



DPI
DECORATIVE PANELS
INTERNATIONAL

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JUN 18 2020

MACES MAERS
FILE App No. 202000103

June 17, 2020

Mr. Shane Nixon
District Supervisor
Michigan EGLE
Air Quality Division
2100 W. M-32
Gaylord, MI 49735-9282

Subject: Renewable Operating Permit MI-ROP-B1476-2015a Renewal

Dear Mr. Nixon:

Attached please find the required documentation for the renewal of the Title V operating permit for the Decorative Panels International ("DPI") Alpena mill. This transmittal was also electronically sent for administrative review. This packet includes:

- ROP Application Form (with original signature of responsible official)
- ROP Mark-up
- Supplemental Data and Plans referenced in the ROP

Should you have any questions on the contents of this packet, please feel free to call me at 989-356-8532.

Sincerely,
Decorative Panels International

Scott Ickes
Senior Manager, Compliance



RENEWABLE OPERATING PERMIT RENEWAL APPLICATION FORM

JUN 18 2020

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Refer to the instructions for additional information to complete the Renewable Operating Permit Renewal Application Form.

FILE App No. 203000103

GENERAL INSTRUCTIONS

This application form should be submitted as part of an administratively complete application package for renewal of a Renewable Operating Permit (ROP). This application form consists of nine parts. Parts A – H must be completed for all applications and must also be completed for each section of a sectioned ROP. Answer all questions in all parts of the form unless directed otherwise. Detailed instructions for this application form can be found at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

PART A: GENERAL INFORMATION

Enter information about the source, owner, contact person and the responsible official.

SOURCE INFORMATION

SRN B1476	SIC Code 2493	NAICS Code 321219	Existing ROP Number MI-ROP-B1476-2015a	Section Number (if applicable) 1
Source Name Decorative Panels International				
Street Address 416 Ford Ave				
City Alpena	State MI	ZIP Code 49707	County Alpena	
Section/Town/Range (if address not available)				
Source Description Hardboard manufacturing mill				
<input type="checkbox"/> Check here if any of the above information is different than what appears in the existing ROP. Identify any changes on the marked-up copy of your existing ROP.				

OWNER INFORMATION

Owner Name Decorative Panels International	Section Number (if applicable) 1			
Mailing address (x check if same as source address)				
City	State	ZIP Code	County	Country
<input type="checkbox"/> Check here if any information in this ROP renewal application is confidential. Confidential information should be identified on an Additional Information (AI-001) Form.				

SRN: B1476

Section Number (if applicable): 1

PART A: GENERAL INFORMATION (continued)

At least one contact and responsible official must be identified. Additional contacts and responsible officials may be included if necessary.

CONTACT INFORMATION

Contact 1 Name Scott Ickes		Title Senior Manager, Compliance		
Company Name & Mailing address (x check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 989-356-8568		E-mail address Scott.Ickes@decpanels.com		

Contact 2 Name (optional) Tammi Van Til		Title Consultant		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address) Madison Consulting 340 Madison SE				
City Grand Rapids	State MI	ZIP Code 49503	County Kent	Country USA
Phone number 616-454-9647		E-mail address tvantil@comcast.net		

RESPONSIBLE OFFICIAL INFORMATION

Responsible Official 1 Name Duncan Gray		Title Plant Manager		
Company Name & Mailing address (x check if same as source address)				
City	State	ZIP Code	County	Country
Phone number 989-356-8540		E-mail address Duncan.Gray@decpanels.com		

Responsible Official 2 Name (optional)		Title		
Company Name & Mailing address (<input type="checkbox"/> check if same as source address)				
City	State	ZIP Code	County	Country
Phone number		E-mail address		

Check here if an AI-001 Form is attached to provide more information for Part A. Enter AI-001 Form ID:

PART B: APPLICATION SUBMITTAL and CERTIFICATION by Responsible Official

Identify the items that are included as part of your administratively complete application in the checklist below. For your application to be complete, it must include information necessary to evaluate the source and to determine all applicable requirements. Answer the compliance statements as they pertain to all the applicable requirements to which the source is subject. The source's Responsible Official must sign and date this form.

Listing of ROP Application Contents. Check the box for the items included with your application.	
<input checked="" type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> n/a Compliance Plan/Schedule of Compliance
<input checked="" type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input checked="" type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input checked="" type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input checked="" type="checkbox"/> Electronic documents provided (optional)
<input checked="" type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

Compliance Statement

This source is in compliance with **all** of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. X Yes No

This source will continue to be in compliance with all of its applicable requirements, including those contained in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and other applicable requirements not currently contained in the existing ROP. X Yes No

This source will meet in a timely manner applicable requirements that become effective during the permit term. X Yes No

The method(s) used to determine compliance for each applicable requirement is/are the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

If any of the above are checked No, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source is or will be out of compliance at the time of issuance of the ROP renewal on an AI-001 Form. Provide a compliance plan and schedule of compliance on an AI-001 Form.

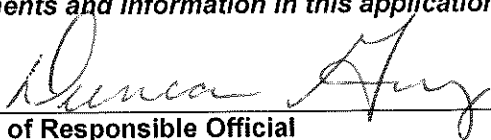
Name and Title of the Responsible Official (Print or Type)

Duncan Gray

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete.

Signature of Responsible Official

Date



16 JUN 20

PART C: SOURCE REQUIREMENT INFORMATION

Answer the questions below for specific requirements or programs to which the source may be subject.

C1. Actual emissions and associated data from all emission units with applicable requirements (including those identified in the existing ROP, Permits to Install and other equipment that have not yet been incorporated into the ROP) are required to be reported in MAERS. Are there any emissions and associated data that have not been reported in MAERS for the most recent emissions reporting year? If Yes , identify the emission unit(s) that was/were not reported in MAERS on an AI-001 Form. Applicable MAERS form(s) for unreported emission units must be included with this application.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C2. Is this source subject to the federal regulations on ozone-depleting substances? (40 CFR Part 82)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C3. Is this source subject to the federal Chemical Accident Prevention Provisions? (Section 112(r) of the Clean Air Act Amendments, 40 CFR Part 68) If Yes , a Risk Management Plan (RMP) and periodic updates must be submitted to the USEPA. Has an updated RMP been submitted to the USEPA?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
C4. Has this stationary source added or modified equipment since the last ROP renewal that changes the potential to emit (PTE) for criteria pollutant (CO, NOx, PM10, PM2.5, SO ₂ , VOC, lead) emissions? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If No , criteria pollutant potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C5. Has this stationary source added or modified equipment since the last ROP renewal that changes the PTE for hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act? If Yes , include potential emission calculations (or the PTI and/or ROP revision application numbers or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions must be included in HAP emission calculations. If No , HAP potential emission calculations do not need to be included.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C6. Are any emission units subject to the Cross-State Air Pollution Rule (CSAPR)? If Yes , identify the specific emission unit(s) subject to CSAPR on an AI-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C7. Are any emission units subject to the federal Acid Rain Program? If Yes , identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form. Is an Acid Rain Permit Renewal Application included with this application?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C8. Are any emission units identified in the existing ROP subject to compliance assurance monitoring (CAM)? If Yes , identify the specific emission unit(s) subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the MDEQ, one must be included with the ROP renewal application on an AI-001 Form. If the CAM Plan has been updated, include an updated copy. Is a CAM plan included with this application? If a CAM Plan is included, check the type of proposed monitoring included in the Plan: 1. Monitoring proposed by the source based on performance of the control device, or 2. Presumptively Acceptable Monitoring, if eligible	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>
C9. Does the source have any plans such as a malfunction abatement plan, fugitive dust plan, operation/maintenance plan, or any other monitoring plan that is referenced in an existing ROP, Permit to Install requirement, or any other applicable requirement? If Yes , then a copy must be submitted as part of the ROP renewal application.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
C10. Are there any specific requirements that the source proposes to be identified in the ROP as non-applicable? If Yes , then a description of the requirement and justification must be submitted as part of the ROP renewal application on an AI-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: AI-	

PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION

Review all emission units at the source and answer the question below.

D1. Does the source have any emission units that do not appear in the existing ROP but are required to be listed in the ROP application under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules? If Yes, identify the emission units in the table below. x Yes No

If No, go to Part E.

Note: Emission units that are subject to process specific emission limitations or standards, even if identified in Rule 212, must be captured in either Part G or H of this application form. Identical emission units may be grouped (e.g. PTI exempt Storage Tanks).

Emission Unit ID	Emission Unit Description	Rule 212(4) Citation [e.g. Rule 212(4)(c)]	Rule 201 Exemption Rule Citation [e.g. Rule 282(2)(b)(i)]
EUOFFICEHEATER	Hot water boiler in office area (natural gas)	R282(2)(b)(i)	R212(4)(c)
EUGASTANK	Gasoline tank, 300 gallons	R284(2)(g)(i)	R212(4)(d)
EULPTANKS	Two 1,000 gallon propane tanks	R284(2)(b)	R212(4)(d)
EUFIREPUMP	Diesel fired pump 550,000 BTU/hr	R285(2)(g)	R212(4)(e)
EUSCALEHEATERS	2 Heaters in scale house 25,000 BTU/hr each (natural gas fired)	R282(2)(b)(i)	R212(4)(c)
EUOFFICEHEATERS	5 n.g. fired office heaters, 5 office AC/heat 150,000 to 300,000 Btu/hr	R282(2)(b)(i)	R212(4)(c)
EUGUARDHOUSE HEATER	Natural gas fired heater in guard house, 25,000 BTU/hr	R282(2)(b)(i)	R212(4)(c)
EUWRHOUSEHEATER	Natural gas fired heater in warehouse, 4,000,000 BTU/hr	R282(2)(b)(i)	R212(4)(c)
EUSILOHEATER	Natural gas fired heater in silo room, 1,200,000 BTU/hr	R282(2)(b)(i)	R212(4)(c)
EUNO1PRESSHEATERS	(2) natural gas fired heaters in No. 1 Press area, 4,000,000 Btu/hr each	R282(2)(b)(i)	R212(4)(c)
EUNO3PRESSHEATERS	(2) natural gas fired heaters in No. 3 Press area, 6,000,000 BTU/hr each	R282(2)(b)(i)	R212(4)(c)
EUNO3PREDRYER HEATER	Natural gas fired room heater, east side of No. 3 Predryer, 25,000 BTU/hr	R282(2)(b)(i)	R212(4)(c)

Comments:

Check here if an AI-001 Form is attached to provide more information for Part D. Enter AI-001 Form ID: AI-

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP and answer the questions below as they pertain to all emission units and all applicable requirements in the existing ROP.

<p>E1. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements as they appear in the existing ROP? If <u>Yes</u>, identify changes and additions on Part F, Part G and/or Part H.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E2. For each emission unit(s) identified in the existing ROP, <u>all</u> stacks with applicable requirements are to be reported in MAERS. Are there any stacks with applicable requirements for emission unit(s) identified in the existing ROP that were <u>not</u> reported in the most recent MAERS reporting year? If <u>Yes</u>, identify the stack(s) that was/were not reported on applicable MAERS form(s).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>E3. Have any emission units identified in the existing ROP been modified or reconstructed that required a PTI? If <u>Yes</u>, complete Part F with the appropriate information.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>E4. Have any emission units identified in the existing ROP been dismantled? If <u>Yes</u>, identify the emission unit(s) and the dismantle date in the comment area below or on an AI-001 Form.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>Comments:</p> <p>E1 – DPI requests that the term 'hardboard dust' be changed to 'hardboard dust or strips' in the conditions under EUBOILER. See ROP markup. This is per our letter to AQD in January, 2020. Since the strip material is identical in composition to the hardboard dust, there are no changes in emissions and it is exempt from permitting under Rule 285(2)(b).</p> <p>E3 – due to a failure of the ESP stack, Boilers 1 & 2 are exhausting through original stack 56. DPI is awaiting the issuance of the PTI to reincorporate that stack for Boiler 1 and 2. The PTI is expected to be issued shortly.</p>	
<p><input type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part E. Enter AI-001 Form ID: AI-</p>	

PART F: PERMIT TO INSTALL (PTI) INFORMATION

Review all emission units and applicable requirements at the source and answer the following questions as they pertain to all emission units with PTIs. Any PTI(s) identified below must be attached to the application.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. Yes x No
If No, go to Part G.

Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed

F2. Do any of the PTIs listed above change, add, or delete terms/conditions to **established emission units** in the existing ROP? If Yes, identify the emission unit(s) or flexible group(s) affected in the comments area below or on an AI-001 Form and identify all changes, additions, and deletions in a mark-up of the existing ROP. Yes No

F3. Do any of the PTIs listed above identify **new emission units** that need to be incorporated into the ROP? If Yes, submit the PTIs as part of the ROP renewal application on an AI-001 Form, and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP. Yes No

F4. Are there any stacks with applicable requirements for emission unit(s) identified in the PTIs listed above that were not reported in MAERS for the most recent emissions reporting year? If Yes, identify the stack(s) that were not reported on the applicable MAERS form(s). Yes No

F5. Are there any proposed administrative changes to any of the emission unit names, descriptions or control devices in the PTIs listed above for any emission units not already incorporated into the ROP? If Yes, describe the changes on an AI-001 Form. Yes No

Comments:

Check here if an AI-001 Form is attached to provide more information for Part F. Enter AI-001 Form ID: **AI-**

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290

Review all emission units and applicable requirements at the source and answer the following questions.

G1. Does the source have any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290. If Yes, identify the emission units in the table below. If No, go to Part H. Yes x No

Note: If several emission units were installed under the same rule above, provide a description of each and an installation/modification/reconstruction date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation		
<input type="checkbox"/> Rule 287(2)(c) surface coating line		
<input type="checkbox"/> Rule 290 process with limited emissions		

Comments:

Check here if an AI-001 Form is attached to provide more information for Part G. Enter AI-001 Form ID: AI-

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Complete this part of the application form for all proposed additions, changes or deletions to the existing ROP. This includes state or federal regulations that the source is subject to and that must be incorporated into the ROP or other proposed changes to the existing ROP. **Do not include additions or changes that have already been identified in Parts F or G of this application form.** If additional space is needed copy and complete an additional Part H.

Complete a separate Part H for each emission unit with proposed additions and/or changes.

H1. Are there changes that need to be incorporated into the ROP that have not been identified in Parts F and G? If <u>Yes</u> , answer the questions below.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H2. Are there any proposed administrative changes to any of the existing emission unit names, descriptions or control devices in the ROP? If <u>Yes</u> , describe the changes in questions H8 – H16 below and in the affected Emission Unit Table(s) in the mark-up of the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H3. Does the source propose to add a new emission unit or flexible group to the ROP not previously identified in Parts F or G? If <u>Yes</u> , identify and describe the emission unit name, process description, control device(s), monitoring device(s) and applicable requirements in questions H8 – H16 below and in a new Emission Unit Table in the mark-up of the ROP. See instructions on how to incorporate a new emission unit/flexible group into the ROP.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H4. Does the source propose to add new state or federal regulations to the existing ROP? If <u>Yes</u> , on an AI-001 Form, identify each emission unit/flexible group that the new regulation applies to and identify <u>each</u> state or federal regulation that should be added. Also, describe the new requirements in questions H8 – H16 below and add the specific requirements to existing emission units/flexible groups in the mark-up of the ROP, create a new Emission Unit/Flexible Group Table, or add an AQD template table for the specific state or federal requirement.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H5. Has a Consent Order/Consent Judgment (CO/CJ) been issued where the requirements were not incorporated into the existing ROP? If <u>Yes</u> , list the CO/CJ number(s) below and add or change the conditions and underlying applicable requirements in the appropriate Emission Unit/Flexible Group Tables in the mark-up of the ROP. EPA-5-16-113(a)-MI-03	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
H6. Does the source propose to add, change and/or delete source-wide requirements? If <u>Yes</u> , identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
H7. Are you proposing to streamline any requirements? If <u>Yes</u> , identify the streamlined and subsumed requirements and the EU ID, and provide a justification for streamlining the applicable requirement below.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

<p>H8. Does the source propose to add, change and/or delete emission limit requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H9. Does the source propose to add, change and/or delete material limit requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H10. Does the source propose to add, change and/or delete process/operational restriction requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H11. Does the source propose to add, change and/or delete design/equipment parameter requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H12. Does the source propose to add, change and/or delete testing/sampling requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H13. Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
<p>H14. Does the source propose to add, change and/or delete reporting requirements? If <u>Yes</u>, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p>	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No

PART H: REQUIREMENTS FOR ADDITION OR CHANGE – (continued)

H15. Does the source propose to add, change and/or delete **stack/vent restrictions**? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H16. Does the source propose to add, change and/or delete any **other** requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

H17. Does the source propose to add terms and conditions for an alternative operating scenario or intra-facility trading of emissions? If Yes, identify the proposed conditions in a mark-up of the corresponding section of the ROP and provide a justification below. Yes No

Check here if an AI-001 Form is attached to provide more information for Part H. Enter AI-001 Form ID: **AI-**



RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION

This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

SRN: B1476	Section Number (if applicable): 1
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1. Additional Information ID AI-Section

Additional Information

2. Is This Information Confidential?	<input type="checkbox"/> Yes x <input checked="" type="checkbox"/> No
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DPI has informed AQD that API no longer exists as a company (Section 2 of the ROP).

The only equipment from Section 2 of the ROP that is still operational is the sludge dryer. DPI has taken over operations of this equipment.

The emission source table and description for the sludge dryer should be moved and the renewed ROP will have 1 section with 1 responsible official. The remaining emission tables and permit conditions from API can be removed from the ROP.

Changes have been indicated on the attached markup.

Question C.10 – Non-applicable requirements – NSPS Dc (40 CFR 60 Subpart Dc) is not applicable to the boilers as listed in the current ROP.

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**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

EFFECTIVE DATE: December 21, 2015

REVISION DATE: April 6, 2016

ISSUED TO:

**Decorative Panels International
and
American Process Incorporated**

State Registration Number (SRN): B1476

LOCATED AT:

416 Ford Avenue, Alpena, Alpena County, Michigan
and
412 Ford Avenue, Alpena, Alpena County, Michigan

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B1476-2015a

Expiration Date: December 21, 2020

Administratively Complete ROP Renewal Application Due Between:
June 21, 2019 and June 21, 2020

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B1476-2015a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Janis Ransom, Cadillac District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

~~Section 4—Decorative Panels International~~

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~~SECTION 4—DECORATIVE PANELS INTERNATIONAL~~

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))
- Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))
- Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R 336.1213(1)(a))
2. It shall not be a defense for the permittee in an 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 ROP. (R 336.1213(1)(b))
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R 336.1213(1)(c))
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R 336.1213(1)(d)):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

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6. and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R 336.1213(1)(e))
7. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R 336.1213(1)(f))
8. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R 336.1213(1)(g))
9. This ROP does not convey any property rights or any exclusive privilege. (R 336.1213(1)(h))

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).² (R 336.1370)
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R 336.1910)

Emission Limits

11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² (R 336.1301(1))
 - a. A 6-minute average of 20 % opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.The grading of visible emissions shall be determined in accordance with Rule 303.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R 336.1901(a))
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R 336.1901(b))

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (R 336.2001)
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R 336.2001(2), R 336.2001(3), R 336.2003(1))
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R 336.2001(5))

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))
- The date, location, time, and method of sampling or measurements.
 - The dates the analyses of the samples were performed.
 - The company or entity that performed the analyses of the samples.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(1)(e), R 336.1213(3)(b)(ii))

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))
19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(i) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))
- For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following (R 336.1213(3)(c)):
- Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. (R 336.1213(3)(c)(i))
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. (R 336.1212(6))
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.² (R 336.1912)

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. (R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))
- The applicable requirements are included and are specifically identified in the ROP.
 - The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. (R 336.1213(6)(b)(i))
 - The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. (R 336.1213(6)(b)(ii))
 - The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. (R 336.1213(6)(b)(iii))

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- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(iii))
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(iii))
 - d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(c), R 336.1217(1)(a))

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(10))
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R 336.1210(8))

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.
37. If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. 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):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c). (40 CFR Part 68)

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R 336.1213(12))

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Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R 336.1201(1))
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R 336.1201(8), Section 5510 of Act 451)
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R 336.1219)
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R 336.1201(4))

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUTRIMMER/PBRUSH-1	Double trimmer and panel brush controlled by Ducon Scrubbers	1956/modified 02/19/1988	NA
EUFIREPUMP	Diesel engine powering emergency fire pump	2000	NA
EUBOILER#1	Boiler fueled by natural gas. Rated at 80,000 pounds of steam per hour.	1956 modified 02/19/1988 09/27/2007 09/27/2015	FGBOILERS1&2
EUBOILER#2	Boiler fueled by natural gas. Rated at 80,000 pounds of steam per hour.	1956 modified 02/19/1988 09/27/2007 09/27/2015	FGBOILERS1&2
EUBOILER#3	Spreader-stoker boiler fueled by natural gas and solid fuels including wood and others identified in this permit. Rated at 60,000 pounds of steam per hour. Controlled by multiclones and an electrostatic precipitator.	1961/modified 02/6/2002 09/27/2007	NA
EUPRESS2S	No. 1 Board press, cooler, and associated equipment controlled by No. 1 Biofilter	1956/modified 12/06/2002	FGPRESSES FGMACTDDDD
EU3PRESS-AREA	No. 3 Board press and cooler controlled by No. 3 Biofilter	1968/modified 08/30/1995	FGPRESSES FGMACTDDDD
EU3 PREDRYER	Board line predryer for Press No. 3, controlled by RCO	1968,modified 03/12/1999	FGPREDRYER- BAKEOVEN, FGMACTDDDD
EU3 BAKEOVEN	Oven for final drying of hard boards, Line 3, controlled by RCO	1968,modified 03/12/99	FGPREDRYER- BAKEOVEN FGMACTDDDD
EUCOLDCLEANER	Any small cold cleaner that is grandfathered out of Rule 201 or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv).	NA	FGCOLDCLEANERS

**EUBOILER#3
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Spreader-stoker boiler fueled by wood chips, natural gas, hardboard dust or strips, waste oil, clarifier oil, and sludge. The boiler is rated at 60,000 pounds of steam per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Multiclones and an electrostatic precipitator

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. HCL	2.2 x 10 ⁻² lb/MMBtu heat input** 2	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.5 SC VI.4 Appendix 5-1	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.1.a
2. Mercury	5.7 x 10 ⁻⁶ lb/MMBtu heat input** 2	At all times except startup and shutdown	EUBOILER#3	SC V.1 SC VI.3 Appendix 5-1	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.1.b
3. Particulate Matter (PM)	3.7 x 10 ⁻² lb/MMBtu heat input** 2	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.3 SC VI.6	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.7.b
4. Particulate Matter (PM)	0.50 pounds per 1000 pounds of exhaust gasses, corrected to 50% excess air ²	Test Protocol*	EUBOILER#3	SC V.3 SC VI.6	R 336.1205, R 336.1331(1)(c)
5. Carbon Monoxide	1500 ppmv, dry, at 3% O ₂ , 3 run average** 2	At all times except during startup and shutdown Test Protocol*	EUBOILER#3	SC V.4	40 CFR 63.7500, 40 CFR Part 63, Subpart DDDDD, Table 2.7.a
6. Visible emissions (opacity)	20 percent ²	Six minute average at all times except for one six-minute average per hour of not more than 27 percent opacity	EUBOILER#3	SC VI.1	R 336.1301
7. Visible emissions (opacity)	10 percent **	Daily block average at all times except during startup and shutdown	EUBOILER#3	SC VI.1	40 CFR Part 63, Subpart DDDDD, Table 4.4

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Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
*Test protocol shall determine averaging time					
**This limit applies on and after January 31, 2016					

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Wastewater Treatment Sludge	2000 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
2. Clarifier Oil	1000 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
3. Misc. Waste Oil	55 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205
4. Hardboard Dust or strips	2500 pounds per hour ²	based on daily average	EUBOILER#3	SC VI.2	R 336.1205

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee may burn only the following fuels in EUBOILER#3, up to the design capacity of the boilers or up to the limits set in Section II of this table, for those materials which have such limits.² (R 336.1205)
 - a. Wood chips
 - b. Bark
 - c. Natural gas
 - d. Wastewater treatment sludge generated on site
 - e. Waste oil generated on site
 - f. Clarifier oil generated on site
 - g. Hardboard dust or strips generated on site
2. The permittee shall not operate EUBOILER#3 unless the electrostatic precipitator (ESP), multiclone and continuous oxygen trim system are installed, maintained, and operated in a satisfactory manner and the exhaust gasses are directed to stack SVBOIL3-STK58.² (R 336.1911, 40 CFR 63.7525(a))
3. The permittee shall only fuel EUBOILER#3 with liquid and solid fuels not considered to be solid waste.² (R 336.1205(3))
4. The permittee may burn the exhaust from the wastewater treatment sludge dryer EUSLUDGEDEHYDRTR in EUBOILER#3.¹ (R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip boiler stack SVBOIL3-STK58 with a continuous opacity monitoring system (COMS). Each COMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and Performance Specification 1 (PS1) of Appendix B, 40 CFR Part 60. (R 336.2150, R 336.1213(3), 40 CFR 75.25(c))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall analyze wastewater treatment sludge for arsenic, barium, cadmium, chromium, total lead, mercury, selenium, and silver. Analysis shall be performed on an annual basis using a standard leachate test method as approved by the AQD. The analysis for total mercury shall use an USEPA test method, an American Society of Testing Materials (ASTM) method, or another test method as approved by the AQD. (R 336.1213(3))

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2. The permittee shall analyze miscellaneous waste oil and clarifier oil for arsenic, cadmium, chromium, lead, flash point, total halogens, PCBs, percent sulfur, and heating value in BTU. Analysis shall be performed on an annual basis using an USEPA test method, an American Society of Testing Materials (ASTM) method, or another test method as approved by the AQD. (R 336.1213(3))
3. The permittee shall verify the PM, CO, HCl, and HG emission rates from EUBOILER#3 in accordance with the procedures and schedules required under the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boilers and Process Heaters. (40 CFR 63.7510, 40 CFR 63.7515, 40 CFR 63.7520, Table 5 of 40 CFR 63 Subpart DDDDD)
4. The permittee shall verify the PM, CO, HCL, and HG emission rates from EUBOILER#3 on an annual basis except as specified in 40 CFR 63.7515(b) through (e), (g), and (h). (40 CFR 63.7515(a))
5. The permittee shall perform an annual audit of the COM using the procedures set forth in US EPA Publication 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", or a procedure acceptable to the AQD.² (R 336.1213(3), 40 CFR 63.7575(c))

See Appendix 5-1

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and continuously record opacity from EUBOILER#3. Six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. The COMS shall be calibrated in accordance with 40 CFR Part 60, Subpart A. This opacity data shall be used for determining compliance with the opacity limit of EUBOILER#3.² (R 336.2150, R 336.1213(3), 40 CFR 63.7575(c))
2. On a monthly basis, the permittee shall record the daily usage rate of each fuel fired and total hours each fuel was fired in EUBOILER#3. The permittee shall record this information in a format acceptable to the AQD.² (R 336.1213(3))
3. On a monthly basis, the permittee shall calculate and record mercury emissions from EUBOILER#3 in pounds per million BTU heat input, based on mercury concentration in wastewater treatment sludge and amount of sludge burned per hour. The permittee shall perform these calculations and record the results in a manner acceptable to the AQD. (R 336.1213(3), 40 CFR 63.7555(d)(1))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c), 40 CFR 63.7545(d))
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test.

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The permittee shall also submit a complete test report to the United States EPA WebFIRE database using CEDRI. (R 336.2001(5), 40 CFR 63.7550(h))

7. In accordance with 40 CFR 60.7(c) and (d), a Continuous Opacity Monitor (COM) Excess Emissions Report (EER) and summary report for all COMs shall be submitted in an acceptable format to the AQD within 30 days following the end of each calendar quarter. This EER shall include each excursion, the magnitude of each exceedance of the specified permit limit, the cause of the excess emissions (if known), any periods of monitor downtime, any corrective action taken, and the total operating time of the source(s). If no exceedances or monitoring system downtime occurred during the reporting period, the permittee shall report that fact. (40 CFR 60.7, R 336.1213(c)(1))
8. The permittee shall report the results of each annual opacity monitor audit required pursuant to Condition V.5 within 60 days after the completion of the audit. (R 336.1213(3), 40 CFR 63.7550(h)(2))
9. The permittee shall report fuel usage rates for each fuel fired and the total hours each fuel was fired in each boiler. The report shall be in a format acceptable to the AQD and shall be submitted to the AQD within 30 days following the end of the quarter in which the information was collected. (R 336.1213(3)(c))
10. If the permittee wishes to revise the test protocol previously approved by the AQD for wastewater treatment sludge, the permittee shall submit the revised test protocol to the AQD not less than 30 days in advance of any applicable required analysis. The permittee shall not use the revised test protocol until it is approved by the AQD. (R 336.1213(3)(a))
11. If the permittee wishes to revise the test protocol previously approved by the AQD for miscellaneous waste oil and clarifier oil, the permittee shall submit the revised test protocol to the AQD not less than 30 days in advance of any applicable required analysis. The permittee shall not use the revised test protocol until it is approved by the AQD. (R 336.1213(3)(a))
12. The permittee shall report the analytical results for wastewater treatment sludge, clarifier oil, and miscellaneous waste oil. The report shall be in a format acceptable to the AQD and shall be submitted to the AQD within 30 days following the date the analysis was completed. The analytical results shall be reported in milligrams per liter (mg/L) or parts per million (ppm). (R 336.1213(3)(c))

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOIL123-STK58	86.4 ²	135 ²	R 336.1225 R 336.1331 R 336.2803 R 336.2804 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a written MAP for EUBOILER#3. This plan shall include information on startup and shutdown of EUBOILER#3 and device operating variables. The plan must be approved by the AQD. Changes to the plan may be made upon written approval of the AQD. (R 336.1911)

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2. If the MAP for EUBOILER#3 does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval.
(R 336.1911)
3. The test results for concentration of arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver in the wastewater treatment sludge must be below the levels found in Appendix 5-1A. (R 336.1224, R 336.1225)
4. The test results for concentration of arsenic, cadmium, chromium, lead, flash point, total halogens, PCBs and sulfur in the miscellaneous waste oil and clarifier oil must be below the levels found in Appendix 5-1B. (R 336.1224, R 336.1225)
5. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boiler and Process Heaters. (40 CFR Part 63, Subpart A, 40 CFR Part 63, Subpart DDDDD, 40 CFR 63.7490)

Footnotes:

¹.This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

².This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUTRIMMER/PBRUSH EMISSION UNIT CONDITIONS
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DESCRIPTION

Double trimmer and panel brush

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Ducon Dual Scrubbers

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
1. Particulate matter	0.10 pounds per 1000 pounds exhaust gasses, dry basis?	Test Protocol*	EUTRIMMER/PBRUSH	SC V.1 SC VI.3	R 336.1331(1)(c)

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUTRIMMER/PBRUSH unless the Ducon scrubbers are installed, maintained, and operated in a satisfactory manner. (R 336.1911)
2. The permittee shall not operate EUTRIMMER/PBRUSH unless the pressure drop across the Ducon scrubbers is within the acceptable range proven adequate by a stack test and indicated in a MAP approved by the AQD for the Ducon scrubbers. (R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip the Ducon scrubbers with a flow rate monitor and an alarm to ensure that water is flowing to the scrubbers. (R 336.1331(1)(c))
2. The permittee shall equip the Ducon scrubbers with a working pressure drop instrument. (R 336.1331(1)(c))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify the PM emission rate from EUTRIMMER/PBRUSH by conducting a stack test once every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall continuously monitor water flow rate to the Ducon scrubbers. An alarm shall indicate when the water flow rate to the Ducon scrubbers falls below the minimum flow level as specified in the MAP for EUTRIMMER/PBRUSH. (R 336.1910, R 336.1213(3))
2. If an alarm sounds, the permittee shall perform those actions specified in the MAP and shall document the actions taken in response to the alarm. (R 336.1213(3))
3. The permittee shall monitor and record, once per calendar day of operation and in a manner and with instrumentation acceptable to AQD, the pressure drop across the Ducon scrubbers. If the pressure drop is outside the acceptable range indicated in the MAP, the permittee shall perform those actions specified in the MAP and shall document the actions taken. (R 336.1910, R 336.1213(3))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVDUCONSCRIB-STK87	60 ²	49.5 ²	R 336.1331(1)(c)
2. SVDUCONSCRIB-STK88	40 ²	51 ²	R 336.1331(1)(c)

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a written MAP for the Ducon scrubbers. The plan shall include the minimum water flow to and the acceptable range for pressure drop across the scrubbers. The plan must be approved by the AQD. Changes to the plan may be made upon written approval by the AQD. (R 336.1911)
2. If the MAP for the Ducon scrubbers does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limitation, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**EUFIREPUMP
 EMISSION UNIT CONDITIONS**

DESCRIPTION

Diesel-fired (compression ignition) reciprocating internal combustion engine rated at less than 500 horsepower, powering a fire pump which is for emergency use only

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee may operate EUFIREPUMP as necessary during emergencies with no time limit. (40 CFR 63.6640(f)(1))
2. The permittee may operate EUFIREPUMP for the following purpose for a maximum of 100 hours per calendar year. (40 CFR 63.6640(f)(2))
 - a. Maintenance checks and readiness testing provided that the tests are recommended by Federal, State, or local government, the engine manufacturer or vendor, or the insurance company associated with EUFIREPUMP. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of EUFIREPUMP beyond 100 hours per calendar year.
3. The permittee may operate EUFIREPUMP for up to 50 hours per engine per year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours of operation allowed under SC III.2. (40 CFR 63.6640(f)(3))
4. The permittee shall operate and maintain EUFIREPUMP according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air-pollution control practice for minimizing emissions. (40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR Part 63, Subpart ZZZZ, Table 6)

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5. The permittee shall comply with the following operational requirements:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first, except as allowed in SC III.6.
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

If EUFIREPUMP is being operated during an emergency and it is not possible to shut down EUFIREPUMP to perform the work practice standards on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice standard can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. (40 CFR 63.6602, 40 CFR Part 63, Subpart ZZZZ, Table 2c, Item 1)

6. The permittee may utilize an oil analysis program in order to extend the specified oil change requirement in SC III.5. The oil analysis program must be performed at the same frequency as oil changes are required. The analysis program must analyze the Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:
 - a. Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
 - b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
 - c. Percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The analysis program must be part of the maintenance plan for EUFIREPUMP. (40 CFR 63.6625(i))

7. The permittee shall minimize EUFIREPUMP's time spent at idle during startup and minimize the EUFIREPUMP's startup time to a period needed for appropriate and safe loading of EUFIREPUMP, not to exceed 30 minutes. (40 CFR 63.6625(h))
8. The permittee must be in compliance with the emission limitations and operating limitations in this subpart that apply to EUFIREPUMP at all times. (40 CFR 63.6605(a))
9. The permittee shall operate and maintain EUFIREPUMP in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain EUFIREPUMP with a non-resettable hour meter. (40 CFR 63.6625(f))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall keep the following records: (40 CFR 63.6655)
 - a. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance status, according to the requirements of 40 CFR 63.10(b)(2)(xiv)
 - b. Records of the occurrence and duration of each malfunction of EUFIREPUMP.
 - c. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning equipment to its normal or usual manner of operation.
 - d. Records to demonstrate continuous compliance with operating limitations in SC III.4.
 - e. Records of the maintenance conducted on EUFIREPUMP in order to demonstrate that EUFIREPUMP is operated and maintained according to the maintenance plan.
 - f. Records of hours of operation recorded through the non-resettable hour meter. The permittee shall document how many hours were spent during emergency operation; including what classified the operation as emergency and how many hours were spent during non-emergency operation.
2. The permittee must keep records of the parameters that are analyzed as part of the oil analysis program in SC III.6, the results of the analysis, and the oil changes for EUFIREPUMP. (40 CFR 63.6625(i))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines as specified in 40 CFR Part 63, Subpart A and Subpart ZZZZ. (40 CFR Part 63, Subparts A and ZZZZ)

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGMACTDDDD	All equipment subject to 40 CFR Part 63, Subpart DDDD: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	EUPRESS2S EU3PRESS-AREA EU3 PREDRYER EU3 BAKEOVEN
FGBOILERS1&2	Boilers 1 and 2, fueled by natural gas.	EUBOILER#1 EUBOILER#2
FGPRESSES	No. 1 and No. 3 presses, coolers, and associated equipment. Controlled by two Biofilters.	EUPRESS2S EU#3PRESS-AREA
FGPREDRYER-BAKEOVEN	Predryer and bake oven for the No. 3 press line. Controlled by regenerative thermal oxidizer.	EU#3PREDRYER EU#3BAKEOVEN
FGCOLDCLEANERS	Any small cold cleaners that are grandfathered out of Rule 201 or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv).	EUCOLDCLEANER

**FGMACTDDDD
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

All equipment on site subject to National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD

Emission Units: EUPRESS2S, EU3PRESS-AREA, EU3PREDRYER, EU3BAKEOVEN

POLLUTION CONTROL EQUIPMENT

Two Biofilters, RCO (on some of the emission units, others uncontrolled)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total HAP as defined in 40 CFR 63.2292	Only ONE of the following for each emission unit:	Test Protocol*	EUPRESS2S EU3PRESS-AREA EU3BAKEOVEN	SC V.1 SC V.3 SC VI.1 SC VI.2	40 CFR 63.2240(b)
	90% reduction, measured as total hydrocarbons				
	20 ppmvd, measured as THC				
	90% reduction in methanol emissions				
	90% reduction in formaldehyde emissions				
	Methanol 1 ppmvd (if methanol entering control device is greater than 10 ppmvd)				
	Formaldehyde 1 ppmvd (if formaldehyde entering control device is greater than 10 ppmvd)				

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- At any time a process controlled by the catalytic oxidizer is operating, the permittee shall maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test according to 40 CFR 63.2262(e). (40 CFR 63.2270, 40 CFR 63.2240)
- At any time a process controlled by either Biofilter is operating, the permittee shall maintain the 24-hour block Biofilter bed temperature within the range established during the performance test according to 40 CFR 63.2262(m). (40 CFR 63.2270, 40 CFR 63.2240)
- The permittee may request a routine control device maintenance exemption for routine maintenance events. Such a request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how the permittee will make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the AQD. Routine control device maintenance exemptions must not exceed 0.5 percent of annual operating uptime for each process unit controlled. (40 CFR 63.2251)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- For EUPRESS2S and EU3PRESS-AREA, the permittee shall use a wood products enclosure as defined in 40 CFR 63.2292. The wood products enclosure for EUPRESS2S and EU3PRESS-AREA shall comply with the following standards: (40 CFR 63.2267, 40 CFR 63.2292)
 - Any natural draft opening shall be at least four equivalent opening diameters from each HAP-emitting point, except for where board enters and exits the enclosure, unless otherwise specified by the AQD.
 - The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
 - The average facial velocity of air through all natural draft openings shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all natural draft openings shall be into the enclosure.
 - All access doors and windows whose areas are not included in item 2 of this definition and are not included in the calculation of facial velocity in item 3 of this definition shall be closed during routine operation of the process.
 - The enclosures shall be designed and maintained to capture all emissions for discharge through a control device.
- The permittee shall equip the RCO combustion chamber and each biofilter bed with temperature sensors. Each sensor shall be located in a position that provides a representative temperature. Each temperature sensor shall have a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger. (40 CFR 63.2269(b)(1) and (2))

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(II))

- The permittee must conduct performance tests on all emission units in FGMACTDDDD for which 40 CFR Part 63, Subpart DDDD requires testing. The permittee must use one of the options specified in 40 CFR Part 63, Subpart DDDD, Table 4 and Table 5. (40 CFR 63.2262, 40 CFR 63.2271(a))
- The permittee shall test the activity level of a representative sample of the RCO catalyst at least once each 12 months. (40 CFR Part 63, Subpart DDDD, Table 2(2), 40 CFR 63.2271(a))

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3. The permittee shall conduct a repeat performance test for EUPRESS2S and EU3PRESS-AREA using the applicable method specified in 40 CFR Part 63, Subpart DDDD, Table 4, within 2 years following the previous performance test and within 180 days after each replacement of any portion of the Biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the Biofilter bed media with the same type of media. (40 CFR Part 63, Subpart DDDD, Table 7, 40 CFR 63.2262)
4. The permittee shall perform an electronic calibration of the temperature sensors in the biofilter beds and RCO catalyst beds at least semiannually, according to the procedures in the manufacturer's Owner's Manual. Following the electronic calibration the permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading. (40 CFR 63.2269(b)(4))
5. The permittee shall conduct calibration and validation checks on any biofilter or RCO temperature sensor any time that sensor exceeds the manufacturer's specified maximum operating temperature range. Alternatively, the permittee may replace that temperature sensor with a new one. (40 CFR 63.2269(b)(5))
6. At least quarterly, the permittee shall inspect temperature sensors in the biofilter and RCO and associated components and electrical connections for continuity, oxidation, and galvanic corrosion. (40 CFR 63.2269(b)(6))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall monitor and record the biofilter media bed temperature on each biofilter. The biofilter media bed temperature shall be calculated as a 24 hour block average as specified in 40 CFR 63.2270, based on evenly spaced temperature readings taken at a minimum rate of one reading per bed per 15-minute period. (R 336.1213(3), 40 CFR 63.2269(a) and (b), 40 CFR 63.2270)
2. The permittee shall monitor and record the temperature of the RCO combustion chamber. At minimum the permittee shall record one temperature reading per 15-minute period. (R 336.1213(3), 40 CFR 63.2269(a) and (b), 40 CFR 63.2270)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. Semiannual compliance report for 40 CFR Part 63, Subpart DDDD, including all information required by 40 CFR 63.2281(c), (d), and (e). To be submitted with the semiannual monitoring and deviation report required by Condition VII.2. (40 CFR 63.2281(a))
5. An immediate startup, shutdown, and malfunction report, if actions taken in response were not consistent with an approved startup, shutdown, and malfunction plan. This report must be submitted by fax or telephone within two working days after starting actions inconsistent with the plan. Following this, the permittee shall provide all information required in 40 CFR 63.10(d)(5)(ii), in writing, within seven calendar days. (40 CFR 63.2281(a), 40 CFR Part 63, Subpart DDDD, Table 9(2))

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6. The permittee shall notify the AQD Technical Programs Unit Supervisor and District Supervisor no less than 60 calendar days before any performance test is scheduled to begin. (40 CFR 63.2280(c), 40 CFR 63.7(b)(1), R 336.2001(4))
7. The permittee shall submit two copies of a Notification of Compliance Status, including the performance test results, one to the AQD Technical Programs Unit Supervisor and one to the AQD District Supervisor, within 60 calendar days following the completion of any performance test, as specified in 40 CFR 63.10(d)(2). (40 CFR 63.2280(d)(2), 40 CFR 63.10(d)(2), R 336.2001(5))

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall develop a written Startup, Shutdown, and Malfunction Plan, according to the provisions of 40 CFR 63.6(e)(3). (40 CFR 63.2250(c))
2. Following testing of the catalyst of the Regenerative Catalytic Oxidizer, as specified in Condition V.2, the permittee shall take any necessary corrective action to ensure that the catalyst is performing within its design range. (40 CFR Part 63, Subpart DDDD, Table 7(4))
3. For each temperature monitoring device, such as the temperature sensors in the RCO and biofilter, the sensors must meet the following requirements: (40 CFR 63.2269(b)(1, 2, and 3))
 - a. Each sensor must be located in a position which provides a representative temperature.
 - b. Each sensor must have a minimum accuracy of 4°F or 0.75% of the temperature value, whichever is larger.
 - c. If a chart recorder is used, it must have sensitivity with minor divisions of not more than 20°F.
4. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDD: National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products by the initial compliance date. (40 CFR Part 63, Subparts A and DDDD)

Footnotes:

1. This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
2. This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGBOILERS1&2
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Two boilers fueled by natural gas. Each boiler is rated at 80,000 pounds per hour of steam production.

Emission Unit: EUBOILER#1, EUBOILER#2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NOx	0.10 lb/MMBtu	Test Protocol*	EUBOILER#1, EUBOILER#2	SC V.1	40 CFR 60.44b(a)
2. NOx	11.53 lb/hour	Test Protocol*	EUBOILER#1, EUBOILER#2	SC V.1	R 336.1205

*Test protocol shall determine averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall only combust natural gas in FGBOILERS1&2.2 (R 336.1205(3))
- The permittee may burn the exhaust from the sludge dryer EUSLUDGEDEHYDRTR in either EUBOILER#1 OR EUBOILER#2.1 (R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall verify the NOx emission rates from EUBOILER#1 and from EUBOILER#2 every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A.2 (R 336.1213(3), R 336.2001)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c)) The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
5. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))
6. Unless the conversion is completed and notification submitted before issuance of this Renewable Operating Permit, the permittee shall provide written notification when conversion of EUBOILER#1 and EUBOILER#2 to natural gas firing only has been completed. Notification shall be provided no more than 14 days after the boilers have become operational on natural gas and shall provide notice that the boilers are operational only on natural gas. (R 336.1213(3))

See Appendix 8-1

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOIL123-STK58	86.4 ²	135 ²	R 336.1331
2. SVBOIL-1&2-STACK56	96.75	135	R336.1201

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IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A and Subpart DDDDD for Major Sources: Industrial Boiler and Process Heaters. (40 CFR Part 63, Subpart A, 40 CFR Part 63, Subpart DDDDD, 40 CFR 63.7490)

Footnotes:

1.This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

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².This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGPRESSES
 FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Presses 1, 3, and their associated board coolers

Emission Units: EUPRESS2S, EUPRESS3-AREA

POLLUTION CONTROL EQUIPMENT

#1 Biofilter and #3 Biofilter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Particulate Matter	0.10 pounds per 1000 pounds exhaust gasses on a dry gas basis ²	Test Protocol*	FGPRESSES	SC V.1	R 336.1331
Particulate Matter	29.3 pounds per hour ²	Test Protocol*	EUPRESS2S	SC VI.2 SC VI.3 SC VI.4	R 336.1331

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate EUPRESS2S and/or EU3PRESS-AREA unless the Biofilter controlling each emission unit that is operating is installed, maintained, and operated in a satisfactory manner. (R 336.1901)
2. The permittee shall not operate EUPRESS2S and/or EU3PRESS-AREA except as specified in a MAP, approved by the AQD, setting forth operational parameters including acceptable ranges of bed temperature, differential pressure, and water flow for the No. 1 and No. 3 Biofilters. (R 336.1911)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall install and maintain a system to continuously monitor the water flow, in gallons per minute, through the spray tower on the Humidification System on the No. 3 Biofilter. (R 336.1213(3), R 336.1911)
2. The permittee shall install and maintain a line pressure gauge to determine the water pressure on the Humidification System on the No. 1 Biofilter. (R 336.1213(3), R 336.1911)

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3. The permittee shall install a system to continuously monitor the pressure drop across the Biofilter media beds for both No. 1 and No. 3 Biofilters. (R 336.1213(3), R 336.1911, 40 CFR 63.2240)
4. The permittee shall install a system to continuously monitor the temperature of the Biofilter media beds for both No. 1 and No. 3 Biofilters. (R 336.1213(3), R 336.1911)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify the PM emission rate from FGPRESSES by conducting a stack test every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001, R 336.1910)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall record the pressure drop across the Biofilter media beds for both No. 1 and No.3 Biofilters at startup. Startup is as defined in the MAP for No. 1 and No. 3 Biofilters. (R 336.1213(3))
2. The permittee shall record the pressure drop across the Biofilter media beds for both No. 1 and No.3 Biofilters at least once per shift. (R 336.1213(3))
3. The permittee shall monitor and record water flow through the spray tower on the humidification system of the No. 3 Biofilter and water pressure on the humidification system of the No. 1 Biofilter. All items specified in the MAP for the No. 1 and No. 3 Biofilters shall be recorded once per shift while operating. (R 336.1213(3))
4. The permittee shall record the 24 hour block average temperature of the Biofilter media beds for both the No. 1 and No. 3 Biofilters. (R 336.1213(3), 40 CFR 63.2270(e))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVS2SCOOLR-STK28	64 ¹	100 ¹	R 336.1901
2. SV#3PRESS-STK68	48 ¹	103 ¹	R 336.1901

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a written MAP for No. 1 and No. 3 Biofilters. The plan shall include, for each of the Biofilters individually:
 - a. The minimum gallons per minute of water recirculation through the spray tower system on the humidification system of the Biofilter;
 - b. The minimum pressure drop across the Biofilter media beds at startup;
 - c. The minimum pressure drop across the Biofilter media beds under normal operating conditions;

The plan must be submitted to and approved by the AQD in advance. Changes to the plan may be made upon written approval by the AQD. (R 336.1911)

2. ~~2~~—If the MAP for the No. 1 and No. 3 Biofilters does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)
3. ~~The permittee shall comply with all requirements of the compliance program and general provisions contained in the administrative consent order established by US EPA Region V dated 6/14/2017.~~

ADD REFERENCE TO COMPLIANCE WITH CONSENT ORDER

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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FGPREDRYER-BAKEOVEN FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Predryer and Bake Oven for No. 3 press line

Emission Unit: EU3PREDRYER, EU3BAKEOVEN

POLLUTION CONTROL EQUIPMENT

Regenerative Catalytic Oxidizer (RCO)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate matter	0.10 pounds per 1000 pounds of exhaust gasses on a dry gas basis	Test Protocol*	FGPREDRYER-BAKEOVEN	SC V.1	R 336.1331

*Test protocol shall specify averaging time

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The permittee shall not operate FGPREDRYER-BAKEOVEN unless the RCO is installed, maintained, and operated in a satisfactory manner. (R 336.1911, 40 CFR 63.2240(b))
- The permittee shall operate FGPREDRYER-BAKEOVEN in compliance with the MAP for EU3PREDRYER, EU3BAKEOVEN, and the RCO. (R 336.1911)
- When in operation, the RCO shall operate at a temperature such that the 3 hour block average catalytic oxidizer temperature is above the minimum temperature established during an approved performance test. (R 336.1901, R 336.1911, 40 CFR 63.2240(b), Table 2 to Subpart DDDD of 40 CFR Part 63)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall equip the combustion chamber of the Regenerative Catalytic Oxidizer with a working temperature gauge. (R 336.1901)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall verify the PM emission rate from FGPREDRYER-BAKEOVEN by conducting a stack test every five years. All testing, sampling, analytical and calibration procedures performed under this condition shall be performed in accordance with applicable Federal Reference Methods, 40 CFR Part 60, Appendix A. (R 336.1213(3), R 336.2001)

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. Permittee shall continuously monitor the RCO temperature and shall record the 3 hour block average catalytic oxidizer temperature. (R 336.1901, 40 CFR 63.2240(b))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))
4. The permittee shall submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing. (R 336.12001(3))
5. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor no less than 7 days prior to the anticipated test date. (R 336.2001(4))
6. The permittee shall submit two complete test reports of the test results to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, within 60 days following the last date of the test. (R 336.2001(5))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall implement and maintain a written MAP for FGPREDRYER-BAKEOVEN and the RCO. This plan shall include the temperature range, established during stack testing, that is acceptable for the RCO when it is in operation. The plan must be approved by the AQD. Changes to the plan may be made with written approval by the AQD. (R 336.1901, R 336.1911, 40 CFR 63.2440(b))

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2. If the MAP for FGPREDRYER-BAKEOVEN and the RCO does not adequately prevent, detect, and correct malfunctions or equipment failures that result in emissions exceeding any applicable emission limit, the permittee shall prepare a revised MAP which addresses these deficiencies and shall submit the revised MAP to the AQD for approval. (R 336.1911)

Footnotes:

- 1.This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
- 2.This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGCOLDCLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EUCOLDCLEANER

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (R 336.1213(2))

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (R 336.1611(2)(b), R 336.1707(3)(b))
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (R 336.1213(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (R 336.1281(h))
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (R 336.1285(r)(iv))
2. The cold cleaner shall be equipped with a device for draining cleaned parts. (R 336.1611(2)(b), R 336.1707(3)(b))
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (R 336.1611(2)(a), R 336.1707(3)(a))

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4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (R 336.1707(2)(a))
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (R 336.1707(2)(b))
 - c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. (R 336.1707(2)(c))

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. (R 336.1213(3))
2. The permittee shall maintain the following information on file for each cold cleaner: (R 336.1213(3))
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. (R 336.1611(3), R 336.1707(4))
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. (R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

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VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUBOILER#3	40 CFR Part 60, Subpart Dc	40 CFR Part 60, Subpart Dc only applies to small industrial boilers for which construction began on or after June 9, 1989. EUBOILER#3 was installed before this date, in 1961.
FGBOILERS1&2	40 CFR Part 60, Subpart Dc	40 CFR Part 60, Subpart Dc only applies to small industrial boilers for which construction began on or after June 9, 1989. The boilers in FGBOILERS1&2 were installed before this date, in 1959.

APPENDICES**Appendix 1.1 Acronyms and Abbreviations**

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure*	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNGR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

Appendix 2-1. Schedule of Compliance

The permittee certified in this ROP application that this stationary source is in compliance with all applicable requirements of this ROP except for the following: The provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63, Subpart DDDD, including 40 CFR 63.2230 through 40 CFR 2292 and the appendices thereto. As a result, the permittee was required to submit a Schedule of Compliance as defined in Rule 119(a), pursuant to Rule 210(2) and Rule 213(4).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of the ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

Compliance Plan & Schedule of Compliance

~~At the time of the issuance of this permit, the company is in negotiations with the United States Environmental Protection Agency to establish a compliance plan and schedule of compliance as part of a Consent Order. Once the Consent Order is entered into, within 90 days the permittee shall apply to the AQD for a modification to this ROP to incorporate the Compliance Plan and Schedule of Compliance information from the Consent Order into the ROP.~~ ADD EPA CONSENT ORDER TO THIS ROP

Appendix 3-1. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4-1. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5-1. Testing Procedures

The permittee shall use the following approved test plans, procedures, and averaging to measure the pollutant emissions for the applicable requirements referenced in EUBOILER#3.

Wastewater Sludge

The following table lists the maximum allowed concentrations of the listed contaminants for wastewater treatment sludge to be burned in EUBOILER#3.

Appendix 5-1A	
Parameter	Extract Concentration Milligrams Per Liter
Arsenic	5.0
Barium	100.0
Cadmium	1.0
Chromium	5.0
Lead	5.0
Mercury	0.2
Selenium	1.0
Silver	5.0

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Miscellaneous waste oil and clarifier oil:

The following table lists maximum allowed concentrations of the listed contaminants and the minimum flash point for miscellaneous waste oil and clarifier oil to be burned in EUBOILER#3.

Appendix 5-1B	
Parameter	Allowed Levels
Arsenic	Less than 5 parts per million
Cadmium	Less than 2 parts per million
Chromium	Less than 10 parts per million
Lead	Less than 100 parts per million
Flash point	Greater than 100 degrees Fahrenheit
Total halogens	Less than 4,000 parts per million
PCBs	Less than 2 parts per million
Sulfur	Less than 1 percent at 18,000 BTU/lb

Appendix 6-1. Permits to Install

The following table lists any PTIs issued or ROP revision applications received since the effective date of the previously issued ROP No. MI-ROP-B1476-2009. Those ROP revision applications that are being issued concurrently with this ROP renewal are identified by an asterisk (*). Those revision applications not listed with an asterisk were processed prior to this renewal.

Source-Wide PTI No MI-PTI-B1476-2009 is being reissued as Source-Wide PTI No. MI-PTI-B1476-2015

Permit to Install Number	ROP Revision Application Number	Description of Equipment or Change	Corresponding Emission Unit(s) or Flexible Group(s)
NA	201000042	Changes to CAM requirements	FGBOILER123
NA	201200009 July 1, 2013	Removal of Stacks SVBOIL3-STK57 and SVBOIL-1&2-STK56.	FGBOILER123
4-15	201500134	Conversion of EUBOILER#1 and EUBOILER#2 to natural gas firing only	FGBOILER123, FGBOILER12, EUBOILER#3
4-15A	201500185*	Minor modification- revision of the exhaust stack dimensions specified in 4-15	FGBOILER123, FGBOILER12, EUBOILER#3

The following ROP amendments or modifications were issued after the effective date of ROP No. MI-ROP-B1476-2015.

Permit to Install Number	ROP Revision Application Number/Issuance Date	Description of Change	Corresponding Emission Unit(s) or Flexible Group(s)
208-15	201600008/April 6, 2016	Incorporate PTI No. 208-15 into Section 1 of the ROP. PTI No. 208-15 is to remove a unit-specific visible emission limitation for the presses.	FGPRESSES
54-20	June 2, 2020	Incorporate stack SVBOIL-1&2-ST56 into ROP for temporary use	FGBOILERS1&2

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Appendix 7-1. Emission Calculations

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8-1. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP 5736) and MDEQ, AQD, Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

ADD EPA CONSENT ORDER TO APPENDIX

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~~SECTION 2 – AMERICAN PROCESS INCORPORATED~~

A. GENERAL CONDITIONS

Permit Enforceability

- ~~All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R-336.1213(5))~~
- ~~Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R-336.1213(5)(a), R-336.1214a(5))~~
- ~~Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R-336.1213(5)(b), R-336.1214a(3))~~

General Provisions

1. ~~The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA. (R-336.1213(1)(a))~~
2. ~~It shall not be a defense for the permittee in an 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 ROP. (R-336.1213(1)(b))~~
3. ~~This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (R-336.1213(1)(c))~~
4. ~~The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (R-336.1213(1)(d)):~~
 - a. ~~Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.~~
 - b. ~~Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.~~
 - c. ~~Inspect, at reasonable times, any of the following:~~
 - i. ~~Any stationary source.~~
 - ii. ~~Any emission unit.~~
 - iii. ~~Any equipment, including monitoring and air pollution control equipment.~~
 - iv. ~~Any work practices or operations regulated or required under the ROP.~~
 - d. ~~As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.~~
5. ~~The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.234 et seq.,~~

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~~and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. (R-336.1213(1)(e))~~

- ~~6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. (R-336.1213(1)(f))~~
- ~~7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. (R-336.1213(1)(g))~~
- ~~8. This ROP does not convey any property rights or any exclusive privilege. (R-336.1213(1)(h))~~

Equipment & Design

- ~~9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority-I and II areas requires the use of material handling methods specified in Rule 370(2).² (R-336.1370)~~
- ~~10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. (R-336.1910)~~

Emission Limits

- ~~11. Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, "Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following:"² (R-336.1301(1))~~
 - ~~a. A 6-minute average of 20% opacity, except for one 6-minute average per hour of not more than 27 percent opacity.~~
 - ~~b. A limit specified by an applicable federal new source performance standard.~~

~~The grading of visible emissions shall be determined in accordance with Rule 303.~~
- ~~12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:~~
 - ~~a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ (R-336.1901(a))~~
 - ~~b. Unreasonable interference with the comfortable enjoyment of life and property.¹ (R-336.1901(b))~~

Testing/Sampling

- ~~13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).² (R-336.2001)~~
- ~~14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. (R-336.2001(2), R-336.2001(3), R-336.2003(1))~~
- ~~15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. (R-336.2001(5))~~

Monitoring/Recordkeeping

- ~~16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate. (R 336.1213(3)(b))~~
- ~~a. The date, location, time, and method of sampling or measurements.~~
 - ~~b. The dates the analyses of the samples were performed.~~
 - ~~c. The company or entity that performed the analyses of the samples.~~
 - ~~d. The analytical techniques or methods used.~~
 - ~~e. The results of the analyses.~~
 - ~~f. The related process operating conditions or parameters that existed at the time of sampling or measurement.~~
- ~~17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (R 336.1213(4)(e), R 336.1213(3)(b)(ii))~~

Certification & Reporting

- ~~18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R 336.1213(3)(c))~~
- ~~19. A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (R 336.1213(4)(c))~~
- ~~20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (R 336.1213(4)(c))~~
- ~~21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (R 336.1213(3)(c))~~
- ~~a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).~~
 - ~~b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.~~
 - ~~c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.~~

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22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following ~~{R 336.1213(3)(e)}~~:
- ~~Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.~~
 - ~~Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.~~
23. ~~Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. {R 336.1213(3)(e)(i)}~~
24. ~~On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. {R 336.1212(6)}~~
25. ~~The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA. {R 336.1912}~~

Permit Shield

26. ~~Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. {R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii)}~~
- ~~The applicable requirements are included and are specifically identified in the ROP.~~
 - ~~The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.~~
- ~~Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.~~
27. ~~Nothing in this ROP shall alter or affect any of the following:~~
- ~~The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. {R 336.1213(6)(b)(i)}~~
 - ~~The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. {R 336.1213(6)(b)(ii)}~~
 - ~~The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. {R 336.1213(6)(b)(iii)}~~

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- ~~d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. (R 336.1213(6)(b)(iv))~~
- ~~28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:~~
- ~~a. Operational flexibility changes made pursuant to Rule 215. (R 336.1215(5))~~
 - ~~b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). (R 336.1216(1)(b)(III))~~
 - ~~c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. (R 336.1216(1)(c)(III))~~
 - ~~d. Minor Permit Modifications made pursuant to Rule 216(2). (R 336.1216(2)(f))~~
 - ~~e. State Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. (R 336.1216(4)(e))~~
- ~~29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. (R 336.1217(1)(e), R 336.1217(1)(a))~~

Revisions

- ~~30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. (R 336.1215, R 336.1216)~~
- ~~31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). (R 336.1219(2))~~
- ~~32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. (R 336.1210(10))~~
- ~~33. Pursuant to Rule 216(1)(b)(III), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. (R 336.1216(1)(c)(III), R 336.1216(2)(d), R 336.1216(4)(d))~~

Reopenings

- ~~34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:~~
- ~~a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. (R 336.1217(2)(a)(i))~~
 - ~~b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. (R 336.1217(2)(a)(ii))~~
 - ~~c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits of the terms or conditions of the ROP. (R 336.1217(2)(a)(iii))~~
 - ~~d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. (R 336.1217(2)(a)(iv))~~

Renewals

35. ~~For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. (R-336.1210(8))~~

Stratospheric Ozone Protection

36. ~~If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.~~
37. ~~If the permittee is subject to 40 CFR Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.~~

Risk Management Plan

38. ~~If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).~~
39. ~~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 40 CFR 68.130, or~~
 - ~~c. The date on which a regulated substance is first present above a threshold quantity in a process.~~
40. ~~If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.~~
41. ~~If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(e). (40 CFR Part 68)~~

Emission Trading

42. ~~Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. (R-336.1213(12))~~

Permit To Install (PTI)

- ~~43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (R-336.1201(1))~~
- ~~44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (R-336.1201(8), Section 5510 of Act 451)~~
- ~~45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (R-336.1219)~~
- ~~46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48900, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (R-336.1201(4))~~

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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~~B. SOURCE-WIDE CONDITIONS~~

~~Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.~~

~~The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.~~

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EULIME	Lime storage and handling with passive vent filter	04/25/2012	FGARIFACILITY
EUPRETREAT	Feedstock pretreatment: Three Vapor Compression-Evaporation (VCE) units, reverse osmosis separator, and associated equipment, one stack, uncontrolled	04/25/2012	FGARIFACILITY FGNSPSVvA
EUYEASTPROP	Yeast propagation system: One 24,300 gallon yeast recycle tank, controlled by facility wet scrubber	04/26/2012	FGETHANOL FGARIFACILITY FGNSPSVvA
EUETHANOLFERM	Ethanol fermentation process: Four 62,500 gallon fermenters and one 72,000 gallon beer well, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGARIFACILITY FGNSPSVvA FGMON
EUBEERCOLUMN	Beer column to separate ethanol from yeast and residual sugars, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGARIFACILITY FGNSPSVvA FGMON
EURECTIFIER	Rectifier column to separate ethanol from water, controlled by facility wet scrubber	04/25/2012	FGETHANOL FGARIFACILITY FGNSPSVvA FGMON
EUMOLSIEVE	Two vapor phase molecular sieves to produce 200 proof ethanol. Emissions are controlled by the wet scrubber.	04/26/2012	FGETHANOL FGARIFACILITY FGNSPSVvA FGMON
EUTANK1	5,880 gallon ethanol shift tank, uncontrolled.	04/25/2012	FGARIFACILITY
EUTANK3	5,880 gallon secondary ethanol shift tank, uncontrolled	04/25/2012	FGARIFACILITY
EUTANK4	17,400 gallon ethanol product tank, uncontrolled	04/25/2012	FGARIFACILITY
EUETHLOAD	Denatured ethanol truck load-out, uncontrolled	04/25/2012	FGARIFACILITY FGMON

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Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUSLUDGEDEHYDRTR	Paddle dryer, dries waste water treatment sludge. Controlled by a venturi scrubber, condenser, and one of the following boilers: EUBOILER#1, EUBOILER#2, and EUBOILER#3. All three boilers are located at, and operated by, Decorative Panels International (DPI).	07/27/2000 Modified 03/12/2001 11/08/2007	NA

Commented [TVT1]: Move sludge dryer description and table with permit conditions into a single section for DPI

EULIME
EMISSION UNIT CONDITIONS

DESCRIPTION

Lime storage and handling. Lime is delivered by truck and transferred to a storage silo using the truck-mounted blower. The silo is equipped with a passive vent filter to control emissions.

Flexible Group ID: FGAPIFACILITY

POLLUTION CONTROL EQUIPMENT

Passive vent filter on silo

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Visible Emissions	20% opacity	6 minute average	Lime silo	SC-V.4	R-336.4304

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not transfer lime into the lime storage silo unless the lime storage silo vent filter is installed, maintained, and operated in a satisfactory manner. (R-336.1205(1), R-336.1304, R-336.1334, R-336.1901, R-336.1910)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R-336.1213(3)(b)(ii))

1. The permittee shall perform and record the results of a 6 minute non-certified visible emission check on the lime silo vent at least once during each filling operation. The visible emission check shall simply verify the presence or absence of visible emissions and need not follow the procedures specified in USEPA Reference Test Method 9. If visible emissions are observed, the permittee shall immediately take corrective actions as specified in the facility Malfunction Abatement Plan. (R-336.1910, R-336.1213(3))

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R-336.1213(3)(b)(ii))

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1. The permittee shall keep, in a satisfactory manner, records of the amount of lime transferred to the lime storage silo. The permittee shall keep all records on file and make them available to the AQD upon request.² (R-336.1205(1), R-336.1904, R-336.1910, R-336.1213(3))
2. The permittee shall keep results of the visible emissions checks and records of any corrective actions taken in response to excess emissions. The permittee shall keep this information on file and make them available to the AQD upon request. (R-336.1213(3))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R-336.1213(3)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R-336.1213(3)(i))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R-336.1213(4)(e))

See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

- ¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
- ²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUETHLOAD EMISSION UNIT CONDITIONS

DESCRIPTION

Denatured ethanol truck load-out. Gasoline, the denaturant, is added to the 200-proof ethanol using an inline pump immediately before loading into the trucks.

Flexible Group ID: FGAPIFACILITY

POLLUTION CONTROL EQUIPMENT

Submerged fill pipes on trucks loaded

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total ethanol and denaturant throughput	1.17 million gallons per year. ²	12-month rolling time period as determined at the end of each calendar month	EUETHLOAD	SC-VI.4	R-336.4206(4) R-336.4225 R-336.4702(a) R-336.4804 R-336.2803 R-336.2804 40 CFR 52.24 (c) & (d)
2. Denaturant throughput	45,000 gallons per year. ²	12-month rolling time period as determined at the end of each calendar month	EUETHLOAD	SC-VI.4	R-336.4206(4) R-336.4225 R-336.4702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not load any tanker trucks with ethanol, gasoline, or a blend of the two at the API facility unless each tanker truck is equipped with submerged fill piping.² (R-336.4205(4), R-336.4225, R-336.4702(a))

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R-336.4213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall record, in a satisfactory manner, the denaturant, ethanol, and combined ethanol and denaturant throughput for EULETHLOAD for each month and 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep these records on file and make them available to the Department upon request. (R 336.1205(1), R 336.1225, R 336.1702(a))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(ii))
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

EUSLUDGEDEHYDRTR EMISSION UNIT CONDITIONS
--

DESCRIPTION

Paddle Dryer for drying wastewater treatment sludge

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Venturi Scrubber, Condenser, EUBOILER#1 and EUBOILER#2. (Both boilers are located in and operated by Decorative Panels International (DPI) and are covered in Section 1 of this Renewable Operating Permit.)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Particulate matter	0.10 pounds per 1000 pounds of exhaust gasses, calculated on a dry basis ²	NA	EUSLUDGEDEHYDRTR when controlled only by Venturi Scrubber and Condenser	SC VI.1 SC VI.2	R 336.1331(1)(c)
Particulate matter	0.82 pounds per hour ²	NA	EUSLUDGEDEHYDRTR	SC VI.1 SC VI.2	R 336.1331(1)(c)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

- The minimum water feed rate to the venturi scrubber shall be 40 gallons per minute.² (R 336.1910)
- The minimum water feed to the condenser shall be that for which compliance with acceptable odor thresholds was demonstrated. The minimum water feed to the condenser shall be specified in the MAP for EUSLUDGEDEHYDRTR.¹ (R 336.1901)
- The permittee shall not operate EUSLUDGEDEHYDRTR unless the condenser and venturi scrubber are installed, maintained and operated in a satisfactory manner, except as otherwise allowed by the MAP for EUSLUDGEDEHYDRTR.² (R 336.1911)
- The permittee shall use only steam as the heat transfer medium in EUSLUDGEDEHYDRTR.¹ (R 336.1901)

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- Exhaust gasses from EUSLUDGEDEHYDRTR shall be burned in EUBOILER#1, EUBOILER#2, or EUBOILER#3, except as otherwise allowed by the MAP for EUSLUDGEDEHYDRTR.¹ (R 336.1901)

IV. DESIGN/EQUIPMENT PARAMETER(S)

- The permittee shall maintain a pressure relief valve at the inlet of EUSLUDGEDEHYDRTR. The pressure relief valve shall be set to prevent steam pressure from exceeding 200 PSIG.¹ (R 336.1901)

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

- The permittee shall monitor and record the water flow through the venturi scrubber in gallons per minute, on a continuous basis, in a manner and with instrumentation acceptable to the AQD.² (R 336.1213(3), R 336.1910)
- The permittee shall monitor and record the water flow through the condenser in gallons per minute, on a continuous basis, in a manner and with instrumentation acceptable to the AQD.² (R 336.1213(3), R 336.1910)

VII. REPORTING

- Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))
- Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
- Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))

See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
SVBOIL123-STK58	86.4 ¹	135 ¹	R 336.1901
SVSTK95	8.4 ¹	69 ¹	R 336.1901
SVBOIL-1&2-STK56	96.75	135	R336.1901

IX. OTHER REQUIREMENT(S)

- The minimum water feed rates to the condenser and to the venturi scrubber shall be maintained electronically in the facility computer system or posted near the facility operator station(s).² (R 336.1910)

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2. The permittee shall implement and maintain a written MAP for EUSLUDGEDEHYDRTR. The plan shall be subject to approval by the AQD. Changes to the plan may be made upon written approval by the AQD.² (R 336.1911)
3. If the MAP for EUSLUDGEDEHYDRTR does not adequately prevent, detect, and correct malfunctions or equipment failures resulting in emissions exceeding any applicable emission limitation, then the permittee shall revise the MAP to address the inadequacies and shall submit the revised MAP to the AQD for approval.² (R 336.1911)
4. Compliance of EUSLUDGEDEHYDRTR exhaust during EUBOILER#1, EUBOILER#2, and/or EUBOILER#3 upset conditions shall be determined as described in the MAP, with exhaust from EUSLUDGEDEHYDRTR vented through SVSTK95.¹ (R 336.1901)

Footnotes:

¹.This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

².This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

D. FLEXIBLE GROUP CONDITIONS

Part D outlines the terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGETHANOL	Ethanol fermentation and purification equipment vented to the process wet scrubber.	EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE
FGNSPSVVa	All pumps, valves, and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each sampling connection; and each open ended valve or line and all associated closed vent systems and control devices.	All equipment subject to 40 CFR Part 60, Subpart VVa including: EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE
FGMON	Miscellaneous organic chemical manufacturing process units (MCRU) that are located at, or are part of, a major source as defined in section 112(a) of the Clean Air Act and that meet all the criteria specified in 40 CFR Part 63, Subpart FFFF (40 CFR), 63-2435. Specified processes are further defined in 40 CFR 63.2440.	All equipment subject to 40 CFR Part 63, Subpart FFFF including: EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE EUETHLOAD
FGAIFACILITY	All process equipment source-wide at the American Process Incorporated facility including equipment covered by other permits, grand-fathered equipment and exempt equipment. Does not include EUSLUDGEDEHYDRTR which is located in the adjacent Decorative Panels International facility, but which is operated by American Process International as part of the wastewater treatment system.	EUPRETREAT EUYEASTPROP EUETHANOLFERM EUBEERCOLUMN EURECTIFIER EUMOLSIEVE, EULIME EUTANK1 EUTANK3 EUTANK4 EUETHLOAD

FGETHANOL
FLEXIBLE GROUP CONDITIONS

DESCRIPTION:

Ethanol fermentation and purification equipment vented to the process wet scrubber.

Emission Units: EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE

POLLUTION CONTROL EQUIPMENT

Wet scrubber CE002

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	0.6 lb per hour ²	NA	FGETHANOL	SC-V.4 SC-VI.3 SC-VI.4	R-336.1702(a) R-336.1904 R-336.1205(1)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. ~~The permittee shall not operate any equipment in FGETHANOL unless the wet scrubber is installed, maintained, and operated in a satisfactory manner. Satisfactory operation includes maintaining the scrubber liquid flow rate in the range identified in the MAP as constituting satisfactory operation.² (R-336.1225, R-336.1702(a), R-336.1904, R-336.1910, R-336.1205(1))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. ~~The permittee shall equip and maintain FGETHANOL with a wet scrubber. (R-336.1702(a), R-336.1904)~~
2. ~~The permittee shall equip and maintain the wet scrubber with a liquid flow rate indicator capable of accurately indicating the scrubber liquid flow rate over the entire range of flow rates that constitutes satisfactory operation, as described in the MAP.² (R-336.1225, R-336.1702(a), R-336.1904, R-336.1910, R-336.1205(1))~~

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R-336.1243(3)(b)(iii))

1. ~~The permittee may be required to verify and quantify emission rates of VOC from the wet scrubber exhaust of FGETHANOL by testing, at the owner's expense, in accordance with AQD requirements. (R-336.1243(3))~~

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VI. MONITORING/RECORDKEEPING

~~Records shall be maintained on file for a period of five years. (R 336.4213(3)(b)(iii))~~

- ~~1. The permittee shall monitor, in a satisfactory manner, the wet scrubber liquid flow rate on a continuous basis.² (R 336.1225, R 336.1702(a), R 336.1901, R 336.1910, R 336.1205(1))~~
- ~~2. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.² (R 336.1205(1), R 336.1225, R 336.1702(a), R 336.1901)~~
- ~~3. The permittee shall record daily, in a satisfactory manner, the wet scrubber liquid flow rate to demonstrate compliance with the VOC emission rate limit listed in SC 1.1. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1205(1), R 336.1225, R 336.1702(a))~~
- ~~4. The permittee shall calculate, in a satisfactory manner, VOC emission rates for FGETHANOL to demonstrate compliance with the VOC emission rate limit listed in SC 1.1. The emission rate may be calculated based upon monthly records, prorated to an hourly rate. The permittee shall keep all records on file and make them available to the Department upon request.² (R 336.1225, R 336.1702(a), R 336.1205)~~

VII. REPORTING

- ~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.4213(3)(c)(iii))~~
- ~~2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.4213(3)(c)(ii))~~
- ~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.4213(4)(e))~~

See Appendix 8-2

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).
²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGNSPSVva FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

All pumps, valves, and pressure relief devices in light liquid and heavy liquid service; all valves and pressure relief devices in gas/vapor service; each sampling connection; and each open ended valve or line and all associated closed vent systems and control devices.

Emission Units: ~~EUPRETREAT, EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE~~

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. ~~The permittee shall operate closed vent systems and control devices used to comply with 40 CFR Part 60, Subpart VVa at all times when emissions may be vented to them. (40 CFR 60.482-10a(m))~~

~~Valves, Bleed Lines, Open Ended Lines:~~

1. ~~Each open ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. (40 CFR 60.482-6a(b))~~
2. ~~When a double block and bleed system is used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall be sealed with a cap, blind flange, plug, or second valve at all other times. (40 CFR 60.482-6a(c))~~
3. ~~Any valve in gas/vapor or light liquid service that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of SC V.5 and V.6 provided that the valve has no external actuating mechanism in contact with the process fluid and is operated with emissions less than 500 ppm above background. (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))~~

4. ~~The permittee may elect to comply with an allowable percentage of valves leaking of equal to or less than 2.0 percent. (40 CFR 60.483-1a(a), 40 CFR 60.483-1a(d))~~

Pressure Relief Devices in Gas/Vapor Service:

1. ~~Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. (40 CFR 60.482-4a(a))~~
2. ~~After each pressure release, the pressure relief shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background as soon as practicable but no later than 5 calendar days after the pressure release, except as provided in Delay of Repair, SC IX.6-11. (40 CFR 60.482-4a(b)(1))~~
3. ~~Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device is exempted from the requirements of SC III.6, III.7 and V.13. (40 CFR 60.482-4a(c))~~
4. ~~Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the requirements of SC III.6, III.7, and V.13 provided that a new rupture disk is installed upstream of the pressure relief device as soon as practicable but no later than 5 calendar days after each pressure release, except as provided in Delay of Repair, SC IX.6-11. (40 CFR 60.482-4a(d))~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

Compressors:

1. ~~Any compressor must be designed according to one of the following specifications: (40 CFR 60.482-3a(a), 40 CFR 60.482-3a (b), 40 CFR 60.482-3a (c), 40 CFR 60.5400(a), 40 CFR 60.482-3a(f)(1))~~
- ~~a. Be designated and demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background, OR~~
- ~~b. Be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service. Each compressor seal system shall be~~
- ~~i. Operated with a barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or~~
- ~~ii. Equipped with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-4a; or~~
- ~~iii. Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.~~
2. ~~Each compressor barrier fluid system as described in Condition IV.1 shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system, or both. (40 CFR 60.482-3a(d), 40 CFR 60.482-3a(e), 40 CFR 60.482-3a(f))~~

Open-Ended Valves or Lines:

1. ~~Except as provided in 40 CFR 60.482-6a(d), each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations required process fluid flow through the open-ended valve or line. (40 CFR 60.482-6a(a))~~

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. ~~(R-336.1213(3)(b)(ii))~~

1. ~~Each pump in light liquid service, each compressor, and each valve in gas/vapor service and in light liquid service designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background shall be tested for compliance initially upon designation, annually, and at other times requested by the AQD. (40 CFR 60.482-2a(e), 40 CFR 60.482-3a(i)(2), 40 CFR 60.482-7a(f)(3))~~

Pumps in Light Liquid Service:

1. ~~Except as provided in SC V.4, each pump in light liquid service shall be monitored monthly to detect leaks. A pump that begins operation in light liquid service after the initial startup date of the process unit must be monitored for the first time within thirty days after the end of its startup period except for a pump that replaces a leaking pump and except as provided in SC V.4. A leak is detected when an instrument reading of 2,000 ppm or greater is measured. (40 CFR 60.482-2a(b)(1)(ii))~~
2. ~~Except as provided in SC V.4, each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. If liquids are dripping from the pump seal, the permittee shall either designate the visual indications as a leak and repair the leak within 15 days of detection by eliminating the visual indications of liquids dripping or monitor the pump within 5 days and repair the leak using the procedures in SC IX.2. (40 CFR 60.482-2a(a)(2), 40 CFR 60.482-2a(b)(2), 40 CFR 60.482-2a(d)(4))~~
3. ~~Any pump in light liquid service is exempt from the testing requirements of SC V.2 and SC V.3 provided it meets one of the following stipulations:~~
- a. ~~The pump is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, provided that the pump has no externally actuated shaft penetrating the pump housing and is demonstrated to be operating with no detectable emissions. (40 CFR 60.482-2a(e))~~
 - b. ~~The pump is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a process or to a fuel gas system or a control device. (40 CFR 60.482-2a(f))~~
 - c. ~~The pump is equipped with a dual mechanical seal system that includes a barrier fluid system, provided that the pump meets the following: (40 CFR 60.482-2a(d)(1), (2), (3), (4), and (5))~~
 - i. ~~Each dual mechanical seal system is:~~
 - A. ~~Operated with no barrier fluid at a pressure that is all times greater than the pump stuffing box pressure; or~~
 - B. ~~Equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed vent system to a control device that complies with the requirements of 40 CFR 60.482-10; or~~
 - C. ~~Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.~~
 - ii. ~~The barrier fluid system is in heavy liquid service or is not in VOC service.~~
 - iii. ~~Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.~~
 - A. ~~Each sensor shall be checked daily or equipped with an audible alarm.~~
 - B. ~~The permittee determines, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both.~~
 - C. ~~If the sensor indicates failure of the seal system, the barrier fluid system, or both, based on criterion established, a leak is detected and shall be repaired as specified in SC IX.2.~~
 - iv. ~~Each pump is checked by visual inspection, each calendar week, for indications of liquids dripping from the pump seals. If there are indications of liquids dripping from the pump seal at the time of the weekly inspection, the permittee shall perform the following procedures prior to the next required inspection:~~
 - A. ~~Monitor the pump within 5 business days to determine if there is a leak of VOC in the barrier fluid; or~~
 - B. ~~Designate the visual indications of liquids dripping as a leak.~~

Valves in Gas/Vapor Service and in Light Liquid Service:

1. ~~Each valve in gas/vapor service shall be monitored monthly to detect leaks. A leak is detected when an instrument reading of 500 ppm or greater is measured. If a leak is not detected for 2 successive months, the valve may be monitored the first month of every quarter, beginning the next quarter, until a leak is detected. As an alternative to monitoring all of the valves in the first month of the quarter, the permittee may elect to subdivide the process unit into two or three subgroups and monitor each subgroup in a different month during the quarter, provided each subgroup is monitored every three months. When a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. The permittee may elect to comply with the alternative work practices specified in SC V.8 and SC V.9. (40 CFR 60.482-7a(1), 40 CFR 60.482-7a(b), 40 CFR 60.482-7a(c)(1)(i) and (j), 40 CFR 60.482-7a(c)(2), 40 CFR 60.482-3a(a)(1))~~

~~This requirement does not apply to the following:~~

- ~~a. Any valve in gas/vapor or light liquid service that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, provided the valve has no external actuating mechanism in contact with the process fluid and is operated with emissions less than 500 ppm above background (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))~~
- ~~b. A facility where the permittee has chosen the alternative method of demonstrating compliance by staying within the allowable percentage of valves leaking of equal to or less than 2.0 percent, as allowed by (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))~~
- ~~c. Any valve designated as Unsafe to Monitor; see SC IX.12~~
- ~~d. Any valve designated as Unsafe to Monitor or Difficult to Monitor; see SC IX.16~~

2. ~~Any valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be: (40 CFR 60.482-7a(a)(2))~~

- ~~a. Monitored as in Condition V.6. The valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation; or~~
- ~~b. If the existing valves in the process unit are monitored in accordance with SC III.9, SC V.7, or SC V.8, count the new valve as leaking when calculating the percentage of valves leaking as described in 40 CFR 60.483-2a(b)(5). If less than 2.0 percent of the valves are leaking for that process unit, the valve must be monitored for the first time during the next scheduled monitoring event for existing valves in the process unit or within 90 days, whichever comes first~~

~~This requirement does not apply to the following:~~

- ~~• A valve that replaces a leaking valve~~
- ~~• A facility where the permittee has chosen the alternative method of demonstrating compliance by staying within the allowable percentage of valves leaking of equal to or less than 2.0 percent, as allowed by (40 CFR 60.482-7a(f)(1), 40 CFR 60.482-7a(f)(2))~~
- ~~• Any valve designated as Unsafe to Monitor; see Condition IX.12~~
- ~~• Any valve designated as Unsafe to Monitor or Difficult to Monitor; see Condition IX.16~~

3. ~~Any valve in gas/vapor or light liquid service that is designated as unsafe to monitor shall be monitored as frequently as practicable during safe-to-monitor times and any valve that is designated as difficult to monitor shall be monitored at least once per calendar year. (40 CFR 60.482-7a(g)(2), 40 CFR 60.482-7a(h)(3))~~

4. ~~If electing to comply with the alternative method of demonstrating compliance by staying within a percentage of leaking valves equal to or less than 2.0 percent, the permittee shall monitor for leaks initially upon designation, annually, and at other times requested by the AQD. (40 CFR 60.483-1a(b)(2))~~

5. ~~After initially complying with a quarterly leak detection program as specified in SC V.5 for 2 consecutive quarters with the percent of valves leaking equal to or less than 2.0, the permittee may begin to skip one of the quarterly leak detection periods for the valves in gas/vapor or light liquid service. If the percent of valves leaking is greater than 2.0, the permittee shall return to the schedule specified in SC V.5 but may elect to use this section again at a later date. (40 CFR 60.483-2a(a), (b)(1), (2), and (4))~~

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6. ~~After initially complying with SC V.5 and SC V.9 for 5 consecutive quarterly leak detection periods with the percent valves equal to or less than 2.0, the permittee may begin to skip three of the quarterly leak detection periods for the valves in gas/vapor or light liquid service. If the percent of valves leaking is greater than 2.0, the permittee shall return to the schedule specified in SC V.5 may elect to use this SC again at a later date. (40 CFR 60.483-2a(a), (b)(1), (3), and (4))~~
7. ~~A valve that begins operation in gas/vapor service or light liquid service after the initial startup date for a process unit following one of the alternative standards in this section must be monitored in accordance with the initial schedules specified in SC V.5 or SC V.6, as appropriate, before the less frequent schedules allowed by SC V.9 or SC V.10 may be applied to that valve. (40 CFR 60.483-2a(b)(7))~~

Pressure-Relief Valves

1. ~~No later than 5 calendar days after a pressure release, the pressure relief device in gas/vapor service shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. (40 CFR 60.482-4a(b)(2))~~

Connectors

1. ~~The permittee shall monitor all connectors for process leaks. A leak is detected if an instrument reading of greater than or equal to 500 ppm is measured. The required period in which monitoring must be conducted shall be determined by the following schedule using the monitoring results from the preceding monitoring period. If a connector is found to be leaking, it shall be re-monitored once within 90 days after repair to confirm that it is not leaking. (40 CFR 60.482-11a(b)(3), 40 CFR 60.482-11a(b)(3)(iv), 40 CFR 60.482-11a(b))~~
- a. ~~If the percent leaking connectors in the process unit were greater than or equal to 0.5 percent, then monitor within 12 months (1 year).~~
- b. ~~If the percent leaking connectors in the process unit was greater than or equal to 0.25 percent but less than 0.5, then monitor within 4 years. The permittee may comply with the requirements of this paragraph by monitoring at least 40 percent of the connectors within 2 years of the start of the monitoring period, provided all connectors have been monitored by the end of the 4 year monitoring period.~~
- c. ~~If the percent leaking connectors in the process unit was less than 0.25 percent, then monitor as at least 50 percent of the connectors within four years of the start of the monitoring period; and~~
- i. ~~If the percent of leaking connectors calculated from the monitoring results is greater than or equal to 0.35 percent of the monitored connectors, the permittee shall monitor as soon as practical, but within the next 6 months, all connectors that have not yet been monitored during the monitoring period. At the conclusion of monitoring, a new monitoring period shall be started based on the percent of leaking connectors within the total monitored connectors; or~~
- ii. ~~If the percent of leaking connectors calculated from the monitoring results is less than 0.35 percent of the monitored connectors, the permittee shall monitor all connectors that have not yet been monitored within eight years of the start of the monitoring period.~~

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. ~~(R-336.4213(3)(b)(iii))~~

1. ~~The following information pertaining to all equipment subject to the requirements of 40 CFR 60.482-1a to 60.482-10a shall be recorded in a log that is kept in a readily accessible location: (40 CFR 60.486a(e))~~
- a. ~~A list of identification numbers for equipment subject to the requirements of 40 CFR Part 60, Subpart VVa.~~
- b. ~~A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of SC III.4, III.6, and V.4(a).~~
- c. ~~The designation of equipment as subject to the requirements of SC III.4, III.6, and V.4(a) shall be signed by the permittee.~~
- d. ~~A list of equipment identification numbers for pressure relief devices required to comply with SC III.6, III.7, and V.12.~~
- e. ~~The dates of each compliance test as required in SC V.4.~~
- f. ~~The background level measured during each compliance test.~~
- g. ~~The maximum instrument reading measured at the equipment during each compliance test.~~

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- h. A list of identification numbers for equipment in vacuum service.
 - i. The date and results of the weekly visual inspection for indications of liquids dripping from pumps in light liquid service.
 - j. Records of the information for monitoring instrument calibrations conducted:
 - i. Date of calibration and initials of the operator performing the calibration.
 - ii. Calibration gas cylinder identification, certification date, and certified concentration.
 - iii. Instrument scale(s) used.
 - iv. A description of any corrective action taken if the meter readout could not be adjusted to correspond to the calibration gas value.
 - v. Results of each calibration drift assessment.
 - k. The connector monitoring schedule for each process unit as specified in SC V.13;
 - l. Records of the release from a pressure relief device subject to SC III.9.
2. When a leak is detected from a pump in light liquid service, a compressor, a valve in gas/vapor service or light liquid service, a pressure relief device in light liquid service, or connectors, the following information shall be recorded in a log and shall be kept in a readily accessible location:² (40 CFR 60.486a(e))
- a. The instrument and operator identification numbers and the equipment identification number.
 - b. The date the leak was detected and the dates of each attempt to repair the leak.
 - c. Repair methods applied in each attempt to repair the leak.
 - d. Maximum instrument reading measured at the time the leak is successfully repaired or determined non-repairable, except when a pump is repaired by eliminating indications of liquids dripping.
 - e. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.
 - f. The signature of the owner or operator whose decision it was that repair could not be affected without a process unit shutdown.
 - g. The expected date of successful repair of the leak if a leak is not repaired within 15 calendar days.
 - h. Dates of process unit shutdown that occurs while the equipment is unrepaired.
 - i. The date of successful repair of the leak.
3. The following information pertaining to all valves, pumps, and connectors designated as unsafe to monitor or difficult to monitor shall be recorded in a log that is kept in a readily accessible location:² (40 CFR 60.486a(f))
- a. A list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve.
 - b. A list of identification numbers for valves, pump, and connector that are designated as difficult to monitor, an explanation for each valve, pump, and connector stating why the valve, pump, and connector is difficult to monitor, and the schedule for monitoring each valve, pump, and connector.
4. The permittee shall record a schedule of monitoring and the percent of valves found leaking during each monitoring period for valves complying with SC V.10 and V.11. (40 CFR 60.486a(g), 40 CFR 60.482-1a(a))
5. The following information shall be recorded in a log that is kept in a readily accessible location:² (40 CFR 60.486a(h))
- a. Design criterion required in SC V.4(c) and IV.1 and explanation of the design criterion.
 - b. Any changes to the criterion and the reason for the changes.
6. The permittee shall keep the following information for closed vent systems and flares described in 40 CFR 60.482-10a in a readily accessible location:² (40 CFR 60.486a(d))
- a. Detailed schematics, design specifications, and piping and instrumentation diagrams.
 - b. The dates and descriptions of any changes in the design specifications.
 - c. A description of the parameter(s) monitored as required by 40 CFR 60.482-10a(e), to ensure the control devices are operated and maintained in conformance with the design and an explanation of why the parameter(s) was/were selected for the monitoring.
 - d. Periods when the closed vent systems and control devices are not operated as designed, including periods when a flare pilot light does not have a flame.
 - e. Dates of startups and shutdowns of the closed vent systems and control devices.

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7. ~~The permittee shall record the following information for each monitoring event required by SC V.1, SC V.2, SC V.5, SC V.10, SC V.11, SC V.13: (40 CFR 60.486a(a)(3))~~
 - a. ~~Monitoring Instrument Identification.~~
 - b. ~~Operator Identification.~~
 - c. ~~Equipment Identification.~~
 - d. ~~Date of monitoring.~~
 - e. ~~Instrument reading.~~
8. ~~The permittee shall keep a record of the start date and end date of each monitoring period for each connector. (40 CFR 60.482-11a(b)(3)(v), 40 CFR 60.5400(a))~~
9. ~~If electing to comply with the alternative monitoring requirements listed in SC V.5 for valves in gas/vapor service and in light liquid service, the permittee shall keep records of the valves assigned to each subgroup. (40 CFR 60.482-7a(c)(ii))~~
10. ~~Each sensor on a compressor barrier fluid system as described in SC IV.1 shall be checked daily or shall be equipped with an audible alarm. Based on design considerations and operating experience, the permittee shall determine a criterion that indicates failure of the seal system, barrier fluid system, or both. If the sensor indicates failure of the seal system, barrier fluid system, or both, based on the established criterion, a leak is detected. (40 CFR 60.482-3a(d), 40 CFR 60.482-3a(e), 40 CFR 60.482-3a(f))~~

VII. REPORTING

1. ~~Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(iii))~~
2. ~~Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(ii))~~
3. ~~Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(c))~~
4. ~~The permittee shall submit semiannual reports. The reports shall be submitted at the same time as the semiannual reports required by SC VII.2. All semiannual reports shall contain the following information:² (40 CFR 60.487a(c))~~
 - a. ~~Process unit Identification;~~
 - b. ~~For each month during the semiannual reporting period:~~
 - i. ~~The number of valves for which leaks were detected as described in SC V.5, SC V.10, and SC V.11.~~
 - ii. ~~The number of valves for which leaks were not repaired as required in SC IX.2.~~
 - iii. ~~The number of pumps for which leaks were detected as described in SC V.2 and SC V.3.~~
 - iv. ~~The number of pumps for which leaks were not repaired as required in SC IX.2.~~
 - v. ~~The number of compressors for which leaks were detected as described in SC VI.10.~~
 - vi. ~~The number of compressors for which leaks were not repaired as required in SC IX.2.~~
 - vii. ~~The number of connectors for which leaks were detected as described in SC V.13.~~
 - viii. ~~The number of connectors for which leaks were not repaired as required in SC IX.2.~~
 - c. ~~Dates of process unit shutdowns which occurred within the semiannual reporting period.~~
 - d. ~~Revisions to items reported if changes have occurred since the initial report or subsequent revisions to the initial report.~~
6. ~~The permittee shall notify the AQD no less than 90 days prior to electing to comply with the alternative standard for valves of demonstrating the percentage of valves leaking is less than or equal to 2.0 percent, as allowed by 40 CFR 60.48207a(f)(1) and (2). (40 CFR 60.483-1a(b)(1), 40 CFR 60.483-2a(a)(2), 40 CFR 60.487a(d))~~

VIII. ~~STACK/VENT RESTRICTION(S)~~

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above-Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. ~~OTHER REQUIREMENT(S)~~

~~1. The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and VVa, as they apply to the equipment in ECNSRS/VVa (40 CFR Part 60, Subparts A and VVa)~~

Leak Detection and Repair:

- ~~1. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 days after it is detected, except as provided in SC IX.6-11 (Delay of Repair). A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.² (40 CFR 60.482-2a(c), 40 CFR 60.482-3a(g), 40 CFR 60.482-8a(c), 40 CFR 60.482-11a(d), 40 CFR 60.483-1a(b)(3), 40 CFR 60.482-7a(d))~~
- ~~2. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method, from a pressure relief device in light liquid service, the permittee shall monitor the equipment within 5 days or eliminate the visual, audible, olfactory, or other indication of a potential leak within 5 calendar days of detection.² (40 CFR 60.482-8a(a))~~
- ~~3. If any inaccessible connector in gas/vapor service or light liquid service is observed by visual, audible, olfactory, or other means, to be leaking, the visual, audible, olfactory, or other indications of a leak to the atmosphere shall be eliminated as soon as practicable. (40 CFR 60.482-11a(f)(2))~~
- ~~4. When a leak is detected from a pump in light liquid service, a valve in gas/vapor service or light liquid service, a compressor, or a connector in gas/vapor service or light liquid service, a weatherproof and visible identification marked with the equipment identification number, shall be attached to the leaking equipment. The identification on a valve may be removed after it has been monitored for 2 successive months as specified in SC V.5 and no leak has been detected during those 2 months. The identification on a connector may be removed after it has been monitored as specified in SC V.13 and no leak has been detected during that monitoring period. The identification equipment, except on a valve or connector, may be removed after it has been repaired.² (40 CFR 60.486a(b))~~

Delay of Repair

- ~~1. The delay of repair for which leaks have been detected will be allowed if repair within 15 days is technically infeasible without a process unit shutdown. Repair of the equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.² (40 CFR 60.482-9a(a))~~
- ~~2. The delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service. (40 CFR 60.482-9a(b))~~

3. ~~Delay of repair for valves and connectors will be allowed if: ² (40 CFR 60.482-9a(c))~~
- ~~The permittee demonstrates that emissions of purged material resulting from the immediate repair are greater than the fugitive emissions likely to result from the delay of repair; and~~
 - ~~When repair procedures are effected, the purged material is collected and destroyed or recovery in a control device complying with 40 CFR 60.482-10a.~~
4. ~~Delay of repair beyond a process unit shutdown will be allowed for a valve, if the valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown. ² (40 CFR 60.482-9a(e))~~
5. ~~Delay of repair for pumps will be allowed if repair requires the use of a dual-mechanical seal system that includes a barrier fluid system and repair is completed as soon as practicable, but not later than 6 months after the leak was detected. ² (40 CFR 60.482-9a(d))~~
6. ~~When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if 2 consecutive monthly monitoring instrument readings are below the leak definition. ² (40 CFR 60.482-9a(f))~~

Unsafe to Monitor and Difficult to Monitor

1. ~~For any pump in light liquid service, any valve in gas/vapor service or in light liquid service, and any connector that is unsafe to monitor, the permittee shall demonstrate that the pump, valve, or connector is unsafe to monitor because monitor personnel would be exposed to an immediate danger as a consequence of complying with SC V.2, SC V.3, SC V.5, SC V.6, and SC V.13. ² (40 CFR 60.482-2a(g)(1), 40 CFR 60.482-7a(g)(1), 40 CFR 60.482-11a(e)(1))~~
2. ~~The permittee shall maintain a written plan that requires monitoring of pumps in light liquid service that are unsafe to monitor as frequently as practicable during safe-to-monitor times. (40 CFR 60.482-2a(g)(2))~~
3. ~~The permittee shall maintain a written plan that requires monitoring of connectors in gas/vapor service or light liquid service that are unsafe to monitor as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures specified in SC IX.2 if a leak is detected. (40 CFR 60.482-11a(e)(2))~~
4. ~~Any valve in gas/vapor service or in light liquid service that is designated as difficult to monitor or unsafe to monitor is exempt from the requirements of SC V.5 if: ² (40 CFR 60.482-7a(g) and (h), 40 CFR 60.482-1a(a))~~
- ~~The permittee can demonstrate that the difficult-to-monitor valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface;~~
 - ~~The process unit within which the difficult-to-monitor valve is located becomes an affected facility through 40 CFR 60.14 or 60.15 or the permittee designates less than 3.0 percent of the total number of valves as difficult-to-monitor; and~~
 - ~~The permittee follows a written plan that requires monitoring of the difficult-to-monitor valve at least once per calendar year;~~
 - ~~The permittee demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with SC V.5;~~
 - ~~The permittee follows a written plan that requires monitoring of the unsafe-to-monitor valve as frequently as practicable during safe-to-monitor times.~~

5. ~~Any connector in gas/vapor service or light liquid service that is inaccessible is exempt from the monitoring requirements of SC V.13 and the leak repair requirements of SC IX.2. An inaccessible connector is one that meets any of the following: (40 CFR 60.482-11a(f)(1))~~
- ~~a. Buried;~~
 - ~~b. Insulated or in a manner that prevents access to the connector by a monitor probe;~~
 - ~~c. Obstructed by equipment or piping that prevents access to the connector by a monitor probe;~~
 - ~~d. Unable to be reached from a wheeled scissor lift or hydraulic type scaffold that would allow access to connectors up to 25 feet above the ground;~~
 - ~~e. Inaccessible because it would require elevating the monitoring personnel more than 7 feet above a permanent support surface or would require the erection of scaffold; or~~
 - ~~f. Not able to be accessed at any time in a safe manner to perform monitoring.~~

Footnotes:

¹.This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

².This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGMON FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

Miscellaneous Organic Chemical Manufacturing Process Units subject to National Emission Standards for Hazardous Air Pollutants, Subpart FFFF

Emission Unit: EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE, EUETHLOAD

POLLUTION CONTROL EQUIPMENT

Wet scrubber for EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, and EUMOLSIEVE

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Each closed vent system shall be operated to collect the regulated material vapors from the applicable emission points and route the collected vapors to a control device. (40 CFR 63.2450(e), 40 CFR 63.982(e), 40 CFR 63.983(a)(1))
2. Each closed vent system shall be operated at all times when emissions are vented to or collected by them. (40 CFR 63.2450(e), 40 CFR 63.982(e), 40 CFR 63.983(a)(2))
3. If any closed vent system has a bypass which is equipped with a flow indicator, as specified in SC IV.2, the permittee shall not operate the affected equipment unless the flow indicator is installed and operating properly. (40 CFR 63.2450(e), 40 CFR 63.982(e), 40 CFR 63.983(a)(3))

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. Each closed vent system shall be designed to collect the regulated material vapors from the applicable emission points and route the collected vapors to a control device. (40 CFR 63.2450(e), 40 CFR 63.982(e), 40 CFR 63.983(a)(1))
2. Except for safety equipment as specified in 40 CFR 63.983(3), the permittee shall equip any bypass lines which could divert a vent stream to the atmosphere with one of the following: (40 CFR 63.2450(e), 40 CFR 63.982(e), 40 CFR 63.983(a)(3))
 - a. A flow indicator, installed at the entrance to the bypass line, and capable of taking periodic readings and creating records of them
 - b. A car seal or lock and key to secure the bypass line in the non-diverting position.

V. TESTING/SAMPLINGRecords shall be maintained on file for a period of five years. ~~(R 336.1213(3)(b)(ii))~~

1. ~~Performance tests for the wet scrubber exhaust may be waived upon written application to the AQD if, in the judgment of the AQD, the wet scrubber exhaust is meeting any relevant standards on a continuous basis. (40 CFR 63.997(b)(2))~~
2. ~~If the wet scrubber is counted upon for HAP reduction to meet any relevant standard, performance tests for the wet scrubber exhaust are required. Any performance tests shall be conducted at maximum representative operating conditions for the process, unless otherwise specified or approved by the AQD. During the performance test the permittee may operate the wet scrubber at maximum or minimum representative operating conditions, whichever results in lower emission reduction. Operation during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purposes of a performance test. (40 CFR 63.997(e)(1)(i))~~
3. ~~For any Group 2 emission point that becomes a Group 1 emission point after the compliance date for the facility, an initial compliance demonstration, as specified in 40 CFR Part 63, Subpart FFFF, shall be conducted within 150 days after the switch occurs.² (40 CFR 63.2445(d))~~

VI. MONITORING/RECORDKEEPINGRecords shall be maintained on file for a period of five years. ~~(R 336.1213(3)(b)(ii))~~

1. ~~The permittee shall retain copies of all initial notifications required by 40 CFR Part 63, Subpart FFFF. (40 CFR 63.2525(a))~~
2. ~~The permittee shall keep each applicable record required by 40 CFR Part 63, Subpart A and in referenced subparts of 40 CFR Part 63.² (40 CFR 63.2525(a))~~
3. ~~The permittee shall maintain the following records for each operating scenario:² (40 CFR 63.2525(b)(1) through (7))~~
 - a. ~~A description of the process and process equipment used.~~
 - b. ~~Identification of related process vents, wastewater point of determination (POD), storage tanks, and transfer racks~~
 - c. ~~The applicable control requirements of 40 CFR Part 63, Subpart FFFF, including the level of required control, and for vents, the level of control of each vent~~
 - d. ~~The control device or treatment process used, as applicable, including a description of operating and/or testing conditions for any associated control device~~
 - e. ~~The process vents, wastewater POD, transfer racks, and storage tanks that are simultaneously routed to the control device or treatment process(es)~~
 - f. ~~The applicable monitoring requirements of 40 CFR Part 63, Subpart FFFF and any parametric level that assures compliance for all emissions routed to the control device or treatment process~~
 - g. ~~Calculations and engineering analyses required to demonstrate compliance.~~
4. ~~If any closed vent system is equipped with a bypass as specified in SC IV.2, the permittee shall maintain records of one of the following, as appropriate:~~
 - a. ~~For a bypass equipped with a flow indicator, a reading at least once each fifteen minutes: Hourly records of whether the flow meter was operating and whether a diversion was detected at any time during the hour; records of all periods when the vent stream is diverted from the control device; and records of all periods when the flow meter is not operating. (40 CFR 63.983(a)(3)(i), 40 CFR 63.983(b)(4)(i), 40 CFR 63.983(d)(1)(ii)(A), 40 CFR 63.983(c)(ii))~~
 - b. ~~For a bypass equipped with a seal or lock mechanism to secure the bypass in the non-diverting position: A record that monthly visual inspections of the seals or closure mechanism were done; a record of all periods when the seal mechanism is broken, the bypass valve position has changed, or the key for a lock and key type lock has been checked out, and records of any car seal that has been broken. (40 CFR 63.983(a)(3)(ii), 40 CFR 63.983(d)(1)(ii)(B), 40 CFR 63.983(c)(iii))~~

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5. ~~The permittee shall keep a record of each time a safety device is opened to avoid unsafe conditions in accordance with 40 CFR 63.2450(e).² (40 CFR 63.2525(f))~~
6. ~~The permittee shall maintain the following records when a leak is detected in any closed vent system: (40 CFR 63.998(d)(1)(iii))~~
 - a. ~~The instrument, equipment identification number, and the operator name, initials or identification number.~~
 - b. ~~The date the leak was detected.~~
 - c. ~~The date of the first attempt to repair the leak.~~
 - d. ~~The date of successful repair of the leak.~~
 - e. ~~The maximum instrument reading detected for concentration in parts per million by volume from the leak, measured as required by 40 CFR 63.983(c) using Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives, after the leak is successfully repaired or determined to be non-repairable.~~
 - f. ~~If the leak is not repaired within 15 days after discovery, the fact that the repair was delayed and the reason for that delay. The permittee may develop and keep a written procedure that identifies the conditions that justify a delay of repair. In such cases, reasons for delay of repair may be documented by citing the relevant sections of the written procedure.~~
7. ~~For each instrumental or visual inspection to check for leaks in a closed vent system during which no leaks are detected, the permittee shall record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. (40 CFR 63.998(d)(1)(iv))~~
8. ~~The permittee shall maintain records of the occurrence and duration of each start-up, shutdown, and malfunction of operation of process equipment, or of air pollution control equipment used to comply with 40 CFR Part 63, Subpart FFFF, during which excess emissions as defined in 40 CFR Part 63, Subpart FFFF occur. (40 CFR 63.998(d)(4)(i))~~
9. ~~The permittee shall maintain records for each start-up, shutdown, and malfunction during which excess emissions occur, documenting actions taken as specified by the start-up, shutdown, and malfunction plan, and of any actions taken that are not consistent with that plan. (40 CFR 63.998(d)(4)(ii))~~
10. ~~For each Group 2 Wastewater Stream, the permittee shall keep in a readily accessible location the following records: (40 CFR 63.147(b)(8))~~
 - a. ~~Process unit identification and description of process unit~~
 - b. ~~Stream identification code~~
 - c. ~~Concentration of Table 8 and/or Table 9 compounds in parts per million, by weight, including documentation of the methodology used to determine concentration~~
 - d. ~~Flow rate in liter per minute.~~
11. ~~For each Group 2 Transfer Rack, the permittee shall record and maintain the following information in a readily accessible location on site: (40 CFR 63.126(c), 40 CFR 63.130(f))~~
 - a. ~~The design and actual annual throughput of the loading rack, on the basis of a 12-month rolling time period~~
 - b. ~~An analysis documenting the weight percent of organic HAPs in the liquid loaded~~
 - c. ~~An analysis documenting the annual rack-weighted average HAP partial pressure of the transfer rack~~
12. ~~The permittee shall determine the Total Resource Effectiveness (TRE) Index Value, as specified in 40 CFR 63.115(d), for all process vents in equipment subject to 40 CFR Part 63, Subpart FFFF, except as specified in 40 CFR 63.2455(b)(1) through (3).² (40 CFR 63.2455(b))~~
13. ~~For any closed vent system bypass line equipped with a seal mechanism as specified in Condition IV.2, the permittee shall visually inspect the seal or closure mechanism at least once per calendar month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. (40 CFR 63.983(b)(4)(ii))~~
14. ~~Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall conduct an initial inspection of any closed vent system using Method 21 of 40 CFR Part 60, Appendix A or one of the alternative methods also specified in 40 CFR 63.983(c); (40 CFR 63.983(b)(1)(i)(A) and (ii))~~

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15. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall inspect any closed vent system constructed of hard piping once each calendar year for visible, audible, or olfactory indications of leaks. ~~(40 CFR 63.983(b)(1)(i)(B))~~
16. If the inspection of a closed vent system constructed of hard piping, as required in Condition IX.5, above, reveals indications of any leak, the permittee shall either eliminate the leak or shall monitor the equipment as specified in 40 CFR 63.983(c), using either Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives. ~~(40 CFR 63.983(d)(1))~~
17. Except for any closed vent systems that are designated as unsafe or difficult to inspect as provided in 40 CFR 63.983(b)(2) and (3), the permittee shall inspect any closed vent system constructed of ductwork once each calendar year as specified in 40 CFR 63.983(c), using either using Method 21 of 40 CFR Part 60, Appendix A or one of the specified alternatives. ~~(40 CFR 63.983(b)(1)(ii))~~
18. The permittee shall inspect any closed vent systems which have been determined to be unsafe to inspect as frequently as practical during safe-to-inspect times; provided however that inspection is not required more than once annually. 40 CFR 63.983(b)(2)(i) defines unsafe to inspect as equipment where inspecting personnel would be exposed to imminent or potential danger as a consequence of the inspection. ~~(40 CFR 63.983(b)(2)(ii))~~
19. The permittee shall inspect any closed vent systems which have been determined to be difficult to inspect at least once every 5 years. 40 CFR 63.983(b)(3)(i) defines difficult to inspect as equipment which cannot be inspected without elevating the inspecting more than 2 meters (7 feet) above a support surface. ~~(40 CFR 63.983(b)(3)(ii))~~
20. A leak in a closed vent system is indicated by an instrument reading greater than 500 parts per million by volume above background, or by visual inspections. Leaks shall be repaired according to the following schedule:
 - a. A first attempt at repair shall be made no later than 5 days after the leak is detected. ~~(40 CFR 63.983(d)(2)(i))~~
 - b. Except as provided in Condition IX.10(c) below, repairs shall be completed no later than 15 days after the leak is detected or at the beginning of the next introduction of vapors to the system, whichever is later. ~~(40 CFR 63.983(d)(2)(ii))~~
 - c. Delay of repair of the leak is allowed if repair within 15 days after a leak is detected is technically infeasible or unsafe without a closed vent system shutdown as defined in 40 CFR 63.981, or if the permittee determines that emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed as soon as is practical, but not later than the end of the next closed vent system shutdown. ~~(40 CFR 63.983(d)(3))~~

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. ~~(R-336.1213(3)(c)(ii))~~
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. ~~(R-336.1213(3)(c)(i))~~
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. ~~(R-336.1213(4)(c))~~
4. Semiannual report and certification of compliance with the provisions of 40 CFR Part 63, Subpart FFFF, including all information required in 40 CFR 63.2520(e)(1) through (5), to be submitted concurrently with the semiannual reports detailed in Condition VII.2, above. ~~(40 CFR 63.2520(b))~~

5. For a performance test to demonstrate compliance with any of the provisions of 40 CFR Part 63, Subpart FFFF, the permittee shall submit a notification of intent to conduct a performance test to the AQD District Supervisor at least 60 calendar days before the performance test is scheduled to begin. The permittee shall also submit two complete test protocols to the AQD, one to the Technical Programs Unit Supervisor and one to the District Supervisor, for approval at least 30 days prior to the anticipated test date. The protocol shall describe the test method(s) and the maximum routine operating conditions, including targets for key operational parameters associated with air pollution control equipment to be monitored and recorded during testing.² (40 CFR 63.2615(e), 40 CFR 63.9(e), R-336.12001(3))

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

- The permittee shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants, as specified in 40 CFR Part 63, Subpart A; and for Subpart FFFF, for Miscellaneous Organic Chemical Manufacturing.² (40 CFR Part 63, Subparts A and FFFF)
- Excused excursions, as defined in 40 CFR Part 63, Subpart SS, are not allowed.² (40 CFR 63.2450(m)(3))
- When the term "storage vessel" is used in 40 CFR Part 63, Subpart SS, the term "storage tank" as defined in 40 CFR 63.2550 applies for the purposes of Subpart FFFF.² (40 CFR 63.2470(e)(2))
- For any equipment, emission stream, or wastewater stream subject to the provisions of both 40 CFR Part 63, Subpart FFFF and another rule, the permittee may elect to comply only with the provisions as specified in 40 CFR 63.2535(a) through (i). The permittee must also identify the subject equipment, emission stream, or wastewater stream, and the provisions that will be complied with, in the notification of compliance status report required by 40 CFR 63.2520(e).² (40 CFR 63.2535)
- For any Group 2 emission point that becomes a Group 1 emission point after the compliance date for the facility, the permittee shall comply with the Group 1 requirements beginning on the date the switch occurs. (40 CFR 63.2446(d))
- For each Group 2 Wastewater Stream, the permittee shall redetermine group status as necessary to determine whether the stream is Group 1 or Group 2 whenever process changes are made that could reasonably be expected to change the stream to Group 1. The permittee shall establish and maintain a Management of Change Procedure to ensure this redetermination is performed whenever required. (40 CFR 63.132(e)(3))
- The permittee shall maintain a written plan that requires inspection of any closed vent systems designated as unsafe to inspect as frequently as practical during safe to inspect times; provided however that inspection is not required more than once annually. 40 CFR 63.983(b)(2)(i) defines unsafe to inspect as equipment where inspecting personnel would be exposed to imminent or potential danger as a consequence of the inspection. (40 CFR 63.983(b)(2)(ii), 40 CFR 63.998(d)(1)(i))
- The permittee shall maintain a written plan that requires inspection of any closed vent systems which have been determined to be difficult to inspect at least once every 5 years. 40 CFR 63.983(b)(3)(i) defines difficult to inspect as equipment which cannot be inspected without elevating the inspecting more than 2 meters (7 feet) above a support surface. (40 CFR 63.983(b)(3)(ii), 40 CFR 63.998(d)(1)(i))

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~~9. The permittee shall maintain a list of all parts of any closed vent system that are designated as unsafe to inspect or difficult to inspect, with the reasons why they are so designated. (40 CFR 63.998(d)(1)(i))~~

Footnotes:

~~1. This condition is state only enforceable and was established pursuant to Rule 201(1)(b).~~

~~2. This condition is federally enforceable and was established pursuant to Rule 201(1)(a).~~

FGAIFACILITY FLEXIBLE-GROUP CONDITIONS

DESCRIPTION

All process equipment source-wide at the American Process Incorporated Alpena Biorefinery

Emission Units: EULIME, EUPRETREAT, EUYEASTPROP, EUETHANOLFERM, EUBEERCOLUMN, EURECTIFIER, EUMOLSIEVE, EUTANK1, EUTANK3, EUTANK4, and EUETHLOAD

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	7.8 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAIFACILITY	SC-VI.5	R-336.4205(4)
2. PM	0.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAIFACILITY	SC-VI.6	R-336.4205(4)
3. PM10	0.4 tpy ²	12-month rolling time period as determined at the end of each calendar month	FGAIFACILITY	SC-VI.6	R-336.4205(4) R-336.2803 R-336.2804 40 CFR 62.21 (c) & (d)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total ethanol and denaturant throughput	1.17 million gallons per year ²	12-month rolling time period as determined at the end of each calendar month	FGAIFACILITY	SC-VI.7	R-336.4205(4) R-336.4225 R-336.4702(a) R-336.4904 R-336.2803 R-336.2804 40 CFR 62.21 (c) & (d)
2. Denaturant throughput	45,000 gallons per year ²	12-month rolling time period as determined at the end of each calendar month	FGAIFACILITY	SC-VI.7	R-336.4205(4) R-336.4225 R-336.4702(a)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. ~~The permittee shall submit a malfunction abatement plan (MAP) for FGAPIFACILITY to the AQD District Supervisor. The interim MAP and any future revised MAP shall be subject to review and approval, as provided in Rule 911. The permittee shall not operate any equipment in FGAPIFACILITY unless the MAP, revised as necessary according to the procedures of Rule 911, is implemented and maintained. The MAP shall include procedures for maintaining and operating equipment in a satisfactory manner, including procedures for minimizing emissions during malfunction events, and a program for corrective action for such events. If the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the owner or operator shall revise the MAP within 45 days after such an event occurs. (R 336.1225, R 336.1301, R 336.1331, R 336.1702(a), R 336.1910, R 336.1911, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))~~
2. ~~The permittee shall submit an odor management plan (OMP) for FGAPIFACILITY to the AQD District Supervisor. The OMP shall include procedures for maintaining and operating equipment in a manner that minimizes the release of odors to the outside air, and a program for corrective action for such events. If the OMP fails to address or inadequately addresses an event that results in an odor release to the outside air at the time the plan is initially developed, the owner or operator shall revise the OMP within 45 days after such an event occurs. (R 336.1901)~~

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(iii))

1. ~~The permittee shall observe the lime silo vent at least once during each filling operation. Upon observing visible emissions other than water vapor, the permittee shall immediately take corrective actions as specified in the facility Malfunction Abatement Plan. (R 336.1910, R 336.1213(3))~~
2. ~~The permittee shall determine the VOC emission rate from the wet scrubber exhaust and any other process vents using a properly calibrated handheld meter or other method approved by the AQD District Supervisor. (R 336.1213(3))~~

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(iii))

1. ~~All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. (R 336.1205(1), R 336.1225, R 336.1702(a), R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))~~
2. ~~The permittee shall calculate monthly VOC emissions from process vents and transfer operations using emission factors acceptable to the AQD. (R 336.1213(3))~~
3. ~~The permittee shall calculate and keep, in a satisfactory manner, monthly and 12-month rolling time period records of the emissions of VOC and PM from FGAPIFACILITY. The permittee shall keep all records on file and make them available to the AQD upon request. (R 336.1205(1), R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))~~
4. ~~The permittee shall calculate and keep, in a satisfactory manner, monthly and 12-month rolling time period of the emissions of PM10 from FGAPIFACILITY. The permittee shall keep all records on file and make them available to the AQD upon request. (R 336.1205(1), R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))~~

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~~5. The permittee shall keep, in a satisfactory manner, records of the amount of denaturant and of ethanol combined with denaturant shipped from the facility for each month and 12-month rolling time period, as determined at the end of each calendar month. The permittee shall keep all records on file and make them available to the AQD upon request¹. (R 336.1206(1), R 336.1225, R 336.1702(a))~~

VII. REPORTING

- ~~1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (R 336.1213(3)(c)(ii))~~
- ~~2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))~~
- ~~3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (R 336.1213(4)(e))~~

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (Inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹. This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
². This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

Section 2 – American Process Incorporated

ROP No: MI-ROP-B1476-2015a
Expiration Date: December 21, 2020
PTI No: MI-PTI-B1476-2015a

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

APPENDICES

Appendix 1.2 Acronyms and Abbreviations

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	acfm	Actual cubic feet per minute
BACT	Best Available Control Technology	BTU	British Thermal Unit
CAA	Clean Air Act	°C	Degrees Celsius
CAM	Compliance Assurance Monitoring	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	CO _{2e}	Carbon Dioxide Equivalent
CFR	Code of Federal Regulations	dscf	Dry standard cubic foot
COM	Continuous Opacity Monitoring	dscm	Dry standard cubic meter
Department/ department	Michigan Department of Environmental Quality	°F	Degrees Fahrenheit
EU	Emission Unit	gr	Grains
FG	Flexible Group	HAP	Hazardous Air Pollutant
GACS	Gallons of Applied Coating Solids	Hg	Mercury
GC	General Condition	hr	Hour
GHGs	Greenhouse Gases	HP	Horsepower
HVLP	High Volume Low Pressure ⁴	H ₂ S	Hydrogen Sulfide
ID	Identification	kW	Kilowatt
IRSL	Initial Risk Screening Level	lb	Pound
ITSL	Initial Threshold Screening Level	m	Meter
LAER	Lowest Achievable Emission Rate	mg	Milligram
MACT	Maximum Achievable Control Technology	mm	Millimeter
MAERS	Michigan Air Emissions Reporting System	MM	Million
MAP	Malfunction Abatement Plan	MW	Megawatts
MDEQ	Michigan Department of Environmental Quality	NMOC	Non-methane Organic Compounds
MSDS	Material Safety Data Sheet	NO _x	Oxides of Nitrogen
NA	Not Applicable	ng	Nanogram
NAAQS	National Ambient Air Quality Standards	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM ₁₀	Particulate Matter equal to or less than 10 microns in diameter
NSPS	New Source Performance Standards	PM _{2.5}	Particulate Matter equal to or less than 2.5 microns in diameter
NSR	New Source Review	pph	Pounds per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonable Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SNCR	Selective Non-Catalytic Reduction	TAC	Toxic Air Contaminant
SRN	State Registration Number	Temp	Temperature
TEQ	Toxicity Equivalence Quotient	THC	Total Hydrocarbons
USEPA/EPA	United States Environmental Protection Agency	tpy	Tons per year
VE	Visible Emissions	µg	Microgram
		µm	Micrometer or Micron
		VOC	Volatile Organic Compounds
		yr	Year

Appendix 2-2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1419(a)(ii))

Appendix 3-2. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 4-2. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 5-2. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 6-2. Permits to Install

The following table lists any Permit to Install and/or Operate, that relate to the identified emission units or flexible groups as of the effective date of this ROP. This includes all Permits to Install and/or Operate that are hereby incorporated into Source-Wide PTI No. MI-PTI-B1476-2015. PTIs issued after the effective date of this ROP, including amendments or modifications, will be identified in Appendix 6 upon renewal.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
73-10B	API-Alpena Biorefinery	EULIME EUTANK3 EUETHLOAD FGETHANOL FGNSPSVva FGMON EGARIFACILITY

Appendix 7-2. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

Appendix 8-2. Reporting

A. Annual, Semiannual, and Devlation Certification Reporting

The permittee shall use the MDEQ, AQD, Report Certification form (EQP-5736) and MDEQ, AQD, Deviation Report form (EQP-5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting

~~Section of the Source-Wide, Emission Unit and/or Flexible-Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.~~

B. Other Reporting

~~Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible-Group Special Conditions. Therefore, Part B of this appendix is not applicable.~~

Re: PTI 54-20

To be sent upon receipt from Michigan EGLE

Scott Ickes

From: Magirl, Lauren (EGLE) <MagirlL@michigan.gov>
Sent: Wednesday, June 17, 2020 10:02 AM
To: Scott Ickes
Cc: Byrnes, Melissa (EGLE); Mitchell, Mark (EGLE)
Subject: RE: Verbal Approval for Decorative Panels International (54-20)

Good Morning Scott,

I do not have a pdf copy of the permit at this time. We are finalizing the paper work but once I have it I will send it to you.

Thank you,

--
Lauren Magirl

From: Scott Ickes <Scott.Ickes@decpanels.com>
Sent: Wednesday, June 17, 2020 9:26 AM
To: Magirl, Lauren (EGLE) <MagirlL@michigan.gov>
Subject: RE: Verbal Approval for Decorative Panels International (54-20)

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Lauren,

We haven't received our paper copy of the permit at this time. We are in the process of submitting our ROP for renewal. Would you have an electronic copy of the signed PTI? Thanks,

Scott Ickes
Senior Manager, Compliance
Decorative Panels International
Scott.ickes@decpanels.com
989-356-8568
989-464-7381



From: Magirl, Lauren (EGLE) [mailto:MagirlL@michigan.gov]
Sent: Tuesday, June 2, 2020 11:57 AM
To: Scott Ickes
Cc: Mitchell, Mark (EGLE); Byrnes, Melissa (EGLE); Nixon, Shane (EGLE); Radulski, Rebecca (EGLE)
Subject: Verbal Approval for Decorative Panels International (54-20)

This is to inform you that based upon your acceptance of the draft conditions, Permit to Install No. 54-20 for Decorative Panels International, has been approved, effective June 2, 2020.

A paper copy of the approved permit and conditions should be mailed to you within the next few days. The permit will include a signed certificate page and a signed copy of the permit form dated June 2, 2020.

The equipment covered by this permit is also subject to the requirements of the Renewable Operating Permit (ROP) Program. Submittal of an application to modify your ROP may be required prior to commencing operation.

Additional information is available on the [AQD Permits Internet Page](#) or can be obtained by contacting the Gaylord District Office at 989-731-4920.

To help us improve the service we provide our customers, we encourage you to complete a [Permit to Install Customer Service Survey](#).

Please feel free to contact me if you have any questions or concerns about this permit.

Thank you,

Lauren Magirl
Environmental Engineer – Permit Section
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
magirl@Michigan.gov
[Follow Us](#) | Michigan.gov/EGLE

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	EPA-5-16-113(a)-MI-03
)	
Decorative Panels International, Inc. Alpena, Michigan)	Proceeding Under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act, 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1)
)	
<hr/>		

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to Decorative Panels International (DPI) under Sections 113(a)(3) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§ 7413(a)(3) and 7414(a)(1).

Statutory and Regulatory Background

2. Under Section 112 of the CAA, U.S.C. § 7412, on July 30, 2004, EPA promulgated the NESHAP for Plywood and Composite Wood Products (PCWP) at 40 C.F.R. Part 63, Subpart DDDD (69 Fed. Reg. 45983).

3. The NESHAP for PCWP applies to PCWP manufacturing facilities that manufacture hardboard and that are major sources of Hazardous Air Pollutants (HAP). 40 C.F.R. § 63.2231.

4. The NESHAP for PCWP, at 40 C.F.R. § 63.2232, applies to each new, reconstructed, or existing affected source at a PCWP manufacturing facility.

5. The NESHAP for PCWP, at 40 C.F.R. § 63.2240(b), requires owners of an existing affected PCWP manufacturing facility that uses an emission control system to demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 to Subpart DDDD.

6. The NESHAP for PCWP, at 40 C.F.R. Part 63, Subpart DDDD, Table 1B, requires that for each process unit with an add-on control system the owner or operator must comply with one of the following six compliance options:

- (1) Reduce emissions of total HAP, measured as total hydrocarbon (THC) (as carbon), by 90 percent; or
- (2) Limit emissions of total HAP, measured as THC (as carbon), to 20 parts per million volume dry (ppmvd); or
- (3) Reduce methanol emissions by 90 percent; or
- (4) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (5) Reduce formaldehyde emissions by 90 percent; or
- (6) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

7. The NESHAP for PCWP, at 40 C.F.R. Part 63, Subpart DDDD, Table 2, requires that for each biofilter, the owner or operator must either maintain the 24-hour block biofilter bed temperature within the range established according to § 63.2262(m); or maintain the 24-hour block average THC concentration in the biofilter exhaust below the maximum concentration established during the performance test. The NESHAP for PCWP, at 40 C.F.R. § 63.2262(m) describes the establishment of biofilter operating requirements.

8. The NESHAP for PCWP, at 40 C.F.R. Part 63, Subpart DDDD, Table 2, requires that for each catalytic oxidizer, the owner or operator must either maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the

performance test and check the activity level of a representative sample of the catalyst at least every 12 months; or maintain the 3-hour block average THC concentration in the catalytic oxidizer exhaust below the maximum concentration established during the performance test. The NESHAP for PCWP, at 40 C.F.R. §63.2262(l) describes the establishment of catalytic oxidizer operating requirements.

9. The NESHAP for PCWP, at 40 C.F.R. § 63.2271(a) and Part 63, Subpart DDDD, Table 7, requires that for each process using a biofilter, the owner or operator must demonstrate continuous compliance with the compliance options and operating requirements of Table 1B to Subpart DDDD by conducting a repeat performance test using the applicable method(s) specified in Table 4 to Subpart DDDD within 2 years following the previous performance test.

10. The NESHAP for PCWP, at 40 C.F.R. § 63.2290 and Table 10 of Subpart DDDD, states that the NESHAP General Provisions at 40 C.F.R. § 63.6(e)(1-2) applies to Subpart DDDD.

11. The NESHAP for PCWP, at 40 C.F.R. § 63.2250(b), requires the owner or operator to operate and maintain its affected source, including air pollution control and monitoring equipment, according to the provisions in 40 C.F.R. § 63.6(e)(1)(i).

12. On March 16, 1994, EPA promulgated the General Provisions for the Part 63 NESHAP standards at 40 C.F.R. Part 63, Subpart A, § 63.1-63.15 (59 Fed. Reg. 12430).

13. The NESHAP, at 40 C.F.R. § 63.6(e)(1)(i), requires the owner or operator of an affected source to operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

14. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources." Pursuant to Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), on July 21, 1992, EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. 57 Fed. Reg. 32295. These regulations are codified at 40 C.F.R. Part 70.

15. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), states that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate the source except in compliance with its Title V permit.

16. 40 C.F.R. § 70.7(b) states that, no source subject to Title V may operate the source except in compliance with a Title V permit.

17. EPA granted full approval to the Michigan Title V operating permit program on December 4, 2001. 66 Fed. Reg. 62949. The program became effective on November 30, 2001.

18. On December 17, 2009, the Michigan Department of Natural Resources and Environment, now known as the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) issued to DPI the Renewable Operating Permit (ROP) MI-ROP-B1476-2009b. This permit was revised on June 1, 2013, and had an expiration date of December 17, 2014. However, if a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied.

19. On June 12, 2014, MDEQ received DPI's administratively complete renewal application for its Renewable Operating Permit (ROP). On December 21, 2015, MDEQ AQD issued to DPI the ROP MI-ROP-B1476-2015. This ROP is effective until December 21, 2020.

20. Permit MI-ROP-B1476-2009b states that DPI's No. 1 and No. 3 Presses, coolers, and associated equipment, and the Predryer and Bake Oven for the No. 3 press line are subject to the requirements of 40 C.F.R. Part 63, Subpart DDDD.

21. Under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating the NESHAP regulations. The Administrator has delegated this authority to the Director of the Air and Radiation Division.

22. The Administrator of EPA may require any person who owns or operates an emission source to make reports; sample emissions; and provide information required by the Administrator" under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

23. DPI owns and operates a plywood and composite wood products manufacturing facility at 416 Ford Avenue, Alpena, Michigan.

24. At all times relevant to this notice, DPI manufactured hardboard at the manufacturing facility.

25. At all times relevant to this notice, DPI owned and operated two reconstituted wood product presses, known as the No. 1 Press and the No. 3 Press at the manufacturing facility.

26. At all times relevant to this notice, DPI owned and operated a hardboard oven, known as the No. 3 Bake Oven.

27. The No. 1 Press, cooler, and associated equipment are identified in Permit MI-ROP-B1476-2009b as Emission Unit EUPRESS2S. Emissions from EUPRESS2S are controlled by the No. 1 Biofilter.

28. The No. 3 Press and cooler are identified in Permit MI-ROP-B1476-2009b as Emission Unit EU3PRESS-AREA. Emissions from EU3PRESS-AREA are controlled by the No. 3 Biofilter.

29. The No. 3 Bake Oven is identified in Permit MI-ROP-B-1476-2009b as Emission Unit EU3 BAKEOVEN. Emissions from EU3 BAKEOVEN are controlled by the Regenerative Catalytic Oxidizer (RCO).

30. DPI's manufacturing facility is an emission source subject to the requirements of the CAA, including 40 C.F.R. Part 63, Subpart DDDD.

31. DPI's manufacturing facility is located at a major source of HAP emissions as set forth at 40 C.F.R. § 63.2231.

32. DPI's No. 1 and No. 3 Presses and No. 3 Bake Oven are affected sources according to § 63.2232(b).

33. On January 24, 2013, EPA Region 5 sent to DPI a Request for Information under Section 114 of the CAA. DPI received the request on February 4, 2013. On February 12, 2013, EPA sent a revised request.

34. DPI submitted a response to the January 24, 2013 Request for Information and associated revised request to EPA on March 5, 2013.

35. On December 17, 2013, EPA Region 5 sent to DPI another Request for Information under Section 114 of the CAA. DPI received the request on December 23, 2013.

36. DPI submitted a response to the December 17, 2013 Request for Information to EPA on January 17, 2014.

37. On May 29, 2013, DPI conducted compliance testing activities and discovered that the roof panels on the No. 3 Biofilter were leaking due to structural problems with the biofilter top, which interfered with the proper performance of the Biofilter. DPI described these observations in a letter dated July 26, 2013, to Ms. Janis Denman of MDEQ.

38. In its July 26, 2013 letter to Ms. Janis Denman of MDEQ, DPI stated that it was unable to conduct performance testing on its No. 1 and No. 3 Biofilters within two years of its last performance tests conducted August 24-26, 2011 and July 26-28, 2011, respectively.

39. As stated above, DPI conducted performance testing of the No. 1 and No. 3 Biofilters for DDDD compliance on August 24-26, 2011, and July 26-28, 2011, respectively. These tests also established the operating temperature ranges of 73-87°F for the No. 1 Biofilter and 74-91°F for the No. 3 Biofilter.

40. Subsequently, DPI conducted performance testing on both the No. 1 and No. 3 Biofilters on September 17-18, 2015. Results of this testing established a new operating temperature range of 74-92°F for the No. 3 Biofilter for operations occurring on September 18, 2015 or after.

41. DPI conducted a performance test of the RCO on December 7, 2011. Results of this testing established a minimum operating temperature of 818°F for the RCO.

42. On July 31, 2014, January 16, 2015, July 24, 2015, January 21, 2016, July 31, 2016, and January 20, 2017, DPI submitted to MDEQ its semi-annual MACT DDDD compliance reports for the prior 6-month period. In these reports, DPI reported dates of deviations from the established temperature ranges for the No. 1 and No. 3 Biofilters and for the

minimum temperature for the RCO. Additionally, DPI disclosed to EPA a high temperature range deviation for No. 1 Biofilter for February 5, 2017 and April 16, 2017.

43. For the 24-hour block averages/days detailed in Attachment A, the No. 1 Biofilter did not operate within the established temperature range of 73-87°F.

44. For the 24-hour block averages/days detailed in Attachment B, the No. 3 Biofilter did not operate within the established temperature range of 74-91°F (prior to September 18, 2015) or 74-92°F (September 18, 2015 and after).

45. For the days detailed in Attachment C, the temperature of the RCO did not meet the established minimum temperature of 818°F for at least one three-hour block average during that day.

46. DPI owns or operates an "emission source" within the meaning of Section 114 (a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). Therefore, DPI is subject to the requirements of Section 114(a)(1).

47. On April 1, 2014, EPA issued to DPI a Finding of Violation alleging that it violated the NESHAP for PCWP, Subpart DDDD and its Permit MI-ROP-B1476-2009b by failing to maintain the minimum operating temperature for the RCO and to operate within the established temperature ranges for the No. 1 and No. 3 Biofilters, by knowingly operating the No. 3 Biofilter with a leaking or collapsed roof panel from at least May 29, 2013, through at least November 3, 2013, and by failing to conduct repeat performance tests of its No. 1 and No. 3 Biofilters within two years of the previous performance tests.

48. On May 12, 2014, representatives of DPI and EPA discussed the April 1, 2014 Finding of Violation.

49. The Finding of Violation alleged that DPI violated the NESHAP for PCWP at 40 C.F.R. Part 63, Subpart DDDD.

50. DPI performed corrective actions on its No. 1 and No. 3 Biofilters prior to conducting the required performance tests on the biofilters on January 9 (No. 3 Biofilter) and April 11 (No.1 Biofilter), 2014. The January 9, 2014 test demonstrated that the No. 3 Biofilter was operating in compliance with the NESHAP for PCWP standards. The April 11, 2014 test demonstrated that the No. 1 Biofilter was not operating in compliance with the NESHAP for PCWP standards.

51. DPI performed additional corrective actions prior to conducting a repeat performance test on the No. 1 Biofilter on July 17, 2014. Results of that test demonstrated that the No. 1 Biofilter was operating in compliance with the NESHAP for PCWP standards.

52. DPI changed the media of the No. 3 Biofilter on April 23 through 27, 2015. The NESHAP for PCWP requires a performance test within 180 days of a biofilter media changeout. Table 7 to 40 C.F.R. Part 63, Subpart DDDD. DPI conducted performance testing on both the No. 1 and No. 3 Biofilters on September 17-18, 2015. Results of those tests demonstrated that both the No. 1 and No. 3 Biofilters were operating in compliance with the NESHAP for PCWP standards.

Compliance Program

53. By the effective date of this Order, DPI must achieve, demonstrate and maintain compliance with the NESHAP for PCWP, Subpart DDDD, at its Alpena, Michigan facility.

54. Within 30 days of the effective date of this Order, DPI must submit to the MDEQ for review and approval the revised Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) included as Attachment D to this Order.

55. For the duration of this Order, any changes DPI may request to the PM/MAP for provisions related to sorbent tube testing and associated outlet formaldehyde concentrations must be approved in writing by U.S.EPA.

56. If MDEQ approves such changes to the PM/MAP, as described in paragraph 55 above, that new version of the PM/MAP will supersede the attached version, Attachment D.

57. DPI shall submit to EPA a copy of the new version of the PM/MAP within 10 calendar days of MDEQ's approval.

58. DPI will comply with the provisions of the most recently approved PM/MAP, as required by its Permit MI-ROP-B1476-2009b.

59. For the duration of this Order, within 30 calendar days of each calendar quarter's end (March 31, June 30, Sept 30, or December 31) starting September 30, 2017, DPI shall submit to EPA the results of the sorbent tube testing and a description of any corrective actions taken in response to the sorbent tube testing results pursuant to the related provisions in DPI's PM/MAP under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1).

60. For the duration of this Order, DPI shall also submit to EPA the results of any compliance testing, engineering testing, or other stack testing conducted on the RCO or Biofilters within 30 days of DPI's receipt of the test results.

61. DPI must send all reports required by this Order to:

Attention: Compliance Tracker (AE-18J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

General Provisions

62. Respondent admits the jurisdictional allegations in this Administrative Consent Order (Order) and neither admits nor denies the factual allegations in this Order.

63. This Order does not affect DPI's responsibility to comply with other federal, state and local laws.

64. This Order does not restrict EPA's authority to enforce the Michigan SIP, the NESHAP, or any other provision of the CAA.

65. Nothing in this Order limits the EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for DPI's violation of the NESHAP for PCWP, Subpart DDDD. The parties are entering into a Consent Agreement and Final Order contemporaneously with this Order.

66. Failure to comply with this Order may subject DPI to penalties of up to \$45,268 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

67. The terms of this Order are binding on DPI, its assignees and successors. DPI must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice, provided that a transfer of ownership occurs prior to the termination of this Order.

68. DPI may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If DPI fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

69. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, please furnish an electronic copy on physical media such as compact disk, flash drive or other similar item. If it is not possible to submit the information electronically, submit the response to this Order without staples; paper clips and binder clips, however, are acceptable.

70. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

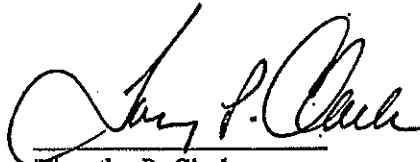
71. DPI agrees to the terms of this Order and will not seek judicial or administrative review of this Order.

72. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate two years from the effective date, provided that DPI has complied with all terms of the Order throughout its duration.

Decorative Panels International, Inc.

31 May 2017


Date



Timothy P. Clark
President and CEO
Decorative Panels International, Inc.

United States Environmental Protection Agency

6/8/17
Date



Edward Nam
Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

Attachment A

Dates on which the No. 1 Biofilter did not maintain a 24-hour block average temperature within the established temperature range of 73-87°F

1/3/2012
1/24/2012
2/9/2012
3/13/2013
3/14/2013
6/15/2013
7/31/2013
1/14/2015
2/24/2015
7/7/2015
7/8/2015
7/15/2015
8/25/2015
8/26/2015
9/5/2015
9/6/2015
9/7/2015
11/19/2015
11/20/2015
11/22/2015
1/6/2016
5/20/2016
6/29/2016
11/15/2016
2/5/2017
4/16/2017

Attachment B

Dates on which the No. 3 Biofilter did not maintain a 24-hour block average temperature within the established temperature range of 74-91°F (prior to September 18, 2015) or 74-92°F (September 18, 2015 and after)

1/1/2012	8/14/2015
1/2/2012	8/16/2015
1/4/2012	8/17/2015
1/5/2012	8/20/2015
1/6/2012	9/5/2015
1/9/2012	9/6/2015
1/10/2012	9/7/2015
1/14/2012	9/8/2015
1/15/2012	11/15/2015
1/16/2012	11/16/2015
1/24/2012	1/10/2016
5/31/2012	3/10/2016
6/1/2012	4/5/2016
9/25/2012	7/24/2016
10/4/2013	8/3/2016
10/5/2013	8/4/2016
10/6/2013	8/11/2016
10/10/2013	8/15/2016
10/19/2013	8/16/2016
10/20/2013	9/7/2016
10/21/2013	12/16/2016
10/22/2013	
10/23/2013	
10/24/2013	
10/25/2013	
10/26/2013	
10/27/2013	
10/28/2013	
10/29/2013	
10/30/2013	
10/31/2013	
11/1/2013	
11/2/2013	
11/3/2013	

Attachment C

Dates on which the RCO did not meet the established minimum temperature of 818°F
for at least one three-hour block average

1/15/2012
1/17/2012
3/7/2012
3/11/2012
3/20/2012
3/16/2015

Attachment D



DPI
DECORATIVE PANELS
INTERNATIONAL

May 26, 2017

Mr. Shane Nixon
MDEQ - Air Quality Division
120 West Chapin St.
Cadillac, MI 49601-2158

Re: Submittal of Revised "Preventative Maintenance, and Malfunction Abatement Plans" Decorative Panels International, Inc. -- Alpena Hardboard Mill

Dear Mr. Nixon:

Yesterday, (May 25, 2017) we received word from US EPA Region 5 that some additional wording that they approved in our most recent revisions to the "Preventative Maintenance, and Malfunction Abatement Plans" for Biofilters #1 and #3 was left out. It was agreed that we would resubmit these two "Preventative Maintenance, and Malfunction Abatement Plans" to the MDEQ, Air Quality Division ("AQD"). In line with this commitment, please find enclosed the newly revised PM/MAPs for your review and approval:

- Preventative Maintenance, and Malfunction Abatement Plan for No. 3 Biofilter (control for the #3 Press and Cooler)
- Preventative Maintenance, and Malfunction Abatement Plans for No. 1 Biofilter (control for #1 Press and Cooler)

The revised PM/MAPs include all the additional wording as requested by the US EPA that was left out of the last submittals and have all other previously suggested changes incorporated; you can consider these the final revised PM/MAPs for which we request your approval.

The proposed revisions to the PM/MAP for both Biofilters is to include sorbent tube quarterly testing for formaldehyde concentration, corrective procedures to address tests that exceed the concentration parameters and language to address delays beyond DPI's control.

If you have any questions regarding the enclosed revised PM/MAPs, please contact me at (989) 356-8532. I would appreciate receiving written confirmation of your approval of the revised PM/MAPs.

Sincerely,

Bob Budnik
Corporate Environmental Manager
Decorative Panels International, Inc.

cc: T. Van Til, Madison Consulting
J. Bowers, Barnes & Thornburg

416 Ford Avenue
Alpena, Michigan 49707
TEL: 989-354-2121
FAX: 989-356-2504
www.decpanels.com

Revised December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Preventative Maintenance and Malfunction Abatement Plan for No. 1 Biofilter (control for the #1 Press and Cooler).

This plan fulfills the requirements in the Renewable Operating Permit, R. 336.1911, and the Startup, Shutdown and Malfunction plan required under the MACT standard (40 CFR 63 Subpart DDDD).

Function: Significantly reduce the odors experienced by the community as a result of odor emissions from the #1 Press and Cooler. Under MACT, monitor and reduce emissions of Hazardous Air Pollutants (as defined in the rule) to 0.3 lb/MSF (3/4") or with one of the six compliance options as provided in Table 1B to Subpart DDDD of Part 63.

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair of air cleaning devices: Manufacturing Manager.

A. Preventative Maintenance Program

Emission Units (Source): FG PRESS and COOLER

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Residue on Press and Cooler	Inspect and burn off residue as needed.	Logbook or log sheet

Air Cleaning Device: No. 1 Biofilter

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Ducts, stacks and exhaust fans	Inspect once/year repair as needed. Clean as necessary.	Logbook or log sheet
Media Condition	Visually inspect two times per year	Logbook or log sheet
Structural Integrity	Visually inspect biofilter annually	Logbook or log sheet
Duct water sprays	Inspect and repair as needed	Logbook or log sheet
Chevron water sprays	Inspect and repair as needed.	Logbook or log sheet
Dynawave water sprays	Inspect and repair as needed.	Logbook or log sheet
Biofilter water spray	Inspect and repair as needed.	Logbook or log sheet
Temperature probe calibration	Quarterly and repair as needed	Logbook or log sheet

Spare parts list for:

Air Cleaning Device: No. 1 Biofilter

1. Installed spare exhaust fan.
2. Installed spare recirculating pump
3. Media on site for one module one month before media change-out, and sufficient media arriving in time to complete change-out of other modules as needed.

Revised December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Emission Units (Source): FG PRESS and COOLER

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Residue on Press and Cooler	See Section A above for press residue	See Section A above for press residue

Air Cleaning Device: No. 1 Biofilter

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Air flow through the biofilter.	Airflow will be maintained to sustain biological growth.	At least one fan will operate at all times in the system except for necessary maintenance work.
Humidifier water flow using line pressure as a surrogate	#1 Biofilter: minimum 500 gpm water flow. This water flow is ensured by maintaining 10 psi line pressure to the humidifier (measured by reverse jet gage).	Flow is read off manual gauge and recorded manually in a log sheet one time per shift during daylight hours. If line pressure is below 10 psi then corrective action will take place and be recorded manually on the daily log.
Press shut-down duct, humidifier, chevron, and bed water flow	Turn off water sprays during a shutdown.	Humidifier flow is recorded manually at the beginning of a shutdown, and after the shutdown is over, humidifier flow is recorded as described in this plan.

Revised December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Media differential pressure	In the No. 1 Biofilter, media shall be maintained to allow for 0.1 inches of pressure drop (water gauge) across the media at start up to approximately 12 inches of pressure drop (water gauge) across the media.	Operation monitored by computer and notations recorded manually two times per shift in logbook. Data trends tracked over time to track media condition and need for change-out. Work requests should be submitted for meters that appear out of normal operational ranges due to weather conditions.
Media temperature	73 F to 87 F	Recorded manually two times per shift on log sheet. Also recorded automatically as 15-min averages.
Outlet concentration of formaldehyde	<2.5 ppm	Measured once per calendar quarter via sorbent tube test and at least 45 days apart

C. Corrective Procedures or Operational Changes to be taken in the event of a malfunction or failure to achieve compliance with the applicable requirements.

Emission Units (Source): FG PRESS and COOLER

Malfunction or Failure	Corrective Procedure
Exhaust fan or recirculating pump failure.	Start the installed spare and commence repairs on the failed unit.
Press fire	An alarm will activate, and press and cooler will be shut down until fire is put out.

Air Cleaning Device: No. 1 Biofilter

Malfunction or Failure	Corrective Procedure
Pressure gauges for air flow or water flow are not operating within the normal range of the operating variable.	Gauges will be tested and repaired/replaced as needed.
Media change-out	The biofilter media will be changed out every 3 to 5 years, or more frequently, if needed, depending on operating performance. Biofilter will be operated with at least 4 of 6 modules during media change-out.

Revised December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Malfunction or Failure	Corrective Procedure
Bed temperature out of range	Adjust steam addition flow.
Outlet formaldehyde concentration above 2.5 ppm per sorbent tube test	<ol style="list-style-type: none"> 1) Review QA/QC and discuss results with lab within 24 hours of receipt of test results 2) Review operating parameters of press and biofilter within 24 hours of receipt of test results 3) Inspect biofilter and sample media for moisture within 7 days of receiving results 4) Repeat sorbent tube test within 2 weeks of receiving results and after taking any necessary corrective actions 5) If second sorbent tube test fails, repeat steps 1.) through 3.), above, and schedule full EPA compliance stack test to be completed as soon as possible, and within 60 days of receiving test results.

If there are delays in the timeframes described above, because completing corrective actions necessary cannot be accomplished within the designated timeframe due to circumstances beyond DPI's control, despite DPI's best efforts to meet the designated timeframe, DPI will document the reasons for the delay, the efforts taken to minimize the delay, and the expected duration of the delay. Examples of circumstances beyond DPI's control include acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond DPI's control. Best efforts to meet the designated timeframe include anticipating any potential delays and addressing the effects of delay as it is occurring.

D. Startup and Shutdown Procedures

1. Startup Procedures

- Mat shall not be processed in the No. 1 (S2S) Press Line unless the exhaust from the press is routed to the biofilter. Biofilter will operate with at least 4 modules when press is operating.
- The biofilter is started by:
 - Turning on water to fill Dynawave tank
 - Start recirculating pump
 - Open caustic valve
 - Start biofilter fans
 - Turn on steam supply (if necessary)

2. Shutdown Procedures

The biofilter is shutdown by reversing the above startup procedures.

Revised December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Preventative Maintenance and Malfunction Abatement Plan for No. 3 Biofilter – (control for the #3 Press and Cooler)

This plan fulfills the requirements in the Renewable Operating Permit R. 336.1911, and the Startup, Shutdown and Malfunction plan required under the MACT standard (40 CFR 63 Subpart DDDD).

Function: Significantly reduce the odors experienced by the community as a result of odor emissions from the #3 Press and Cooler. Under MACT, monitor and reduce emissions of Hazardous Air Pollutants (as defined in the rule) to 0.3 lb/MSF (3/4") or with one of the six compliance options as provided in Table 1B to Subpart DDDD of Part 63.

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair of air cleaning devices: Manufacturing Manager.

A. Preventative Maintenance Program

Emission Units (Source): FG PRESS and COOLER

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Residue on Press and Cooler	Inspect and burn off residue as needed.	Logbook or log sheet

Air Cleaning Device: No. 3 Biofilter

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Ducts, including new horizontal duct cleanout box and stacks and exhaust fans	Inspect once per year and clean as necessary.	Logbook or log sheet
Media Condition	Visually inspect two times per year	Logbook or log sheet
Structural Integrity	Visually inspect biofilter annually	Logbook or log sheet
Water flow	Water flow system in biofilter #3 are inspected and repaired as needed.	Logbook or log sheet

Spare parts list for:

Air Cleaning Device: No. 3 Biofilter

1. Installed spare exhaust fan.
2. Installed spare recirculating pump

Revised December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

3. Media on site for one module one month before media change-out, and sufficient media arriving in time to complete change-out of other modules as needed.

B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Emission Units (Source): FG PRESS and COOLER

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Residue on Press and Cooler	See Section A above for press residue	See Section A above for press residue

Air Cleaning Device: No. 3 Biofilter

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Air flow through the biofilter.	Airflow will be maintained to sustain biological growth.	At least one fan will operate at all times in the system except for necessary maintenance work. Log book or log sheet
Humidifier water flow	Maintain a minimum 200 gpm water flow.	Flow is measured by a flow meter and recorded manually 2 times per shift. If flow drops below 200 gpm then corrective action shall be taken and recorded manually on the daily log.
Press shut-down Humidifier water flow	Turn off water supply to beds during shutdown.	Flow is recorded manually at the beginning of a shutdown, and after the shutdown is over, flow is recorded as described in this plan.

Revised December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Media differential pressure	In the No. 3 Biofilter, media shall be maintained to allow for 0.1 inches of pressure drop (water gauge) across the media at start up to approximately 5.5 inches of pressure differential (water gauge) across the media. Note readings are in negative units.	Operation monitored by computer and notations recorded manually two times per shift in logbook. Data trends assessed over time to track media condition and need for change out.
Media temperature	74 F to 92 F.	Recorded manually two times per shift on log sheet. Also recorded automatically as 15-min averages.
Outlet concentration of formaldehyde	<1.5 ppm	Measured once per calendar quarter via sorbent tube test and at least 45 days apart

C. Corrective Procedures or Operational Changes to be taken in the event of a malfunction or failure to achieve compliance with applicable requirements.

Emission Units (Source): FG PRESS and COOLER LINES

Malfunction or Failure	Corrective Procedure
Exhaust fan or recirculating pump failure.	Start the installed spare and commence repairs on the failed unit.
Press fire	An alarm will activate, and press/ cooler will be shut down until fire is put out.

Air Cleaning Device: No. 3 Biofilter

Malfunction or Failure	Corrective Procedure
Pressure gauges for air flow or water flow are not operating within the normal range of the operating variable.	Alarms sound, and gages will be tested and repaired/replaced as needed.
Media change-out	The biofilter media will be changed out every 3 to 5 years, or more frequently if needed, depending on operating performance. Biofilter will be operated with at least 3 of 4 modules during media change-out.

Revised December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Malfunction or Failure	Corrective Procedure
Bed temperature out of range	Adjust steam addition flow.
Outlet formaldehyde concentration above 1.5 ppm per sorbent tube test	<ol style="list-style-type: none"> 1) Review QA/QC and discuss results with lab within 24 hours of receipt of test results 2) Review operating parameters of press and biofilter within 24 hours of receipt of test results 3) Inspect biofilter and sample media for moisture within 7 days of receiving results 4) Repeat sorbent tube test within 2 weeks of receiving results and after taking any necessary corrective actions 5) If second sorbent tube test fails, repeat steps 1.) through 3.), above, and schedule full EPA compliance stack test to be completed as soon as possible, and within 60 days of receiving test results.

If there are delays in the timeframes described above, because completing corrective actions necessary cannot be accomplished within the designated timeframe due to circumstances beyond DPI's control, despite DPI's best efforts to meet the designated timeframe, DPI will document the reasons for the delay, the efforts taken to minimize the delay, and the expected duration of the delay. Examples of circumstances beyond DPI's control include acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond DPI's control. Best efforts to meet the designated timeframe include anticipating any potential delays and addressing the effects of delay as it is occurring.

D. Startup and Shutdown Procedures

1. Startup Procedures

- Mat shall not be processed in the No. 3 Press Line unless the exhaust from the press is routed to the biofilter.
- The biofilter is started by:
 - Start recirculating pump for humidifier (fill tank if necessary)
 - Start biofilter fans
 - Turn on steam supply (if necessary)
 - Open valves for water spraying (if necessary)
 - Open caustic valve to maintain pH in humidifier water

2. Shutdown Procedures

The biofilter is shutdown by reversing the above startup procedures.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-MI-03, by certified mail, return receipt requested, to:

Timothy P. Clark
VP Operations/CFO
Decorative Panels International, Inc.
416 Ford Avenue
Alpena, Michigan 49707

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-MI-03, by first-class mail to:

Charlie Denton
Barnes and Thornburg
171 Monroe Avenue N.W.
Suite 1000
Grand Rapids, MI 49503-2694

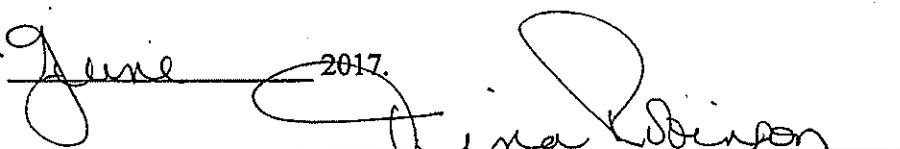
I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-MI-03, via e-mail to:

Tom Hess
Enforcement Unit Manager, Air Quality Division
Michigan Department of Environmental Quality
HESST@michigan.gov

and

Shane Nixon
Cadillac/Gaylord District Supervisor
Michigan Department of Environmental Quality
nixons@michigan.gov

On the 14th day of June 2017.


Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

7009 1680 0000 7647 0186

Revised October 2019 December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Preventative Maintenance and Malfunction Abatement Plan for No. 1 Biofilter (control for the #1 Press and Cooler).

This plan fulfills the requirements in the Renewable Operating Permit, R. 336.1911, and the Startup, Shutdown and Malfunction plan required under the MACT standard (40 CFR 63 Subpart DDDD).

Function: Significantly reduce the odors experienced by the community as a result of odor emissions from the #1 Press and Cooler. Under MACT, monitor and reduce emissions of Hazardous Air Pollutants (as defined in the rule) to 0.3 lb/MSF (3/4") or with one of the six compliance options as provided in Table 1B to Subpart DDDD of Part 63.

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair of air cleaning devices: Manufacturing Manager.

A. Preventative Maintenance Program

Emission Units (Source): FG PRESS and COOLER

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Residue on Press and Cooler	Inspect and burn off residue as needed.	Logbook or log sheet

Air Cleaning Device: No. 1 Biofilter

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Ducts, stacks and exhaust fans	Inspect once/year repair as needed. Clean as necessary.	Logbook or log sheet
Media Condition	Visually inspect two times per year	Logbook or log sheet
Structural Integrity	Visually inspect biofilter annually	Logbook or log sheet
Duct water sprays	Inspect and repair as needed	Logbook or log sheet
Chevron water sprays	Inspect and repair as needed.	Logbook or log sheet
Dynawave water sprays	Inspect and repair as needed.	Logbook or log sheet
Biofilter water spray	Inspect and repair as needed.	Logbook or log sheet
Temperature probe calibration	Quarterly and repair as needed	Logbook or log sheet

Spare parts list for:

Air Cleaning Device: No. 1 Biofilter

1. Installed spare exhaust fan.
2. Installed spare recirculating pump
3. Media on site for one module one month before media change-out, and sufficient media arriving in time to complete change-out of other modules as needed.

Revised October 2019 December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Emission Units (Source): FG PRESS and COOLER

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Residue on Press and Cooler	See Section A above for press residue	See Section A above for press residue

Air Cleaning Device: No. 1 Biofilter

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Air flow through the biofilter.	Airflow will be maintained to sustain biological growth.	At least one fan will operate at all times in the system except for necessary maintenance work.
Humidifier water flow using line pressure as a surrogate	#1 Biofilter: minimum 500 gpm water flow. This water flow is ensured by maintaining 10 psi line pressure to the humidifier (measured by reverse jet gage).	Flow is read off manual gauge and recorded manually in a log sheet one time per shift during daylight hours. If line pressure is below 10 psi then corrective action will take place and be recorded manually on the daily log.
Press shut-down duct, humidifier, chevron, and bed water flow	Turn off water sprays during a shutdown.	Humidifier flow is recorded manually at the beginning of a shutdown, and after the shutdown is over, humidifier flow is recorded as described in this plan.

Revised October 2019 December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Media differential pressure	In the No. 1 Biofilter, media shall be maintained to allow for 0.1 inches of pressure drop (water gauge) across the media at start up to approximately 12 inches of pressure drop (water gauge) across the media.	Operation monitored by computer and notations recorded manually two times per shift in logbook. Data trends tracked over time to track media condition and need for change-out. Work requests should be submitted for meters that appear out of normal operational ranges due to weather conditions.
Media temperature	73 F to 95 F	Recorded manually two times per shift on log sheet. Also recorded automatically as 15-min averages.
Outlet concentration of formaldehyde	<2.5 ppm	Measured once per calendar quarter via sorbent tube test and at least 45 days apart

C. Corrective Procedures or Operational Changes to be taken in the event of a malfunction or failure to achieve compliance with the applicable requirements.

Emission Units (Source): FG PRESS and COOLER

Malfunction or Failure	Corrective Procedure
Exhaust fan or recirculating pump failure.	Start the installed spare and commence repairs on the failed unit.
Press fire	An alarm will activate, and press and cooler will be shut down until fire is put out.

Air Cleaning Device: No. 1 Biofilter

Malfunction or Failure	Corrective Procedure
Pressure gauges for air flow or water flow are not operating within the normal range of the operating variable.	Gauges will be tested and repaired/replaced as needed.
Media change-out	The biofilter media will be changed out every 3 to 5 years, or more frequently, if needed, depending on operating performance. Biofilter will be operated with at least 4 of 6 modules during media change-out.

Revised October 2019 December 2016, August 2016, Revised September 2014, Revised September 2011, January, 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Malfunction or Failure	Corrective Procedure
Bed temperature out of range	Adjust steam addition flow.
Outlet formaldehyde concentration above 2.5 ppm per sorbent tube test	<ol style="list-style-type: none"> 1) Review QA/QC and discuss results with lab within 24 hours of receipt of test results 2) Review operating parameters of press and biofilter within 24 hours of receipt of test results 3) Inspect biofilter and sample media for moisture within 7 days of receiving results 4) Repeat sorbent tube test within 2 weeks of receiving results and after taking any necessary corrective actions 5) If second sorbent tube test fails, repeat steps 1.) through 3.), above, and schedule full EPA compliance stack test to be completed as soon as possible, and within 60 days of receiving test results.

If there are delays in the timeframes described above, because completing corrective actions necessary, due to circumstances beyond DPI's control, despite DPI's best efforts to meet the designated timeline, DPI will document the reasons for the delay, the efforts taken to minimize the delay, and the expected duration of the delay. Examples of circumstances beyond DPI's control include acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond DPI's control. Best efforts to meet the designated timeframe include anticipating any potential delays and addressing the effects of delay as it is occurring.

D. Startup and Shutdown Procedures

1. Startup Procedures

- Mat shall not be processed in the No. 1 (S2S) Press Line unless the exhaust from the press is routed to the biofilter. Biofilter will operate with at least 4 modules when press is operating.
- The biofilter is started by:
 - Turning on water to fill Dynawave tank
 - Start recirculating pump
 - Open caustic valve
 - Start biofilter fans
 - Turn on steam supply (if necessary)

2. Shutdown Procedures

The biofilter is shutdown by reversing the above startup procedures.

Revised December 2018 December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Preventative Maintenance and Malfunction Abatement Plan for No. 3 Biofilter – (control for the #3 Press and Cooler)

This plan fulfills the requirements in the Renewable Operating Permit R. 336.1911, and the Startup, Shutdown and Malfunction plan required under the MACT standard (40 CFR 63 Subpart DDDD).

Function: Significantly reduce the odors experienced by the community as a result of odor emissions from the #3 Press and Cooler. Under MACT, monitor and reduce emissions of Hazardous Air Pollutants (as defined in the rule) to 0.3 lb/MSF (3/4") or with one of the six compliance options as provided in Table 1B to Subpart DDDD of Part 63.

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair of air cleaning devices: Manufacturing Manager.

A. Preventative Maintenance Program

Emission Units (Source): FG PRESS and COOLER

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Residue on Press and Cooler	Inspect and burn off residue as needed.	Logbook or log sheet

Air Cleaning Device: No. 3 Biofilter

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Ducts, including new horizontal duct cleanout box and stacks and exhaust fans	Inspect once per year and clean as necessary.	Logbook or log sheet
Media Condition	Visually inspect two times per year	Logbook or log sheet
Structural Integrity	Visually inspect biofilter annually	Logbook or log sheet
Water flow	Water flow system in biofilter #3 are inspected and repaired as needed.	Logbook or log sheet

Spare parts list for:

Air Cleaning Device: No. 3 Biofilter

1. Installed spare exhaust fan.
2. Installed spare recirculating pump
3. Media on site for one module one month before media change-out, and sufficient media arriving in time to complete change-out of other modules as needed.

4. Steam controller

B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Emission Units (Source): FG PRESS and COOLER

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Residue on Press and Cooler	See Section A above for press residue	See Section A above for press residue

Air Cleaning Device: No. 3 Biofilter

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Air flow through the biofilter.	Airflow will be maintained to sustain biological growth.	At least one fan will operate at all times in the system except for necessary maintenance work. Log book or log sheet
Humidifier water flow	Maintain a minimum 200 gpm water flow.	Flow is measured by a flow meter and recorded manually 2 times per shift. If flow drops below 200 gpm then corrective action shall be taken and recorded manually on the daily log.
Press shut-down Humidifier water flow	Turn off water supply to beds during shutdown.	Flow is recorded manually at the beginning of a shutdown, and after the shutdown is over, flow is recorded as described in this plan.

Revised December 2018 December 2016, August 2016, Revised September 2011, January 2011, Revised August 2010, Revised September 19, 2008, Revised July 10, 2006, Revised January 26, 2004, October 19, 2004, Final December 1, 2003

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Media differential pressure	In the No. 3 Biofilter, media shall be maintained to allow for 0.1 inches of pressure drop (water gauge) across the media at start up to approximately 5.5 inches of pressure differential (water gauge) across the media. Note readings are in negative units.	Operation monitored by computer and notations recorded manually two times per shift in logbook. Data trends assessed over time to track media condition and need for change out.
Media temperature	74 F to 97 F.	Recorded manually two times per shift on log sheet. Also recorded automatically as 15-min averages.
Outlet concentration of formaldehyde	<1.5 ppm	Measured once per calendar quarter via sorbent tube test and at least 45 days apart

C. Corrective Procedures or Operational Changes to be taken in the event of a malfunction or failure to achieve compliance with applicable requirements.

Emission Units (Source): FG PRESS and COOLER LINES

Malfunction or Failure	Corrective Procedure
Exhaust fan or recirculating pump failure.	Start the installed spare and commence repairs on the failed unit.
Press fire	An alarm will activate, and press/.cooler will be shut down until fire is put out.

Air Cleaning Device: No. 3 Biofilter

Malfunction or Failure	Corrective Procedure
Pressure gauges for air flow or water flow are not operating within the normal range of the operating variable.	Alarms sound, and gages will be tested and repaired/replaced as needed.
Media change-out	The biofilter media will be changed out every 3 to 5 years, or more frequently if needed, depending on operating performance. Biofilter will be operated with at least 3 of 4 modules during media change-out.

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Malfunction or Failure	Corrective Procedure
Bed temperature out of range	Adjust steam addition flow.
Outlet formaldehyde concentration above 1.5 ppm per sorbent tube test	<ol style="list-style-type: none"> 1) Review QA/QC and discuss results with lab within 24 hours of receipt of test results 2) Review operating parameters of press and biofilter within 24 hours of receipt of test results 3) Inspect biofilter and sample media for moisture within 7 days of receiving results 4) Repeat sorbent tube test within 2 weeks of receiving results and after taking any necessary corrective actions 5) If second sorbent tube test fails, repeat steps 1.) through 3.), above, and schedule full EPA compliance stack test to be completed as soon as possible, and within 60 days of receiving test results.

If there are delays in the timeframes described above, because completing corrective actions necessary requires more time, or due to circumstances beyond DPI's reasonable control despite DPI's best efforts to meet the designated timeline, DPI will document the reasons for the delay, and the efforts taken to minimize the delay, and the expected duration of the delay. **Examples of circumstances beyond DPI's control include acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond DPI's control.** Circumstances beyond DPI's control do not include DPI's financial inability to meet the designated timeframes. Best efforts to meet the designated timeframe include anticipating any potential delays and addressing effects of delay as it is occurring.

D. Startup and Shutdown Procedures

1. Startup Procedures

- **Mat shall not be processed in the No. 3 Press Line unless the exhaust from the press is routed to the biofilter.**
- **The biofilter is started by:**
 - **Start recirculating pump for humidifier (fill tank if necessary)**
 - **Start biofilter fans**
 - **Turn on steam supply (if necessary)**
 - **Open valves for water spraying (if necessary)**
 - **Open caustic valve to maintain pH in humidifier water**

2. Shutdown Procedures

The biofilter is shutdown by reversing the above startup procedures.

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 Revised September 19, 2008, Revised January 22, 2008
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**Preventative Maintenance and Malfunction Abatement Plan-for
 Regenerative Catalytic Oxidizer (“RCO”) – (control for the No. 3
 Predryer and No. 3 Bake Oven) and Startup/Shutdown Plan**

This plan fulfills the requirements in the Renewable Operating Permit and the Startup, Shutdown and Malfunction Abatement plan required under MACT standard found in 40 CFR 63 Subpart DDDD.

Function: Significantly reduce the odors experienced by the community as a result of odor emissions from the No. 3 Predryer and No. 3 Bake Oven. Under MACT, reduce emissions of Hazardous Air Pollutants (defined in the rule) from No. 3 Bake Oven to allowed level of 0.022 lb/MSF (1/8”).

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair of air cleaning devices: Hardboard Superintendent.

A. Preventative Maintenance Program

Air Cleaning Device: RCO

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Ducts and stacks	Inspect annually or during outages as operations indicate problems	Log book or log sheet
Media Condition and change out	Inspect annually	Annual inspection report – Engineering office
RCO system bakeout	When prefilter backpressure (water column) reaches 6”.	Bakeouts are recorded (by temperature) on the chart recorder or MAP press log sheet.

Spare parts list for

Air Cleaning Device: RCO

1. Installed spare lube pump.
2. Installed spare hydraulic pump.
3. Electronic flame detector.

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Revised October 19, 2004
Final December 1, 2003

B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Air Cleaning Device: RCO

Operating Variable to be monitored	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Prefilter pressure drop (dP)	Less than 6 inches W.C. (i.e. the pressure drop is less than - 6.0 on sensor PT 1912)	Visual inspection of gauge reading is recorded manually 2 times per shift in a MAP #3 Biofilter and RCO log sheet.
Combustion Chamber Temperature	Greater than or equal to 818 degrees Fahrenheit	Continuously monitored by a thermocouple. Reading is recorded manually 2 times per shift on MAP #3 Biofilter and RCO log sheet. A circular temperature chart recorder is operated for informational purposes, only.

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C. Corrective Procedures or Operational Changes taken in the event of a malfunction or failure to achieve compliance with applicable requirements.

Emission Units (Source): No. 3 PREDRYER, No. 3 BAKE OVEN

Malfunction or Failure	Corrective Procedure
Fire in Predryer or Bakeoven	The fire system automatically activates. The No. 3 Predryer and No. 3 Bakeoven are shut down until fire is put out. The RCO fan remains on until the exhaust gas temperature drops below 180 degrees F.

Air Cleaning Device: RCO

Malfunction or Failure	Corrective Procedure
Lube or hydraulic pump or fan failure.	Start the installation of spare and commence repairs on the failed unit.
>6 inch prefilter pressure drop (dP).	A bakeout will be performed during the next process down time.
Combustion Chamber Temperature fails to maintain 818 degrees Fahrenheit	An alarm displays on the control panel. If RCO fails to maintain temperature at or near 818° F for a period in excess of two consecutive hours press & cooler are shut down until repairs are made.

D. Startup/Shutdown Plan for RCO serving Bake Oven #3 and #3 Predryer

1. Startup Procedures

- Board shall not be processed in the #3 line (including predryer and bake oven) unless the RCO is operating and up to temperature. The RCO shall be started and fully operational prior to introducing mat into #3 predryer. This assures minimal emissions from the process.
- The RCO is started in the off-line position by initiating autostart. The fan and burner startup procedures are all programmed and automatic.
- Once the set temperature is reached on the RCO, then the selector switch is set to 'on line' and the #3 line production may begin.

2. Shutdown procedures

- The press line shall be shut down (no board going through) prior to shutting down the RCO
-
- There is a slight variation in shutdown procedures depending on the season due to cold weather concerns in the winter
- Summer shutdown:
 - Shut off RCO burner
 - Shut off main exhaust fan when chamber temp reaches 400 F or less
 - Maintain combustion fan operation for 24 hours after shutdown
 - Shut down all other fans, including process vent fans
- Winter Shutdown (as necessary to prevent freezing):
 - Perform a bakeout of the RCO
 - Set the RCO temperature at 519 F and leave RCO on line.
 - Maintain operation of all fans
 - Maintain #4 gas burner in predryer and #3 zone in bake oven, shut down all other burners

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Boiler #3 (EUBoiler#3) Preventative Maintenance, and Malfunction Abatement Plan, BOILER No. 3; Startup and Shutdown Plan

Responsible supervisory personnel for overseeing the inspection, maintenance, and repair programs of air-cleaning devices; and for approval of non-routine repairs: Power Plant Superintendent.

Responsible supervisory personnel for on-going maintenance and repair of air-cleaning devices: Shift Engineer.

Responsible supervisory personnel for overseeing regular inspections: Shift Engineer, and Boiler Operator.

Responsible supervisory personnel for overseeing non-routine repair: Power Plant Superintendent.

A. Preventative Maintenance Program

Emission Units (Source): EUBOILER#3

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Grates for cracks and integrity	Once per year during scheduled outages	Log record
Front and rear air seals	Once per year during scheduled outages	Log record
Gas flues	Once per year during scheduled outages	Log record
Furnace casing and ductwork (except stacks)	Once per year during scheduled outages	Log record
Clean steam generator tubes, gas passages, economizers, and No. 3 Boiler air preheater	Once per year during scheduled outages	Log record
Calibrate Steam flow meters and recorders	Every 12 months, or sooner if cross checking with other instruments indicates a discrepancy	Log record
Calibrate Combustion controls relating to gas temperature, air pressures, system drafts, steam pressure controls, steam flow/air flow ratio controllers	Every 12 months, or sooner if cross checking with other instruments indicates a discrepancy	Log record
Opacity meter auto zero/span calibration	Daily	Log record
Opacity Filter audit	quarterly	Log record, report
Opacity Monitor zero alignment	Annual	Contractor report
O2 monitor/excess air.	Calibrate every quarter	Log record
Boiler water "eye" glass gauges	Inspect and blow down weekly	Log record

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Air Cleaning Device: Multiclones (EUBOILER#3)

Item to be inspected	Frequency of Inspections or repairs	Recordkeeping Method
Candling on hoppers and access doors	Quarterly	Log record
Candling on expansion joints	Quarterly	Log record
Dust valve seals	At least annually when boiler is off-line	Log record
Collecting tube gaskets	At least annually when boiler is off-line	Log record
Internal tube sheets	At least annually when boiler is off-line	Log record
Spinner vanes and visual checks for tube perforations or erosion	At least annually when boiler is off-line	Log record
Bottoms of cones for evidence of erosion	At least annually when boiler is off-line, using visual observation	Log record

Air Cleaning Device: ESP

Item to be Inspected	Frequency of Inspections or repairs	Recordkeeping Method
Plates	At least annually while boilers are off-line	Log record
Vibrators/rappers	At least annually while boilers are off-line	Log record
Inspect/Clean insulators and electrical connections	At least annually when boilers are off-line	Log record
Ash removal system	Daily on regular rounds	Log record

SPARE PARTS LISTS (on-hand or on-order)

Emission Units (Source): EUBOILER#3

(10) grate bars

Air Cleaning Device: Multiclones for EUBOILER#3

6 Cones
 25 Cone gaskets
 12 Tri-cones
 12 Spinner Vanes

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Air Cleaning Device: ESP

<u>Suggested Spare Quantity</u>	<u>Unit Item Description</u>
1	Insulator, Support
1	Insulator, Feed Through
1	Insulator, Vibrator
1	Gasket Set, Support Insulator
1	GVC Optimizer Board
1	AC Switch Assembly
1	GVC Display Head With Cable
1	Rapper Link Module
1	Thyristor Board
1	Rapper Coil
3	Rapper Main Capacitor
1	Vibrator, Discharge Electrode
3	Vibrator, Diode
1	Vibrator Surge Suppressor
1	Purge Air Motor
8	Purge Air Filter
7	Key Interlock, Keys (A1,B1,A2,B2,3-C1)
8	Gasket, Manway
1	Level Detector

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B. Emission Unit (Source) and Air Cleaning Device Operating Variables to be Monitored

Emission Units (Source): EUBOILER#3

Operating Variable	Normal Range of the Operating Variable	Frequency & method of monitoring and type of record keeping
Draft controllers and outlet dampers	-0.10 inches to -0.20 inches	Daily by shift Visual inspections Log record
Boiler Control inspections	Per power plant equipment or superintendent instructions	Inspect semi-annually or as needed. Adjust/repair as needed. Record inspection & repairs.
Opacity levels	<10% on a daily block average; 20% on a 6-minute average	Continuous readings by COMs, hardcopy daily reports
O2 level	>level established during most recent compliance test for CO (lowest hourly average); 30-day average	Data recorded at least every 15 minutes and averaged to 30-day rolling
Operating load	<110% of load established during most recent compliance test for CO (hourly average); 30-day average	Data recorded at least every 15 minutes, hourly operating load and averaged to 30-day rolling
O2 and operating load datalogger	Power on and recording on	Daily check, log record

Air Cleaning Device: Multiclones (EUBOILER#3)

Operating Variable to be Monitored	Normal Range of the Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Differential pressure drop across mechanical collectors as measured at the economizer and the ID fan suction. Difference between economizer and I.D. fan suction	>2.5 inches w.g.	Checked every 2 hours, and recorded.

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Air Cleaning Device: ESP

Operating Variable to be Monitored	Normal Range of Operating Variable	Frequency & method of monitoring malfunction and type of record keeping
Voltage and current to Primary and Secondary Transformer/Rectifier (T/R)	Primary T/R: 25-50 kilovolts (KV); 45-325 milliamps Secondary T/R: 30-55 kilovolts; 75-650 milliamps	Continuous readout, recordkeeping by recording on log sheets every 2 hours.

C. Corrective Procedures or Operational Changes that shall be taken in the event of a malfunction or failure to achieve compliance with the applicable emission limits or operating limit.

Emission Units (Source): EUBOILER#3

Malfunction or Failure	Corrective Procedure
Stack opacity exceeds 20 percent during operational upsets (6-minute average) or 10% on a daily block average	Notify the mill and keep communications open with mill personnel. Check boiler excess air and adjust if needed, reduce load and bark to stabilize upset conditions and opacity. Once opacity is stabilized return fuel and air to normal operational conditions.
Stack opacity exceeds 20 percent because of a natural gas burner trip.	Notify the mill immediately of the natural gas burner trip and keep communications open with mill personnel. Re-light the gas burner using the standard light-off procedure Commence steam load shedding within 30 minutes of loss of natural gas burner(s). Steam load shedding shall be completed in accordance with the Shutdown Procedures in the Start up and Shut Down Plan below.
Opacity monitor malfunction (not recording, failed daily cal)	Reduce potential for emissions by adjusting fuel blend. Contact maintenance if powerhouse is unable to make corrective measures. If malfunction cannot be corrected contact outside vendor to correct the malfunction. If monitor is not available because of a malfunction, opacity will be read and recorded by certified smoke reader until monitor returns to full service.
Flue gas oxygen monitor fails to calibrate	Maintenance called to repair/replace components as necessary to pass calibration
Oxygen and load datalogger fails to record	Repower datalogger; download data, contact vendor.

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Air Cleaning Device: Multiclones (EUBOILER#3)

Malfunction or Failure	Corrective Procedure
Differential pressure drop below the typical minimums, and opacity exceeds 20 percent.	The boiler will be taken off-line until problems are identified and repairs completed.

Air Cleaning Device: ESP

Malfunction or Failure	Corrective Procedure
Loss of power to fields, voltage or current out of range for T/Rs and opacity exceeds 20% on a 6-minute average or 10% on a daily block	Reduce load and/or increase natural gas to #3 until problem is identified and repairs completed.

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Boiler #3 Start Up and Shut Down Plan

A. STARTUP PROCEDURES

- Prior to the introduction of fuel into the boiler, the following checks are made by the boiler operator and shift engineer via physical inspection and/or confirmed by the control system:
 1. All lockout/tagouts have been removed and all manways are closed.
 2. The fans, valves, gas burner, bark feed, grate systems, sonic air horns and controls are operational.
 3. There is proper water level in the steam drum.
 4. All vents are open.
- The induced draft (ID) fan is started up to purge the boiler. Simultaneously the continuous opacity monitoring system is started. The operator confirms that the continuous opacity monitor is operational as indicated on the control panel and the data is recorded before any fuel is fed to the boiler.
- The natural gas burner is started to gradually warm up the boiler. Only natural gas is fired in the boiler until the steam pressure reaches approximately 300 psig and the steam flow is approximately 20,000 lb/hr. This process typically takes from 3-4 hours, depending on whether it is a "cold" start (i.e., the boiler has been down for days) or a "warm" start (i.e., the boiler has been down for minutes or hours).
- ESP is turned on (ESP may be turned on before natural gas firing, but will always be on prior to using wood fuel in the boiler)
- Wood is gradually introduced into the firebox. Clarifier oil and/or used oil may be mixed with the wood in the day fuel pile. Pellets of dust/sludge may be added to the apron conveyor prior to final fuel feed conveyor.

B. PLANNED BOILER SHUTDOWN PROCEDURES

The following procedures are used to shutdown the boiler for planned outages, and is to be followed as close as possible during an unplanned shutdown.

- Wood (and pellet) feed to the boiler is stopped and the grates are cleared once the steam flow drops to approximately 15,000 lb/hr.
- Natural gas firing may continue until steam demand ceases. Steam drum vent is opened after steam pressure drops to 25 psig.
- ESP may be turned off after combustion ceases in the boiler as confirmed by visual inspection
- The fans continue to operate to cool the boiler until the temperature as measured at the economizer reaches 212 degrees F.