

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

2300 Myrtle Avenue, Eureka, CA 95501

Phone: (707) 443.3093

Fax: (707) 443.3099



ENGINEERING EVALUATION FOR PROPOSED SIGNIFICANT MODIFICATION OF TITLE V PERMIT TO OPERATE NCU 047-12 THE HUMBOLDT FLAKEBOARD HAP REDUCTION PROJECT

APPLICATION #: NCU 047-12; HFP
EVALUATION DATE: April 15, 2010
EVALUATION BY: Jason L. Davis

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ATTACHMENTS

Authority To Construct Permits 607-1 and 608-1

Engineering Evaluation for Permit 607-1 and 608-1

Emission Calculations

FACILITY NAME

Humboldt Flakeboard Panels, Inc.

SIC Code: 2493

SCC Code: 3-07-006-04

LOCATION OF EQUIPMENT

The facility is located within a 4 acre complex at 4700 West End Road, Arcata California outside of Arcata city limits. The equipment modifications are sited within the boundaries of the existing facility.

INTRODUCTION

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).

APPLICATIONS SUBJECT TO REVIEW

On May 21, 2009, Humboldt Flakeboard Panel submitted an application for a significant modification of their existing Title V Permit To Operate. The application included a request to convert the Authority to Construct Permits 607-1 and 608-1 into Permits to Operate and requested the District consider a series of modifications to existing permit conditions. The requested modifications included the following.

- Collection of board cooler emissions. [*Condition #33, ATC 607-1*]
- Monitoring of air flow in press vent collection system ductwork [*Condition #35, ATC 607-1*]
- Wet Electrostatic Precipitator waste water treatment [*Conditions #36 and #56, ATC 608-1*]
- Ductwork Integrity [*Condition #52, ATC 608-1*]
- Bio-AirSpheres™ replacement interval [*Condition #55, ATC 608-1*]

Each of the subject areas raised by the applicant will be addressed in the sections that follow. Additionally, the District has proposed a series of modifications which will be discussed in the corresponding section.

Collection of Board Cooler Emissions

In order to comply with the Plywood and Composite Wood Product NESHAP, HFP submitted an application for a HAP emissions reduction project which was designed to achieve greater than 90% destruction of either formaldehyde or methanol. Based upon emission inventory data supplied by the applicant, the collection and destruction of board cooler emissions was necessary in order to achieve the necessary 90% facility wide reduction of HAPs. The original ATC provided the option for the facility to construct either a “wood products enclosure” or a collection system capable of consistently achieving a capture efficiency of greater than or equal to 95 percent. HFP has taken the position that the NEHSAP doesn’t require the board cooler emissions to be captured and so has requested deletion of the requirement. The District is proposing to revise the condition as follows.

- ~~33. The Permittee shall construct a Collection System designed to capture particulate and HAP emissions from the particle board press and board coolers. The Collection System shall meet at least one of the following criteria [40 CFR §63.2240(b):~~
- ~~a. A wood products enclosure meeting the definition of 40 CFR §63.2292.~~
 - ~~b. A collection system capable of consistently achieving a capture efficiency of greater than or equal to 95 percent.~~

66. The Permittee is authorized to operate the following equipment. [District Rule 504 §2.11]

Table 1.1 Authorized Control Devices – Mat Forming Process

Device CS-1	Press Vent Collection System
Manufacturer	O & M Industries
Model / Type	Custom Fabricated
Production Capacity	165,000 dscfm
Components	Superstructure, Ductwork & Induction Fan
Power Source	Electricity
Control Equipment	RD-1, MC-1, WESP-1, BFU-1
SCC	n/a

Only the press vent emissions are identified in Table 1.1 as being collected by Device CS-1.

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

Monitoring Air Flow in Press Vent Collection System Ductwork

The press vent collection system is required to consistently achieve a capture efficiency of greater than or equal to 95 percent. The device was subjected to a performance testing where the equipment was operated under normal operational parameters and the volume of air flow required (ventilation rate) necessary to achieve the 95 percent efficiency was determined. In order to ensure long term consistent compliance, the unit is subject to parametric monitoring requirements. In the original ATC, a sampling device referred to as a "flow meter" was required to be installed. In lieu of the flow meter, the applicant has proposed to utilize a portable sampling device to measure total air flow on a quarterly basis. The District intends to modify the conditions as follows.

- ~~35. The Permittee shall install an air flow meter at the following locations:~~
- ~~a. In the ductwork which directly connects the Collection System to the BFU;~~
 - ~~and;~~
 - ~~b. In the ductwork which connects the Collection System to the Dryers~~

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.

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.

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.

WESP Waste Water Treatment

The application for Authority To Construct permits indicated that all of the water utilized by the WESPs would be routed to the BFU where HAP destruction would occur. Project design was altered midway through the construction process such that the WESP Clarifier remains as the surge tank for the wet control system leaving the Clarifier open to the atmosphere.

The applicant has asserted that the waste water generated by the WESPs is not subject to control by the PWCP MACT. District staff conferred with EPA on the issue describing the control sequence configuration. EPA opined that the regulation afforded the permitting District the authority to condition the permit such that the initial sampling for HAPs occur upstream of the wet control device and also at the outlet of the BFU. The District expressed the need to acquire additional data to characterize the components of

the waste stream and provided HFP with two options: 1) Sample the exhaust at a location upstream of the WESPs, or 2) Collect water samples from the WESP waste water treatment system and determine HAP content. HFP selected the water sample collection option. The results of the sample analysis are included in the Appendix to this evaluation. The District will not require additional sampling at this time. However, the US EPA is reviewing the PWCP MACT to determine if additional measures are required in order to adequately control emissions from HAPs from waste water treatment systems at PWCP facilities. If additional modifications are necessary, they will be the subject of future permitting actions. The resulting modifications to the conditions are listed below.

~~36. The Permittee shall install ducting and piping necessary to convey all of the WESP process water to the BFU sump.~~

~~56. The Permittee shall not operate the equipment listed in the Authorized Equipment & Configuration section of this permit unless all of the WESP process water is discharged to the BFU sump.~~

Ductwork

The facility has an extensive system of ductwork which transports exhaust gases from the emitting unit to various control devices. There are several regulatory emission limits established for these exhaust streams. In order to ensure compliance with the established emission limits, it is necessary that the duct work be maintained in a leak free state to ensure long term consistent compliance with the emission limits. Accordingly, the District included the following condition in the ATC Permits.

“91. All ducting, housings, fans, chambers, and exhaust stacks shall be maintained 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 discharge point.”

The applicant has requested that this requirement be removed and instead included as a requirement in the Device Operational & Maintenance Plan for the appropriate device. The District concurs that the topic should be addressed in the appropriate device Plan, however, consistent compliance with the emission limits is required. The District proposes to retain the original language as condition #91 in the Significant Modification Permit.

Bio-AirSpheres™ Replacement Interval

As part of the ATC application, the applicant supplied the operations manual for the Bio-Filtration Unit. The manual states that manufacturer's warranty is for a period of ten years and recommended that the Bio-Air Spheres™ be replaced at that interval. However, after further consultation with the manufacturer, the applicant believes that the Bio-Air Spheres™ will perform adequately for an extended period of time. The District has incorporated flexibility into condition #94 allowing for an extended service interval if a biennial evaluation is performed and the recommended maintenance is completed.

~~55. The Permittee shall maintain the Bio-AirSpheres™ in accordance with manufacturer's specifications. The Permittee shall completely replace the Bio-~~

AirSpheres™ at least once every ten years.

94. The Permittee shall maintain the Bio-Air Spheres™ 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™ 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. Perform a survey upon the bio-filter bed to determine Bio-Air Spheres™ integrity according to manufacturer's guidelines and subject to APCO approval.
 - iii. Perform remediation on the bio-filter bed as recommended by the manufacturer and subject to APCO approval.
 - iv. The Permittee shall submit to the APCO a copy of the manufacturer's assessment of Bio-Air Spheres™ integrity and recommendations for remediation, if any within 60 days after the inspection has been completed.
 - v. Within 90 days after the submission of the report required in section iii, the Permittee shall submit a statement of certification that the recommended remediation, if any, has been completed according to manufacturer's specifications.
- b. Once every ten years, the Permittee shall completely replace the entire volume of Bio-Air Spheres™.

DISTRICT INITIATED MODIFICATIONS

Production Limitations

The applicant originally reported the maximum capacity of the process equipment for both short term (hourly) and long term (weekly) basis. After consultation with Facility staff, the applicant obtained new production capacity data and has forwarded appropriate documentation to the District. In light of this information, the applicant has requested the true production values be reflected in the permit and that the emission limits be revised accordingly. The District proposes to modify the production limit table as follows.

~~39. The Permittee shall not operate the equipment subject to this permit in such a manner so as to exceed the production limits specified in Table 2.0 Production Limits.~~

~~Table 2.0 Production Limits~~

SOURCE	LIMIT	UNITS
Each Dryer	22,000	Oven Dried lbs/hr
Facility Wide	25.2	Oven Dried Tons/hr

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

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

Emissions Calculations

The primary purpose of the project was to demonstrate compliance with the PWCP NESHAP by achieving a 90% reduction in HAPs emitted by the facility. The significant particulate matter and volatile organic carbon emission reductions were achieved by utilization of additional control technology and incineration in the process dryers.

The table below reflects the annual emissions limits from the devices post modification and the net change in emissions compared to operations “pre-project”. Additional information and calculations are found in the engineering evaluation for ATC #445-1 (Attachment A). Default emission factors from EPA AP42 and Appendix B to 40 CFR Part 63 DDDD were used to estimate the emissions from the facility. When appropriate, site specific emission data was utilized. Note that the values listed here differ from the values in the significant modification application. The values submitted by the applicant were prepared based upon actual emissions. The values listed in the evaluation are regulatory or “allowable” emissions.

Criteria Pollutants

The hourly criteria pollutant emission limits for CO, PM10, and VOCs were calculated utilizing the following equation.

$$Pollutant\ Emission\ Factor \times Maximim\ Activity\ Rating\ of\ Device \\ \times 8,760\ Hours\ Per\ Year = Annual\ Potential\ to\ Emit\ for\ the\ Device$$

The annual criteria pollutant emission limits for CO, PM10, and VOCs were calculated utilizing the equation above where “maximum activity for the device” was determined based upon the following relationship. The particle board production process is continuous, meaning there are no points in the production process where inventory of feedstock can accumulate. The applicant has identified the particle board press as the “bottleneck” of the process line producing 19.0 MSF of ¾” board and consuming 29.4 oven dried tons of wood furnish at maximum capacity.

AP42 Emission Factors for Particleboard Manufacturing

Device	Pollutant	Emission Factor	
Green Rotary Dryer	CO	3.5 lbs/ ODT	-
	PM	0.64 lbs / ODT	-
	NOx	-	Based upon PSD Limit
	VOC	0.9 lbs/ODT	-
Particle Board Press	PM	0.0492 MSF ¾" Board	Reduced 80% - WESP
	VOC	0.825 MSF ¾" Board	Reduced 25% - Incineration

The annual limit for oxides of nitrogen (NOx) was established in a previous Prevention of Significant Deterioration Permit for the facility. The 294 ton limit is a 12 month rolling average which can be converted to an hourly limit of 67.1 lbs per hour based upon the following equation.

$$\text{Annual NOx Limit} \div 8,760 \text{ Hours per Year} = \text{Allowable Pounds per Hour}$$

The following two tables contain the criteria pollutant limits listed by device.

Device	Pollutant (Lbs/Hr)			
	CO	NOx	PM10	VOC
RD-1	34.3	22.4	6.272	8.82
RD-2	34.3	22.4	6.272	8.82
RD-3	34.3	22.4	6.272	8.82
BP-1	-	-	0.935	8.1

Device	Pollutant (Tons/Yr)			
	CO	NOx	PM10	VOC
RD-1	150.2	98	27.5	38.6
RD-2	150.2	98	27.5	38.6
RD-3	150.2	98	27.5	38.6
BP-1	-	-	4.1	35.4

The exhaust gases from all of the equipment subject to this review are discharged through the BFU main stack. The combined allowable discharges are listed in the table below.

Pollutant	Lbs Per Hour	Tons Per Year
CO	115.5	450.7
NOx	67.1	294
PM10	19.8	86.5
VOC	35.6	151.3

Prior to the project, particulate and VOC fugitive emissions were released directly to atmosphere, uncontrolled, through vents in the building roof. The Permit will require that the press emissions be collected and then routed to the dryers where 25% of the gases are used as combustion air for the devices. The applicant has estimated and the

District concurs that 25% of the press VOC emissions are destroyed in the dryer combustion zone. The District has elected to modify the default emission factor for VOC to reflect the percentage reduction. The corresponding decrease in allowable VOC emissions represents 11.8 ton per year decrease.

In a similar fashion, the now collected particulate matter is routed through a series of control devices where the applicant has estimated and the District concurs that upwards of 80% control is achieved. The District has elected to modify the default emission factor for PM10 to reflect the percentage reduction. The corresponding decrease in allowable PM10 emissions represents 16.4 ton per year decrease.

The following table will be used to generate the public notice for this project. The facility may elect to apply for emission reduction credits within one year of achieving the reduction.

Pollutant	Annual Emissions Limit Tons per Year	Change in Emissions in tons per year “-” denotes a reduction
Carbon Monoxide (CO)	450.7	no change
Oxides of Nitrogen (NOx)	294	no change
Oxides of Sulfur (SOx)	0.0	no change
Particulate Matter (PM10)	86.5	-16.4
Volatile Organic Carbon (VOC)	151.3	- 11.8

Hazardous Air Pollutants

The Authority To Construct permits included mass emission limits for Hazardous Air Pollutants (HAPs). Upon further review of the emission estimates presented in the ATC application, the District has concluded that the techniques utilized to prepare the estimates did not provide results with sufficient accuracy with which to base regulatory mass emission limits. Accordingly, HAP mass emission limits will not be required at this time.

Table 3.1 Emission Limitations - HAPs

Pollutant	Tons Per Year
Formaldehyde	2.3
Methanol	4.5
Phenol	0.78
Acetaldehyde	0.78
Acrolein	0.39
Benzene	0.24

Compliance Schedule

As previously discussed, the District Hearing Board has issued an Order of Abatement that requires the Permittee to comply with the PWCP MACT and to complete a series of supplemental environmental projects as part of a settlement agreement. Toward that end, the District is proposing to incorporate the following conditions to ensure long term consistent compliance with the PWCP MACT and with criteria pollutant emission limits.

112. 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.
113. The Permittee shall install a Continuous Emissions Monitor (CEM) to measure the emissions of NOx 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.
 - 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 NOx twelve month moving average limitation of 294 tons per year. The Permittee shall continue to report the data collected by the dryer temperature NOx 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.
114. 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.

BFU Monitoring & Operating Parameters

Construction on the BFU has concluded and performance testing has been completed. The PWCP MACT requires that operational parameters for the bio-bed be established and that they be consistently maintained while the emitting units are in operation. The District proposes to make the following modifications to ensure compliance.

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.

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 recorded shall be 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).

California Environmental Quality Act

The California Legislature enacted the California Environmental Quality Act (CEQA) in 1970 as a means to require public agency decision makers to document and consider the environmental implications of their actions. CEQA compels agencies to identify the environmental effects of potential projects (actions), to determine whether they are significant, and then require the effects to be mitigated either through the imposition of feasible measures or through the selection of alternatives. There are several types of environmental review documents, each of varying complexity, which may be prepared to record the agency's decision making process. CEQA affords the public the opportunity to comment on proposed projects and requires the agency to respond in writing.

The Air Pollution Control Officer (APCO) has proposed to modify the Title V Permit To Operate for this facility. The modifications proposed result in both physical and operational changes to the facility and principally consists of the Hazardous Air Pollutant (HAP) emission reduction project described in the evaluation. As the HAP reduction project will result in the reduction of air pollutants emitted to the atmosphere, the APCO has determined that the project will not have a significant effect on the environment. Having made such a finding, in accordance with District Rule 103 §11.0 and Appendix A of the District Rules, no further action is necessary.

Miscellaneous

The following modifications are proposed to add clarity or further define the compliance approach utilized.

87. 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 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.

The Permittee shall not discharge particulate matter into the atmosphere in excess of ~~29.25~~ 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]

88. 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:

- a. No single tear or hole in the press vent shroud that is greater than 6" in dimension;
- b. Combined area of holes or tears in the press vent shroud shall not be in excess of ten square feet in area; and
- c. No visible or audible leaks in the superstructure, ductwork, or shroud.

~~107. The Permittee shall submit a health risk assessment protocol to the NCUAQMD APCO for review no later than 12 months after the Initial Performance Test has concluded. [NCUAQMD Rule 102 §5.0]~~

CONCLUSION

The proposed modifications described in this evaluation should not impede or preclude the applicant's ability to comply with all local, state, and federal emission requirements when the equipment is operated in accordance with the Authority To Construct Permits 607-1 and 608-1. Further, staff has evaluated the information presented by the applicant and applicable rules and regulations, and believes sufficient evidence exists for the APCO to make the determinations required under District Regulation V, and to issue the proposed significant modifications to Title Permit To Operate NCU 047-12.

Evaluation Prepared By: _____ Date: _____

Jason L. Davis, Division Manager