later than January 30th of each year, which shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. *[40 CFR 70.5(c)(9) and (d)]*
7. With the exception of acid rain units subject to Title IV of the Clean Air Act and solid waste incinerators subject to section 129(e) of the Clean Air Act, each permit issued pursuant to District Regulation 5 for any source shall include a condition for a fixed term not to exceed five years from the time of issuance. A permit to operate for an

acid rain unit shall have a fixed permit term of five years. A permit to operate for a solid waste incinerator shall have a permit term of 12 years. However, the permit shall be reviewed at least every five years. *[District Rule 504 §11.0; 40 CFR 70.6(a)(2)]*

COMPLIANCE

8. The Permittee shall comply with all conditions of this Significant Modification Permit and of the Title V Permit. *[District Rule 504 §2.7]*
9. The Permittee may not assert or use as a defense, expressly, impliedly, or by operation of law or past practice, in any enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Title V permit. *[District Rule 504 §2.7.4]*
10. The Title V permit may be modified, revoked, reopened and reissued or terminated for cause. *[District Rule 503 §9.0]*
11. The Permittee shall furnish to the Air Pollution Control Officer, within 10 (ten) days of the request, any information that the Air Pollution Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, terminating this permit, or to determine compliance with this Significant Modification Permit. Upon request, the Permittee shall also furnish to the Air Pollution Control Officer copies of records required to be kept by conditions of this permit. For information claimed to be confidential, the Permittee may furnish such records along with a claim of confidentiality. *[40 CFR 70.6(a)(6)(v)]*
12. Noncompliance with any federally enforceable requirement in the Significant Modification Permit is grounds for Title V permit termination, revocation and reissuance, modification, enforcement action, or denial of the Title V permit renewal application. *[District Rule 504(2.7.3)]*
13. A pending Title V permit action (e.g. a proposed permit revision) or notification of anticipated noncompliance does not stay any permit condition. *[District Rule 504 §2.7.5]*
14. This Significant Modification of the Title V permit does not convey any property rights of any sort or any exclusive privilege. *[District Rule 504 §2.7.2]*
15. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the Air Pollution Control Officer or an authorized representative to perform all of the following:
 - A. Enter the stationary source's premises where this source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Title V permit;
 - C. Inspect at reasonable times, the stationary source, equipment (including

monitoring and air pollution control equipment), practices and operations regulated or required under this Title V permit; and

- D. As authorized by District rules or by the Federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of ensuring compliance with the Title V permit conditions or applicable federal requirements. *[District Rule 504 §2.5]*

REPORTS AND RECORDKEEPING

16. Monitoring Reports

- A. The Permittee shall submit to the Air Pollution Control Officer at least once every six months, unless required more frequently by an applicable requirement, reports of all required monitoring set out in this Significant Modification Permit.
- B. The reporting periods for this permit shall be for the six month periods January 1st through June 30th and July 1st through December 31st. The reports shall be submitted by July 30th and January 30th of each year respectively.
- C. Any and all instances of deviations from Significant Modification Permit conditions must be clearly identified in such reports. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. *[District Rule 502 §11.0 and Rule 504 §5.0; 40 CFR 70.6(a)(3)(ii) and (iii)]*

17. Compliance Reports

- A. The Permittee shall submit to the Air Pollution Control Officer and to U.S. EPA (Air-3, U.S. EPA, Region IX) on an annual basis, unless required more frequently by additional applicable federal requirements, a certification of compliance by the Permittee with all terms and conditions contained in the Title V permit, including emission limitations, standards and work practices.
- B. The reporting period for this permit shall be January 1st through December 31st. The report shall be submitted by January 31st of each year. The initial report shall be for the period January 1st 2009 through December 31st 2009.
- C. All required reports must be certified by the responsible official and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- D. The compliance certification shall include the following:
- i. The identification of each term or condition of the Significant Modification Permit that is the basis of the certification.
 - ii. The method(s) used for determining the compliance status of the source, currently and over the reporting period, and whether such method(s) provides continuous or intermittent data.
 - iii. The status of compliance with the terms and conditions of the Significant Modification Permit for the period covered by the certification, based on the method designated in Section D (ii) of this condition.
 - iv. Such other facts as the Air Pollution Control Officer may require in order to determine the compliance status of the source.
 - v. A method for monitoring the compliance of the stationary source with its emissions limitations, standards and work practices.

[District Rule 504 §10.0; 40 CFR 70.6(b)(5)]

18. The Permittee shall report within 24 hours of detection any deviation from a federally enforceable Title V permit condition. In order to fulfill the reporting requirement of this condition, the Permittee shall notify the Air Pollution Control Officer by telephone followed by a written statement within seven (7) days describing the nature of the deviation from the federally enforceable permit condition. *[District Rule 504 §5.0; 40 CFR 70.6(a)(3)(iii)]*
19. All monitoring data and support information required by a federally enforceable applicable requirement must be kept by the stationary source for a period of 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the federally enforceable applicable requirement in the Title V permit. *[District Rule 502 §10.0 and Rule 504 §3.0; 40 CFR 70.6(a)(3)(ii)]*

PUBLIC NUISANCE

20. The Permittee shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health or safety of any such persons or the public; or which cause or have a natural tendency to cause injury or damage to business or property. *[District Rule 104 §1.1]*

VISIBLE EMISSIONS

21. The Permittee shall not discharge into the atmosphere from any single source of emission, any air contaminant other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is:
- A. As dark or darker in shade as that designated No. 2 (3-minute average), on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - B. Of such opacity as to obscure a human observer's view, or a certified calibrated in-stack opacity monitoring system to a degree equal to or greater than forty percent (40%) opacity. *[District Rule 104 §2.0]*

PARTICULATE MATTER

22. A. General Combustion Sources

The Permittee shall not discharge particulate matter into the atmosphere from any combustion source in excess of 0.46 grams per standard cubic meter (0.20 grains per standard cubic foot) of exhaust gas, calculated to 12 percent carbon dioxide; or in excess of the limitations of NSPS (District Rule 104 §11.0, as applicable).

B. Steam Generating Units

The Permittee shall not discharge particulate matter into the atmosphere from any steam generating unit, installed or modified after July 1, 1976, in excess of 0.23 grams per standard cubic meter (0.10 grains per standard cubic foot) of

exhaust gas, calculated to 12 percent carbon dioxide; or in excess of the limitations of NSPS [District Rule 104 §11.0].

C. Steam Generating Utility Power Plants

Notwithstanding the limitations set out above, no steam generating power plants which produce electric power for sale to any public utility shall discharge particulate matter into the atmosphere in excess of 0.10 pounds per million BTU heat input or any other specific applicable permit limitation, whichever is the more restrictive emission condition.

D. Non-Combustion Sources

The Permittee shall not discharge particulate matter into the atmosphere from any non-combustion source in excess of 0.46 grams per actual cubic meter (0.20 grains per cubic foot) of exhaust gas or in total quantities in excess of the maximum allowable process weight rate as follows:

TABLE I

ALLOWABLE RATE OF EMISSION BASED ON PROCESS WEIGHT RATE					
Process Weight Rate			Rate of Emission		
Lb/Hr	Kg/Hr	Lb/Hr	Lb/Hr	Kg/Hr	Lb/Hr
100	45	0.55	6,000	2,720	8.6
200	92	0.88	7,000	3,380	9.5
400	183	1.4	8,000	3,680	10.4
600	275	1.83	9,000	4,134	11.2
800	377	2.22	10,000	4,540	12.0
1,000	454	2.58	12,000	5,460	13.6
1,500	681	3.38	16,000	7,260	16.5
2,000	920	4.1	18,000	8,220	17.9
2,500	1,147	4.76	20,000	9,070	19.2
3,000	1,362	5.38	30,000	13,600	25.2
3,500	1,690	5.96	40,000	18,100	30.5
4,000	1,840	6.52	50,000	22,700	35.4
5,000	2,300	7.58	60,000	27,200	40.0

Where the process weight per hour is between two listed figures, such process weight and maximum allowable particulate emission per hour shall be interpolated linearly. The total process weight of all similar process operations located at a single plant or of similar multiple plants located on a single premise, shall be used for determining the maximum allowable particulate emission from the combination of such operations.

[District Rule 104]

23. The Permittee shall not handle, transport or store or allow open storage of materials in such a manner which allows or has the potential to allow unnecessary amounts of particulate matter to become airborne. Reasonable precautions shall be taken to

prevent particulate matter from becoming airborne, including, but not limited to, the following:

- A. Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.
- B. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Containment methods can be employed during sandblasting and other similar operations.
- C. Conduct agricultural practices in such a manner as to minimize the creation of airborne dust.
- D. The use of water or approved dust surfactants for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- E. The application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- F. The paving of roadways and their maintenance in a clean condition.
- G. The prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

[District Rule 104 §4.0]

SULFUR COMPOUNDS

24. The Permittee shall not discharge into the atmosphere from any single source of emissions, sulfur oxides (calculated as sulfur dioxide (SO₂)) in excess of 1,000 ppm or in excess of the emission limitations of Federal New Source Performance Standards, as applicable. *[District Rule 104 §5.0]*

OPEN BURNING

25. The Permittee shall not ignite or cause to be ignited or suffer, allow or maintain any open outdoor fire for the disposal of rubber, petroleum or plastic wastes, demolition debris, tires, tar paper, wood waste, asphalt shingles, linoleum, cloth, household garbage or other combustible refuse, or for metal salvage or burning of motor vehicle bodies. No other open burning shall occur without the owner, operator(s) or Permittee having first obtained a Coordinated Authorized Burn Permit from the Air Pollution Control Officer. *[District Rules 201 & 203]*

EQUIPMENT BREAKDOWNS

26. The Permittee shall comply with the emergency provisions contained in all applicable federal requirements.
- A. Within two working days of the emergency event, the Permittee shall notify the Air Pollution Control Officer with a description of the emergency and any mitigating or corrective actions taken. *[District Rule 502 §9.0]*
 - B. Within two weeks of an emergency event, the owner(s), operator(s) or the responsible official shall submit to the Air Pollution Control Officer a signed contemporaneous log or other relevant evidence which demonstrates that:
 - i. An emergency occurred.
 - ii. Identification of the cause(s) of the emergency.
 - iii. The facility was being properly operated at the time of the emergency.
 - iv. Identification of each and every step taken to minimize the emissions resulting from the emergency.
 - C. The Permittee has the burden of proof to establish that an emergency occurred in any enforcement proceeding.

TITLE VI REQUIREMENTS (OZONE DEPLETING SUBSTANCES)

27. The Permittee shall not allow or cause the opening of appliances containing CFCs for maintenance, service, repair, or disposal unless first complying with the required practices set out pursuant to 40 CFR 82.156. *[40 CFR 82 Subpart F]*
28. Equipment used during the maintenance, service, repair, or disposal of appliances containing CFCs shall comply with the standards for recycling and recovery equipment set out in and pursuant to 40 CFR 82.158. *[40 CFR 82 Subpart F]*
29. The Permittee and its contractors and agents performing maintenance, service, repair or disposal of appliances containing CFCs must be certified by an approved technician certification program set out in and pursuant to 40 CFR 82.161. *[40 CFR 82 Subpart F]*

ASBESTOS

30. The Permittee shall comply with the standards of 40 CFR 61 Subpart M which regulates demolition and renovation activities pertaining to asbestos materials.

PAYMENT OF FEES

31. The Permittee shall pay an annual permit fee and other fees as required in accordance with District Regulation IV, Rule 406, Title V Fees. Failure to pay these fees by the dates due will result in immediate suspension of this Title V Permit to Operate effective on the date the fees were due, and on notification by the Air Pollution Control Officer of such suspension. Operation without an effective Title V permit subjects the Permittee to potential enforcement action by the District and the U.S. EPA pursuant District Rules and Section 502(a) of the Clean Air Act as amended in 1990. *[District Regulation IV Rule 406]*

ACCIDENTAL RELEASES

32. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the Permittee Title V permit shall register and submit to the U.S. EPA the required data related to the risk management plan (RMP) for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r) (3) of the CAA as amended in 68.130. The list of substances, threshold quantities and accident prevention regulations promulgated under Part 68 do not limit in any way the general duty provisions under Section 112(r)(1). *[40 CFR Part 68]*
33. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the Permittee shall comply with the requirements of 40 CFR Part 68 no later than the latest of the following dates as provided in 40 CFR 68.10(a):
- A. June 21, 1999,
 - B. Three years after the date on which a regulated substance is first listed under 68.130, or
 - C. The date on which a regulated substance is first present above a threshold quantity in a process. *[40 CFR Part 68]*
34. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the Permittee(s) shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68. *[40 CFR Part 68]*
35. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the Permittee(s) shall annually certify compliance with all applicable requirements of Section 112(r) as part of the annual compliance certification. This annual compliance certification shall be submitted and received no later than January 30th of each year. *[40 CFR Part 68]*

CONDITIONAL TRANSFER OF OWNERSHIP

36. In the event of any changes in control or ownership of these facilities, this permit together with its terms and conditions shall be binding on all subsequent owners and operators. The Permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the District, and which shall identify the exact effective date of the transfer of ownership.

The new owner(s) and operator(s) of this Title V source shall notify the Air Pollution Control Officer within 30 (thirty) days of the transfer of ownership and which notification shall include a certification by the responsible party that the Title V facility operations are to be operated in the same operational parameters as set out herein, and as before the transfer of ownership.

Any permit or written authorization issued pursuant herein shall not be transferable, by operation of law or otherwise, from one location to another, or from one person to another, unless such transfer occurs as a condition of this permit or as a modification to the permit and with written notification to the Air Pollution Control Officer within 30 (thirty) days of transfer of ownership.

SEVERABILITY

37. If any term or condition of this permit, for any reason, be adjudged by a court of competent jurisdiction to be invalid, such judgment shall not affect or invalidate the remainder of this permit. These permit conditions are enforceable individually and severally. *[40 CFR 60.6(b)(5); District Rule 504 §2.8]*

LOCAL ENFORCEABLE ONLY, GENERAL REQUIREMENTS

APPLICABILITY

38. The Permittee shall not cause or permit the construction or modification of any new source of air contaminants or modifications to an existing source, either minor or major, without first having obtained an Authority to Construct (ATC) permit from the Air Pollution Control Officer.

39. This permit is effective only upon payment of the permit fees set out in District Rules and Regulations.

ADMINISTRATION

40. This Permit is issued pursuant to California Health and Safety Code Section 42300. Commencement of any act or operation authorized by this Permit shall be conclusively deemed to be acceptance of all terms and conditions contained herein.

41. The Permittee shall comply with all conditions of this permit. Any violation of any condition of this Permit is a violation of District Rules and Regulations, and California State Law. *[District Rule 105 §1.0]*

42. The Permit Conditions shall be liberally construed for the protection of the health, safety and welfare of the people of the District. *[District Rule 100 §6.3]*

43. The District Rules and Regulations may be superseded or revised by the District Board with notice as required by state law. It is Permittee's responsibility to stay current with Rules and Regulations governing its business. The Permittee is therefore expected to, and shall, comply with all applicable Rules and Regulations. *[District Rule 100 §6.0; Rule 105 §1.0]*

44. Permit requirements apply to the facility owner and/or operator(s) and any contractor(s) or subcontractor(s) performing any activity authorized under this Permit. Any person(s) including contractor(s), subcontractor(s), not in compliance with the applicable permit requirements are in violation of State and Local laws, and are subject to appropriate civil and criminal penalties. The facility owner and/operator, and all contractor(s) or subcontractor(s) are strictly liable for the actions and violations of their employee(s). A violation committed by a contractor(s) or subcontractor(s) shall be considered a violation by the facility owner(s) and/or operator(s), and is also a violation by the contractor(s) and/or any subcontractor(s). *[District Rule 105 §5.0]*

45. Changes in plans, specifications, and other representations proposed in the application documents shall not be made if they will increase the discharge of emissions or cause a change in the method of control of emissions or in the character of emissions. Any proposed changes, regardless of emissions consequence, shall be submitted as a modification to this Permit. No modification shall be made prior to issuance of a permit revision for such modification. [*District Rule 102*]
46. Knowing and willful misrepresentation of a material fact in the application for the Permit, or failure to comply with any condition of the Permit, or of the District Rules and Regulations, or any state or federal law, shall be grounds for revocation of this Permit. [*District Rule 102*]
47. Permittee shall not construct, erect, modify, operate, or use any equipment which conceals the emission of an air contaminant, which would otherwise constitute a violation of the limitations of this Permit. [*District Rule 104 §1.2*]
48. This Permit does not convey any property rights of any sort, or any exclusive privilege.
49. The "Right of Entry", as delineated in District Rule 109 §1.0 and California Health and Safety Code Section 41510 of Division 26, shall apply at all times. Failure to grant immediate access to District, CARB, or other authorized personnel shall be grounds for permit suspension or revocation.
50. The APCO reserves the right to amend this Permit in order to ensure compliance with all applicable Federal, State and Local laws, Rules and Regulations or to mitigate or abate any public nuisance. Such amendments may include requirements for additional operating conditions, testing, data collection, reporting and other conditions deemed necessary by the APCO.
51. If any provision or condition of this Permit is found invalid by a court of competent jurisdiction, such finding shall not affect the validity or enforcement of the remaining provisions.
52. This Permit shall be posted in a conspicuous location at the site and shall be made available to District representatives upon request. [*District Rule 102 §8.0*]
53. The Permittee shall pay an annual permit fee and other fees as required in accordance with District Regulation IV. Failure to pay these fees will result in the forfeiture of this Permit. Operation without a permit subjects the source to potential enforcement action by the District. In the event of facility closure or change of ownership or responsibility, the new owner or operator shall be assessed and shall pay any unpaid fees. [*District Regulation IV - Fees*]
54. This Permit is not transferable from either one location to another, from one piece of equipment to another, or from one person to another, except as provided herein. In

the event of any change in control or ownership of the subject facility, the Permittee shall notify the succeeding owner of this Permit and its conditions; and shall notify the District of the change in control or ownership within fifteen (15) days of that change. [*District Rule 400 §5.0*]

55. A request for Transfer of Ownership of this Permit shall be submitted to the APCO prior to commencing any operation of the subject equipment and/or operations by any owner(s) and/or operator(s) not otherwise identified in this Permit. Failure to file the Transfer of Ownership constitutes a separate and independent violation, and is cause for voiding this Permit. The burden of applying for a Transfer of Ownership is on the new owner(s) and/or operator(s). Any Permit transfer authorized pursuant to a transfer of ownership request shall contain the same conditions as this Permit. [*District Rule 400 §5.0*]

56. For purposes of this Permit, the terms identified in the Definition Section shall have the meaning set out in District Rule 101 and as defined in the definition section of this permit. In the event of any conflict between Rule 101 and the permit definitions, the definitions section of this permit shall prevail.

EMISSIONS & OPERATION

57. This Permit does not authorize the emission of air contaminants in excess of those allowed by the federal Clean Air Act, California Health and Safety Code or the Rules and Regulations of the District. This Permit shall not be considered as permission to violate existing laws, ordinances, regulation or statutes of other governmental agencies.

58. Permittee shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health or safety of any such persons or the public; or which cause or have a natural tendency to cause injury or damage to business or property. The opacity limitation is in effect at all times, including but not limited to startup, shutdown, and malfunction. [*H&SC §41700; District Rule 104 §1.1*]

59. The Permittee shall not discharge into the atmosphere from any source whatsoever any air contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is as dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or of such opacity as to obscure an observer's view to a degree equal to or greater than Ringelmann 2 or forty (40) percent opacity. [*H&SC §41701; District Rule 104 §2.0*]

60. The handling, transporting, or open storage of material in such a manner which allows unnecessary amounts of particulate matter to become airborne shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne. [*District Rule 104 §4.0*]

61. All equipment regulated by this Permit shall at all times be maintained in good working order, and shall be operated as efficiently as possible so as to ensure compliance with all applicable emission limits. For purposes of compliance with this requirement, good working order, efficient operation, and proper maintenance shall mean the implementation of all protocols, procedures, and activities recommended by the device manufacturer or those required by this Permit.

RECORDS & TRAINING

62. The Permittee shall provide training and instruction to all affected contractor(s), subcontractor(s), and employee(s). Training shall include the identification of all the requirements contained within this Permit, and the appropriate method to be used to comply with the permit conditions. Training shall occur prior to any of the contractor(s), subcontractor(s), or employee(s) constructing or operating equipment authorized by this permit. Records documenting the persons receiving instruction and the instruction materials shall be made available to the APCO upon request. *[District Rule 105 §5.0]*

63. Permittee shall furnish to the APCO, within a reasonable time, any information that the District may request to determine compliance with this Permit or whether cause exists for modifying, revoking and reissuing, or terminating this Permit. Upon request, Permittee shall also furnish to the District copies of records required to be kept by this Permit. *[H&SC §42303; District Rule 103 §6.0]*

64. The Permittee shall record the following information in the event of an equipment breakdown or malfunction: date and time of event, event duration, description of event, identification of the cause of the event, identify what corrective measures were taken and if unsuccessful what additional measures should be taken in the future, and quantification of excess emissions released during the event. *[District Rule 105 §5.0]*

PERMIT TERM

65. Title V permit expiration terminates the Permittee's right to operate the stationary sources itemized in this permit unless a timely and complete Title V permit application for renewal has been submitted in accordance with District Regulation V Rule 502 §2.2, in which case the existing Title V permit will remain in effect until the Title V permit renewal has been issued or denied. *[40 CFR 70.7(c) (1)(ii)]*

FEDERALLY ENFORCEABLE, EQUIPMENT SPECIFIC REQUIREMENTS

The information specified under this section is enforceable collectively and severally by the District, U.S. EPA, and the public.

AUTHORIZED EQUIPMENT & CONFIGURATION

66. The Permittee is authorized to operate the equipment listed in the following tables.
[District Rule 504 §2.1]

Table 1.0 Authorized Emission Devices – Mat Forming Process

Device BP-1 Manufacturer Type Capacity Control Equipment SCC	Particle Board Press Washington Iron Works 6475 Ton Board Press 19.0 MSF of ¾" board per hour RD-1/2/3, MC-1/2/3, WESP-1/2/3, BFU-1 3-07-006-51
Device BC-1 Manufacturer Capacity Control Equipment SCC	Board Cooler Leckenby 19.0 MSF of ¾" board per hour None - Direct Vent to Atmosphere n/a
Device RM-1 Manufacturer Type Capacity Control Equipment SCC	Resin Mixer Littleford Paddle Mixer 340 gallons per hour None – Direct vent to Atmosphere n/a

Table 1.1 Authorized Control Devices – Mat Forming Process

Device CS-1 Manufacturer Model / Type Capacity Components Power Source Control Equipment SCC	Press Vent Collection System O & M Industries Custom Fabricated 165,000 dscfm Superstructure, Ductwork & Induction Fan Electricity RD-1/2/3, MC-1/2/3, WESP-1/2/3, BFU-1 n/a
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Table 1.2 Authorized Emission Devices – Wood Furnish Drying

Device RD-1	Green Rotary Dryer (Swing)
Manufacturer	Energex
Type	Direct wood fired
Capacity	22,000 oven dry lbs per hour, wood furnish
Heat Input Rating	35 MM Btu per hour
Fuel Type	Natural Gas, Wood (Sander Dust)
Control Equipment	MC-1, WESP-1, BFU-1
SCC	3-07-006-25, green softwood, inlet moisture content >50%
Device RD-2	Green Rotary Dryer (Core)
Manufacturer	Energex
Type	Direct wood fired
Capacity	22,000 oven dry lbs per hour, wood furnish
Heat Input Rating	35 MM Btu per hour
Fuel Type	Natural Gas, Wood (Sander Dust)
Control Equipment	MC-2, WESP-2, BFU-1
SCC	3-07-006-25, green softwood, inlet moisture content >50%
Device RD-3	Green Rotary Dryer (Face)
Manufacturer	Energex
Type	Direct wood fired
Capacity	22,000 oven dry lbs per hour, wood furnish
Heat Input Rating	35 MM Btu per hour
Fuel Type	Natural Gas, Wood (Sander Dust)
Control Equipment	MC-3, WESP-3, BFU-1
SCC	3-07-006-25, green softwood, inlet moisture content >50%

Table 1.3 Authorized Control Devices

Device MC-1	Multi-clone (Swing)
Manufacturer	North Coast Fabricators
Type	Custom Fabricated; multi-chamber in series
Capacity	45,000 scfm
Device MC-2	Multi-clone (Core)
Manufacturer	North Coast Fabricators
Type	Custom Fabricated; multi-chamber in series
Capacity	45,000 scfm
Device MC-3	Multi-clone (Face)
Manufacturer	North Coast Fabricators
Type	Custom Fabricated; multi-chamber in series
Capacity	45,000 scfm

Table 1.3 Continued

Device WESP-1 Manufacturer Type Design Production Capacity	Wet Electrostatic Precipitator (Swing) GeoEnergy, E-Tube Wet Tubular 189 tubes, 10" x 13', 65KV@600ma 45,000 scfm
Device WESP-2 Manufacturer / Model Type Design Capacity	Wet Electrostatic Precipitator (Core) GeoEnergy, E-Tube Wet Tubular 189 tubes, 10" x 13', 65KV@600ma 45,000 scfm
Device WESP-3 Manufacturer / Model Type Design Capacity	Wet Electrostatic Precipitator (Face) GeoEnergy, E-Tube Wet Tubular 189 tubes, 10" x 13', 65KV@600ma 45,000 scfm
Device BFU-1 Manufacturer Model Design Capacity	Bio-Filtration Unit Bio-Reaction Industries, LLC Built to Specifications Twin Chamber; Bio-Trickle & Bio-Matrix™ 184,000 scfm

67. The Permittee shall install and maintain ducting and air movers as necessary to convey the exhaust gases from the devices listed in the Authorized Equipment Section of this Permit to their respective air pollution control devices.
68. The Permittee shall install a safety bypass for each of the three WESPs.
69. The Permittee shall install thermocouples (or equivalent temperature measuring devices) at the following locations:
- a. In the blowpipe between the quench chamber and the WESP unit; and
 - b. At the inlet of each of the three dryers.
70. The Permittee shall install the following sampling and recording devices within the BFU and control room as appropriate. The devices shall meet or exceed the specifications of §63.2269.
- a. Temperature sensors – at representative locations in the chamber and bio-bed;
 - b. Differential Pressure – at the inlet and between the two chambers;
 - c. pH meters – at representative location in the bio-bed and in the sump; and
 - d. Data logger.
71. The Permittee shall install sampling ports on the control sequence at the following locations in accordance with 40 CFR §63.2262(d).
- a. Upstream of the inlet to BFU-1; and
 - i. At the outlet for the BFU-1, but prior to release to the atmosphere.
72. The Permittee shall install points of access to the Emission Devices, Control Devices, and Continuous Emission Monitoring Devices such that source testing in accordance with the appropriate reference test methods can be performed. All points

of access shall conform to the latest Cal-OSHA safety standards. For purposes of compliance with this part, appropriate test methods shall mean the test methods identified in the Testing and Compliance Monitoring Conditions section of this Permit. Sample collection ports shall be located in accordance with 40 CFR Part 60 Appendix A, and with the CARB document entitled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Emission Monitoring and Testing. *[NCUAQMD Rule 102 §5.0]*

73. The Permittee shall install sampling ports in the ductwork connecting Device CS-1 to Devices RD-1, RD-2, and RD-3 such that representative samples can be collected with the intent of estimating total flow. All sampling and measuring equipment shall be calibrated and maintained in accordance with manufacturer's specifications for optimum performance.

74. The exhaust stacks shall not be fitted with rain caps or any other similar device which would impede vertical exhaust flow. *[District Rule 102 §5.0]*

HEAT INPUT, FUEL, & PRODUCTION LIMITATIONS

75. The Permittee shall not operate the equipment subject to this permit in such a manner so as to exceed either of the following:
- a. The capacities listed in the Authorized Equipment and Configurations Section of this Permit.
 - b. The capacity specified in Table 2.0 Production Limits.

Table 2.0 Production Limits

PRODUCT	DEVICE	UNITS	LIMIT	
			Hour	Year
Particle Board	Board Press	MSF - ¾" Board	19.0	166,440
Wood Furnish	Each Dryer	Oven Dried Tons	11	96,360
	Facility Wide	Oven Dried Tons	29.4	257,544

76. The Permittee shall only manufacture Particleboard with the equipment listed in the Authorized Equipment & Configuration section of this permit utilizing the following types of raw materials.
- a. Modified Melamine-Formaldehyde Resin
 - b. Phenol-Formaldehyde Resin ($C_6H_6O.CH_2O$)_x
 - c. Urea-Formaldehyde Resin ($CH_4N_2O.CH_2O$)_x
 - d. Wax Emulsion – Petroleum hydrocarbon
 - e. Formaldehyde Scavenger – Aliphatic amide (CH_4N_2O)
 - f. Wood Particles

The Permittee may utilize additional material types if they are incorporated into the Device Operational Plans as required pursuant to the Operational Condition section this Permit. The BFU manufacturer must guarantee that the HAP destruction efficiency of the device will satisfy the 40 CFR Subpart DDDD of Part 63 when utilizing any of the materials used to manufacture products at the facility. Modification of any of the plans required pursuant to this permit is subject to prior District approval.

EMISSION LIMITING CONDITIONS

77. The Permittee shall not discharge particulate matter into the atmosphere from any combustion source in excess of 0.20 grains per cubic foot of dry gas calculated to 12 percent CO₂ at standard conditions. *[District Rule 104 §3.1]*
78. The Permittee shall not discharge sulfur dioxide into the atmosphere from any combustion source in excess of 1000 ppmv for any single device or more than 40 tons per year as a combination of all devices. *[District Rule 104 §5.0]*
79. The Permittee shall not discharge particulate matter into the atmosphere in excess of 40.0 pounds per hour, during any one hour, from the combination of all permit units which are a part of the Mat Forming Process. The Mat Forming Process is defined as the Particle Board Press, Board Cooler and Resin Mixers. *[Rule 104 §3.5]*
80. The Permittee shall operate devices BP-1, RD-1, RD-2, and RD-3 such that greater than a 90% destruction efficiency of formaldehyde is continuously achieved. *[40 CFR 63 Subpart DDDD]*
81. The Permittee shall not discharge nitrogen oxides (calculated as NO₂) from all permitted units which are a part of the Wood Drying Process (Core, Surface and Swing Dryers) in excess of 294 tons per year. Compliance with this condition will be determined on a monthly basis as a 12 month moving average. *[Authority To Construct dated June 11, 1990]*

82. The Permittee shall not discharge pollutants from the devices listed in the Authorized Equipment & Configuration Section of this Permit in excess of the limits identified in Tables 3.0 below.

Table 3.0 BFU-1 Exhaust, Criteria Pollutants

Pollutant	Lbs Per Hour	Tons Per Year
CO	115.5	450.7
NOx	67.1	294
PM10	19.8	86.5
VOC	38.8	151.3

OPERATIONAL CONDITIONS

83. The Permittee shall develop, implement and maintain a written Startup, Shutdown, and Malfunction Plan as described in 40 CFR 63.6(e)(3) that contains specific procedures for maintaining the equipment and devices listed in the Authorized Equipment Section of this Permit during periods of startup, shutdown, and malfunction. The Plan shall also include a specific program of corrective actions to be implemented in the event of a malfunction in either the process or control systems. The Plan shall be submitted to the District not less than thirty (30) calendar days prior to initial start-up of the equipment and devices listed in the Authorized Equipment Section of this Permit. The Plan is subject to APCO approval and the Permittee shall not operate the equipment and devices listed in the Authorized Equipment Section of this Permit unless a District approved Startup, Shutdown, and Malfunction Plan is in effect.

84. The Permittee shall develop, implement and maintain a written Device Operational Plan that contains specific procedures for operating the equipment and devices listed in the Authorized Equipment Section of this Permit under the varying load conditions which may occur during normal modes of operation. The Plan shall also include a specific program of corrective actions to be implemented in the event of a malfunction in either the process or control systems. This plan shall be consistent with the requirements of this Permit, and all local, state and federal laws, rules, and regulations. The plan shall include, but not be limited to, daily system integrity inspections and the recording of findings. The Plan is subject to APCO approval and the Permittee shall not operate the equipment and devices listed in the Authorized Equipment Section of this Permit, unless a District approved Device Operational Plan is in effect.

85. The Permittee shall develop, implement and maintain a written Device Maintenance & Inspection Plan that contains specific procedures for equipment inspection and identifies replacement intervals for components of the equipment and devices listed in the Authorized Equipment Section of this Permit. The Plan shall be submitted to the District not more than sixty (60) calendar days following initial start-up of the equipment and devices listed in the Authorized Equipment Section of this Permit. The Plan is subject to APCO approval and the Permittee shall not operate the equipment and devices listed in the Authorized Equipment Section of this Permit unless a District approved Device Maintenance & Inspection Plan is in effect.

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86. During startup and shutdown events of the devices listed in the Authorized Equipment Section of this Permit, the air conveyance system will remain active and the WESPs (WESP-1, WESP-2, and WESP-3) will remain energized such that at all times of production, the emissions captured by the Device CS-1 will be processed under optimal conditions in their respective air pollution control devices.
87. The Permittee shall only operate Devices BP-1 and BC-1 while Device CS-1 is leak free. For purposes of compliance with this condition, leak free shall be defined as follows:
- No single tear or hole in the press vent shroud that is greater than 6" in dimension;
 - Combined area of holes or tears in the press vent shroud shall not be in excess of ten square feet in area; and
 - No visible or audible leaks in the superstructure, ductwork, or shroud.
88. The Permittee shall direct the exhaust gases collected by Device CS-1 through at least one of the following control system pathway combinations prior to being discharged to the atmosphere:
- The Dryers, the Multiclones, the WESP, and then to the BFU.
 - Directly to the BFU.
89. The Permittee shall direct the exhaust gases emitted by the Devices RD-1, RD-2, and RD-3 through the multi-clones (MC-1, MC-2, and MC-3), the WESPs (WESP-1, WESP-2, and WESP-3), and then to the BFU-1 prior to being discharged to the atmosphere.
90. The Permittee shall activate the safety bypass of the WESPs (WESP-1, WESP-2, and WESP-3) when the device internal temperature exceeds 175°F. Device temperature shall be determined utilizing the thermocouples listed in the Authorized Equipment & Configuration Section of this Permit
91. The Permittee shall maintain all ducting, housings, fans, chambers, and exhaust stacks in a leak free state during all times of operation. Emissions of exhaust gases visible to the unaided human eye shall not occur at any point upstream of the final BFU-1 discharge point.
92. The Permittee shall continuously maintain ambient conditions within Device BFU-1 such that the internal environment is conducive to microbial and fungal growth. The Permittee shall identify the environmental parameters in the device operational, maintenance, and startup shutdown plans required pursuant to the Operational Conditions section of this Permit. Proper ambient conditions include but are not limited to:
- The internal temperature range is maintained within 0 °C >x<75 °C
 - The pH range of the bio bed and sump is maintained within 5.5 to 8.5.
 - A consistent air flow
 - The internal humidity range is maintained within 50% to 100%
 - A consistent source of nutrients is available.

93. The Permittee shall maintain the 24-hour block bio-filter bed temperature installed in Device BFU-1 within the range established below. Temperature values are 15 minute averages.
- a. Minimum of 105 °F, and
 - b. Maximum of 114° F.
 - c. The Permittee may request and the APCO may conditionally approve modification of the temperature range in accordance with §63.2262(m).
94. The Permittee shall maintain the Bio-Air Spheres™ and bio-bed installed in Device BFU-1 in accordance with manufacturer's specifications. In ten year intervals beginning on the date initial compliance with the PWCP NESHAP was demonstrated, the Permittee shall replace the Bio-Air Spheres™ and bio-bed according to one of the options listed below.
- a. Once every two years, the Permittee shall:
 - i. Notify the District of the intent to perform a survey of the bio-filter bed 30 days in advance of the proposed survey date.
 - ii. Cause an independent third party to perform a survey / inspection upon the bio-filter bed to determine Bio-Air Spheres™ integrity and bio-bed permeability according to manufacturer's guidelines and subject to APCO approval.
 - iii. The Permittee shall submit to the APCO a copy of the independent third party's assessment of Bio-Air Spheres™ integrity and bio-bed performance including recommendations for remediation, if any, in order to ensure optimum performance as recommended by the manufacturer. The report shall be submitted within 30 days after the inspection has been completed.
 - iv. Complete remediation activities on the Bio-Air Spheres™ and bio-filter bed as recommended by the inspection report and subject to APCO. Remediation shall be completed within 60 days after receipt of the inspection report.
 - v. Within 120 of the date the survey / inspection required in section a) ii) of this Condition is conducted, the Permittee shall submit to the District a compliance status report. Within 30 days of achieving compliance with this condition, the Permittee shall submit a statement certifying compliance with this Condition.
 - b. Once every ten years, the Permittee shall completely replace the entire volume of Bio-Air Spheres™.

95. The Permittee shall utilize an alkaline solution of water to flush the tubes in Devices WESP-1, WESP-2, and WESP-3 at a frequency determined to maintain the emissions of particulate in compliance with emission limitations of this permit. The value shall be determined during performance testing and shall be incorporated into the APCO approved Device Operational Plan.
96. The Permittee shall operate Devices WESP-1, WESP-2, and WESP-3 in a manner to reduce the maximum quantity of particulate matter emissions. The WESPs shall be energized with precipitator voltage inputs of at least 40KV when controlling exhaust gas particulate matter. Should more than two excursions below the 40 KV limit occur in any 24 hour period, the Permittee shall report the condition to the District in accordance with the breakdown reporting provisions of this permit, and shall initiate immediate corrective action. If alternate WESP operating parameters are determined during performance testing, the alternate values shall be incorporated into the APCO approved Device Operational Plan.

REPORTING & RECORDKEEPING

97. The Permittee shall report all occurrences of breakdowns of the equipment listed in the Authorized Equipment & Configuration Section of this Permit which result in the release of emissions in excess of the limits identified in this Permit. Said report shall be submitted to the District in accordance with the timing requirements of NCUAQMD Rule 105 §5.0.
98. The Permittee shall maintain a Breakdown log that describes the breakdown or malfunction, includes the date and time of the malfunction, the cause of the malfunction, corrective actions taken to minimize emissions and the date and time when the malfunction was corrected. *[NCUAQMD Rule 102 §5.0]*
99. The Permittee shall immediately record the following information when an event occurs where emissions from the equipment listed in the Authorized Equipment & Configuration Section of this Permit are in excess of any limits incorporated within this permit:
- a. Date and time of the excess emission event
 - b. Duration of the excess emission event
 - c. Description of the condition or circumstance causing or contributing to the excess emission event
 - d. Emission unit or control device or monitor affected
 - e. Estimation of the quantity and type of pollutants released
 - f. Description of corrective action taken
 - g. Actions taken to prevent reoccurrence of excess emission event
100. The Permittee shall provide notification and record keeping as required pursuant to 40 CFR §63.2280.

101. The Permittee shall continuously maintain onsite, the records listed in Table 7.0 below, for the most recent five year period. Said records shall immediately be made available to the District upon request.

Table 7.0 Required Records

Frequency	Information to be Recorded
Upon Occurrence	<ul style="list-style-type: none"> A. Records of Maintenance Performed on Authorized Equipment B. Time and Duration for Each Device Startup C. Time and Duration for Each Device Shutdown D. Replacement & Maintenance Activities Associated with the Bio-Bed E. Safety Bypass of WESPs
At least one electronic reading every 15 minutes	<ul style="list-style-type: none"> A. BFU-1 Bio-Bed & Chamber Temperature (°F) B. BFU-1 Differential Pressures (at inlet and between chambers) C. pH of Bio-Bed and Sump D. Dryer Temperature (°F) for Each Dryer
Hourly	<ul style="list-style-type: none"> A. Press Board Production Rate Normalized to MSF ¾" board (hourly average basis) B. Wood Furnish dried in the Dryers C. Dryer Temperature (°F) - Hourly Average
Daily	<ul style="list-style-type: none"> A. Hours of Operation B. Quantity of Board Feet of Product Produced C. Resin Used (Gallons)
Monthly	<ul style="list-style-type: none"> A. Hours of Operation B. Dryer Temperature (°F) – Average of hourly average values observed during operation C. NOx (tons) – calculated as a 12 month moving average D. Quantity of Sander Dust Burned in each Dryer (Bone Dry Tons) E. Quantity of Natural Gas Burned in each Dryer (Bone Dry Tons)
Quarterly	<ul style="list-style-type: none"> A. Gas Flow in CS-1 Ductwork (acfm)
Annually	<ul style="list-style-type: none"> A. Emissions of CO (tons) B. Emissions of CO₂ (tons) C. Emissions of NOx (tons) D. Emissions of PM_{2.5} (tons) E. Emissions of PM₁₀ (tons) F. Emissions of HAPs (tons)

102. The Permittee shall continuously maintain onsite for the most recent five year period and shall be made available to the District upon request, the records as listed in Table 8.0 below.

Table 8.0 Required Reports

Frequency	Information to be Reported
<p>Upon Occurrence</p>	<p>A. Safety Bypass of WESPs B. Equipment Breakdown or Malfunction C. Excess Emission Event</p>
<p>Monthly (By the 15th of the following Month)</p>	<p>A. Hours of Operation B. Dryer temperature C. NOx (tons) – calculated as a 12 month moving average D. Quantity of Board Feet of Product Produced Normalized to MSF ¾” Board</p>
<p>Annually (By the January 31st of the following Year)</p>	<p>A. Emissions of CO (tons) B. Emissions of CO₂ (tons) C. Emissions of NOx (tons) D. Emissions of PM_{2.5} (tons) E. Emissions of PM₁₀ (tons) F. Emissions of HAPs (tons) G. Number of Hours of Operation H. Number of Operating Days I. Quantity of Board Feet of Product Produced Normalized to MSF ¾” Board J. Quantity of Sander Dust Burned by Each Dryer (Bone Dry Tons) K. Quantity of Natural Gas Burned by Each Dryer (Bone Dry Tons)</p>

103. The Permittee shall maintain records of all inspections of equipment integrity and visible emissions. The records shall, at minimum, include:

- a. Date and time of inspection;
- b. Presence or absence of visible emissions or defects;
- c. Duration of visible emissions or defect condition;
- d. Description of event causing the visible emissions or defect;
- e. Visible Emissions Evaluations conducted;
- f. Identification of VEE observer / inspector;
- g. Description of corrective action; and
- h. Action taken to minimize the reoccurrence of visible emissions or defect.

104. The Permittee shall annually prepare and submit a comprehensive facility wide emission inventory report for all criteria pollutants and toxic air contaminants emitted from the facility. The inventory and report shall be prepared in accordance with the most recent version of the CAPCOA / CARB reference document *Emission Inventory Criteria Guidelines*. The inventory report shall be submitted to the NCUAQMD APCO no later than March 1st of the following calendar year. The inventory report is subject to NCUAQMD APCO approval. [NCUAQMD Rule 102 §5.0]

TESTING & COMPLIANCE MONITORING

105. Not less than sixty days prior to the date of any source test required by this Permit, the Permittee shall provide the District with written notice of the planned date of the test and a copy of the source test protocol.
106. The Permittee shall demonstrate compliance with all the emission limits identified in this Permit for Devices BP-1, CS-1, RD-1, RD-2, and RD-3 using the methods listed below at least once per calendar year unless an alternate frequency is specified below. All compliance tests shall be conducted at an operating capacity of 95% or greater of the maximum operating capacity of the device. All runs performed during the source tests shall be referenced in the test report, but only the first three valid runs shall be counted in the run-averaging determination of compliance. Alternative test methods may be approved by the APCO. *[District Rule 102 §5.0]*
- a. Particulate Matter – CARB Method 5 (front and back half);
 - b. Visible Emissions - Permittee shall perform a “Visible Emission Evaluation” (VEE) concurrent with particulate matter testing. A CARB certified contractor shall perform such an evaluation;
 - c. Nitrogen Oxides – CARB Method 100;
 - d. Carbon Monoxide – CARB Method 100;
 - e. Oxygen – CARB Method 100; and
 - f. HAPs - The Permittee shall perform testing in accordance with Table 5 and Table 7 to Subpart DDDD of Part 63. Testing required is limited to the HAPs identified by Subpart DDDD. Testing shall be performed:
 - i. At intervals no greater than 2 years in length; or
 - ii. Within 180 days after a replacement of any portion of the bio-filter bed media with a different type of media or replacement of more than 50 percent (by volume) of the bio-filter bed media with the same type of media.
107. The Permittee shall describe operating conditions, which occurred during the performance test, in the performance test report for the process and control systems. The Permittee shall explain why the conditions reported are representative of normal operations. The Permittee shall record and include in the final report the following parameters during compliance testing:
- a. Press Board production rate normalized to MSF ¾” board;
 - b. Board Cooler production rate normalized to MSF ¾” board;
 - c. Resin Mixer flow rate;
 - d. Primary and secondary amperage of the Transformer Rectifier (TR) set
 - e. Primary and secondary voltage of Transformer Rectifier (TR) set
 - f. Spark rate in each WESP field
 - g. WESP Caustic Wash Flow Rate and pH
 - h. Exhaust stack opacity

108. Source test results shall be summarized in a written report and submitted to the APCO directly from the independent source testing firm on the same day, the same time, and in the same manner as submitted to Permittee. Source Test results shall be submitted to the District no later than 60 days after the testing is completed.
109. The Permittee shall measure the Dryer inlet temperature for Devices RD-1, RD-2, and RD-3 utilizing the sampling devices specified in the Authorized Equipment & Configuration Section of this Permit. Readings shall be taken at a frequency of once every 6 seconds and the one minute average of readings recorded by a computer data acquisition system (data logger).
110. The Permittee shall demonstrate compliance with 12 month rolling average NOx emission limits according to the following procedures.
- a. The Permittee shall identify the correlation between NOx emissions released at the BFU-1 stack with Dryer inlet temperatures. Testing of NOx shall be performed at a minimum of three different Dryer inlet temperatures.
 - b. The following methodology shall be used to determine the maximum allowable drier inlet temperature:
 1. Generate a "least squares equation" for each drier comparing lbs/hr nitrogen oxides emissions and average drier inlet temperature.
 2. Determine the average equation for all driers for the individual least square equations.
 3. From the maximum emission rate of nitrogen oxides of 294 tpy (67.2 lbs/hr at 24 hours per day and 365 days per year), determine the average drier inlet temperature from step 2. This value represents a 12 month moving average of temperature, expressed as a monthly value.
111. The Permittee shall determine WESP (WESP-1, WESP-2, and WESP-3) temperature by using the thermocouple listed in the Authorized Equipment & Configuration Section of this Permit. The Thermocouple shall be calibrated at least once each calendar year using a thermocouple standard or similar device approved by the District. The calibration procedure and frequency shall be incorporated into the Device Maintenance & Inspection Plan.
112. The Permittee shall quantify the volume of gas flow in the ductwork which connects Device CS-1 to the Devices RD-1, RD-2, and RD-3 utilizing the measuring devices listed in the Authorized Equipment Section of this Permit on a quarterly basis. Measurements shall be conducted according to procedures and methodology identified in the Device Maintenance & Inspection Plan. If the gas flow in the ductwork downstream of Device CS-1 and upstream of the air movers (fans) is outside the established ranges, the Permittee shall report the incident to the APCO within 24 hours of detection. The Permittee shall develop and then submit a plan of corrective action to the APCO for approval. The Permittee shall effect repairs and undertake corrective actions in accordance with the APCO approved plan.

COMPLIANCE SCHEDULE

113. The Permittee shall fully comply with Order of Abatement 2008-1 issued by the District Hearing Board on December 10, 2009 and any amendments issued thereafter.
114. The Permittee shall install a Continuous Emissions Monitor (CEM) to measure the emissions of NO_x which are discharged from the BFU-1 stack. The following activities shall be completed according to the timelines listed.
- a. Permittee shall submit to the District an Authority to Construct application for the installation of the CEM system on or before October 1, 2011. The CEM system proposed shall conform to the requirements of 40 CFR 60, Appendix B, Performance Specification 2.
 - b. The CEM system shall be installed and shall be fully operational on or before December 31, 2011. The Permittee may petition, and the APCO may approve, a one time extension of the deadline for a maximum of 12 months. The extension may only be granted upon demonstration of good cause by the Permittee.
 - c. The Permittee shall subject the CEM system to a Relative Accuracy Test Audit (RATA) in accordance with the requirement of 40 CFR 60, Appendix B on or before December 31, 2011.
 - d. Once the CEM system has successfully completed the RATA, the Permittee shall utilize the emissions data collected by the CEM system to demonstrate compliance with the NO_x twelve month moving average limitation of 294 tons per year. The Permittee shall continue to report the data collected by the dryer temperature NO_x emission estimation method until the Title V Permit to Operate is amended.
 - e. Relative accuracy test audits (RATAs) shall be performed the CEM system at least once every twelve months, in accordance with the requirements of 40 CFR 60, Appendix B. Calibration Gas Audits of the CEM system shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The APCO shall be notified in writing at least 30 days in advance of the scheduled date of the audits. Audit reports shall be submitted along with quarterly compliance reports to the APCO within 60 days after the testing was performed.
115. The Permittee shall implement the following activities by the dates indicated with regard to the measurement of gas flow in the ductwork between Device CS-1 and RD-1, RD-2, and RD-3:
- a. Permittee shall develop methodologies and procedures for measuring the gas flow in the ductwork and shall submit an amended Device Maintenance & Inspection Plan reflecting these procedures as expeditiously as possible, but in no event later than June 1, 2010. The procedures shall include requirements for the inspection of all ductwork and superstructure, and for the establishment of flow rates for all normal modes of press operation.

- b. The Permittee shall begin performing the quarterly inspections of this Device during the third quarter of 2010. The inspection shall be conducted and all the necessary reports completed and submitted to the District on or before October 1, 2010.

LOCAL ENFORCEABLE ONLY, EQUIPMENT SPECIFIC REQUIREMENTS

Section Reserved For Future Use

AUTHORIZING SIGNATURE

**NORTH COAST UNIFIED
AIR QUALITY
MANAGEMENT DISTRICT**

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DATE: _____

BY: _____

**RICHARD L. MARTIN JR.
AIR POLLUTION CONTROL OFFICER**



Permit Seal