DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B730233817

FACILITY: WEYERHAEUSER NR COMPANY		**SRN / ID:** B7302
LOCATION: 4111 W FOUR MILE RD, GRAYLING		**DISTRICT:** Gaylord
CITY: GRAYLING		**COUNTY:** CRAWFORD
CONTACT: Faith Dandois , Environmental Health and safety Coordinator		**ACTIVITY DATE:** 03/01/2016
STAFF: Gloria Torello	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: 2016 FCE.		
RESOLVED COMPLAINTS:		

Directions: The facility is located in Grayling, Crawford County. From I75 take the Four Mile Road exit. Turn east onto Four Mile Road and travel approximately one mile, the facility is on the south side of the road. AQD staff must pass through the guarded gate.

Facility: The Weyerhaeuser Company manufactures oriented strand board (OSB) panels commonly used as construction material.

Permit. This is a Title V facility. AQD staff inspected the facility on January 21, 3016, March 1, 2016, and spoke via telephone with Kathi Moss and Faith Dandois of Weyerhaeuser staff on various occasions for this FCE. On March 8, 2016 the AQD issued the renewal MI-ROP-B7302-2016. The renewal ROP changes included:

- Source-Wide, the CO_2e limit was removed with the approval of PTI 13-15 on 2/29/15.
- EUBLENDVENT, this EU was removed as an individual table with the approval of PTI 140-14. EUBLENDVENT baghouse became an EU within FGWOODHANDLING.
- FGDIESEL-ENGINE, the SO2 emission limit was removed. Per a conversation with Rob Dickman, AQD, Rob recalled the SO2 limit was removed because it was redundant with the Material Limit on diesel fuel.

The site inspections and records reviewed were based on the conditions from the MI-ROP-B7302-2016. The ROP expires on March 8, 2021. An administratively complete ROP renewal application is due to the AQD between September 8, 2019 and September 8, 2020.

Malfunction Abatement Plan (MAP), or Startup, Shutdown, or Malfunction Plan (SSMP):
The ROP requires MAPs under AQD's Rule 911 or a SSMPs under federal 40 CFR Part 63 Subpart DDDD as follows:

ROP Page Numbers and Conditions Requiring a MAP or SSMP	Is a MAP or SSMP needed?	Does AQD have a plan on file?	Was Plan Approved by AQD?	Does Plan need updating?
Page 18, EUPRESSLINE VI.9, MAP.	MAP	Yes	No	Yes
Page 19, EUPRESSLINE, VII.5, SSMP	SSMP	Yes		
Page 20, EUPRESSLINE IX. SSMP.	SSMP	Yes		
Page 21, EUPAINTBOOTH, III.2, MAP.	MAP	Yes		
Page 23, EUIBW, III.1, MAP.	MAP	Yes		
Page 27, EUCOEN, III.2, MAP.	MAP	Yes		
Page 36, FGDRYERS, VI.9, MAP.	MAP	Yes		
Page 36, FGDRYERS, VI.11, MAP.				

Page 38, FGDRYERS, VII.11, SSMP.	SSMP	Yes		
Page 39, FGDRYERS, IX.1, SSMP.				
S/AQD/Gloria/a 2016 SI/B7302 MAP SSMP				

There is a Startup, Shutdown, and Malfunction Abatement Plan (SSMAP) dated June 3, 2015 on file with AQD. There is not an AQD approval letter in the file. On June 20, 2016 Torello and Ms. Moss reviewed the SSMAP. The SSMAP combines the SSMP and the MAP. There is no objection to combining the SSMP and MAP into one SSMAP. An updated SSMAP will follow based upon Torello's and Ms. Moss' discussion. The SSMAP will include Boiler MACT items.

MAERS: The 2016 MAERS attachments needed to be updated. Ms. Moss sent in the updates. On June 20, 2016 AQD staff and Ms. Moss spoke about the updated attachments. Torello forwarded the updates to Dennis McGeen, AQD Lansing, and Dennis updated the permittee's MAERS. The facility has an ROP Sourcewide CO emission limit of 224.9 tpy and 93 tons of CO were reported in the 2016 MAERS.

Records: AQD requested and the permittee provided records addressing the ROP's VI Monitoring/Recordkeeping requirements. Most of the records were provided electronically, and some of these records were printed and will be attached to the report.

MACTS: The facility's potential to emit of any single HAP is equal to or more than10 tons per year. The facility's potential to emit all HAPs combined is equal to or more than 25 tons per year. Because the facility is major for HAPs, the EPA has delegated these MACT Subparts to MI AQD for review, and the ROP includes applicable MACT conditions:

- EUPRESSLINE, EUCOEN (when firing wood) and FGDRYERS are subject to the National Emission Standards for Hazardous Air Pollutants, Plywood and Composite Wood Products promulgated in 40 CFR Part 63, Subparts A and DDDD.

- EUIBW, and EUCOEN when EUCOEN exhausts through SVCOEN and fires natural gas, are subject to the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR Part 63 Subparts A and DDDDD.

- EUDIESELHOTOIL, EUEMERGENCYGEN, and EUFIREPUMP are subject to the Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ (RICE MACT).

MACES:

Facility Information was reviewed and no change was made.

Regulatory Info was reviewed and the following MACTs were added to Subject To:

- 40 CFR Part 63, Subpart DDDDD,
- 40 CFR Part 63, Subpart ZZZZ.

Brochure: The inspection brochure will be forwarded to the permittee with the site inspection notes via email.

Compliance: AQD's report generator for Violation Notices included no active VNs. A review of AQD files shows consent orders 17-1991 and 14-1984 were never terminated. On June 20, 2016 AQD staff spoke to Ms. Moss about the active consent decrees. AQD staff has encouraged the permittee to request termination of these consent decrees.

Inspection: The January 21, 2016 inspection was a planned inspection during a shutdown. Records were reviewed with Faith Dandois. Kathi Moss provided a tour of the facility. AQD staff met Rina Allen who is the plant manager and responsible official. This was a good time to make a tour of the facility because it was easy to discuss the different processes of the facility without the noise of the

equipment operating. AQD staff received telephone numbers to use in case of an onsite emergency, they are: Dryer Control Room 989-348-3418, and Press Control Room 989-348-3420. AQD staff observed all of the emission units and associated control equipment. No odors were noted, and there were no visible emissions.

Faith provided AQD staff a tour of the facility during the March 1, 2016 unannounced inspection when the facility operated. Becky Radulski of AQD participated. There are two obvious large stacks. The southern stack serves the four EU dryers which have two RTOs which vent to the one southern stack. The northern stack serves the one EU press line which is controlled by one biofilter. No visible emissions were noted from either stack. By June 2016 the installation of two new replacement RTOs serving the dryers will be completed and the work is being completed under a Rule 285 exemption. During the site visit the biofilter temperature was 81 degrees F and the existing MAP requires the temperature between 70-120 degrees F. The VOCs from EUPRESSLINE were 31.62 ppm and the permit VOC emission limit is 85.4 tpy. Every two weeks the plant is shut down for approximately 10 hours for scheduled maintenance. No obvious dust was noted.

When the ROP is renewed, it is suggested the Emission Unit Summery Table be updated to better reflect the flow of operation at the facility. At the bottom of this report is a suggested revised Emission Unit Summery Table. In sequence, the flow of operations includes:

- Wood yard, vat/pool,
- Debarking, stranding/chipping,
- Drying/screening/energy: EUDRYER1, EUDRYER2, EUDRYER3, EUDRYER4,
- Mat forming: EUBLENDENT, EUFLAQ,
- Pressing: EUPRESSLINE, EUCOEN, EUIBW,
- Trimming and cleanup: EUMATTRIM, EUFINISHING, EUDRYFUEL, EUCLEANUP,
- Painting: EUPAINTBOOTH
- Backup Equipment: EUDIESELHOTOIL, EUEMERGENCYGEN, EUFIREPUMP.

Permit Conditions:
Unless otherwise noted, these are general comments on conditions IV, VI, VII, and VIII throughout the ROP:

IV. Design/Equipment Parameters. These are limits that are met by the design and installation of the equipment.

V. TESTING/SAMPLING. MACES Report Generator was used to gather many of the dates of the last tests. Any issues with the test results would have been addressed at the time the test reports were reviewed.

VI. Monitoring/Recordkeeping. The permittee completes required calculations and records per the permit limits.

VII. Reporting. The permittee submits deviation reports, semiannual reports, annual certifications, quarterly excess emission reports (EERs), test protocols, 7-day test notifications, and test results within the timeframes identified in the ROP's VII. Reporting requirements. CAM and 40 CFR, Part 63, Subpart DDDD are included in semiannual reporting. Any issues with the reports would be addressed at the time the reports are reviewed.

VIII. Stack/Vent Restrictions. Based on conversation with permittee staff and observations during site inspections, the stack vents meet the diameter and height permit limits. It is noted the FGDRYER RTOs are being replaced under a R285 exemption. Per conversation with permittee staff the RTOs stack limits will be compliant with permit limits.

Records are maintained for a period of five years.

SOURCE-WIDE CONDITIONS

I.1. CO is limited to 224.9 tpy. The 2016 MAERS reported 92 tons of source wide CO emissions.

EUPRESSLINE

I. EMISSION LIMIT(S)

Pollutant	Limit	Equipment	Comment
1. PM-10	0.010grper drystandard cubicfoot	EUPRESSLINE	*
2. PM-10	8.4pph	EUPRESSLINE	*
3. PM-10	34.1tpy	EUPRESSLINE	The November 2015 12-month rolling PM-10 emissions were 32.01 tons.
4. PM-10	24.7pph	EUPRESSLINE (whenthe exhaustisnot routedthrough thebiofilter)	*
5. PM-10	8.0tpy	EUPRESSLINE (whenthe exhaustisnot routedthrough thebiofilter)	The November 2015 record shows the EUPRESSLINE always routed thru the biofilter.
6. CO	26ppmv	EUPRESSLINE	*
7. CO	11.4pph	EUPRESSLINE	*
8. CO	50tpy	EUPRESSLINE	The November 2015 12-month rolling CO emissions were 10.52 tons.
9.Formaldehyde (HCHO)	6.2mg perdrystandard cubic meter	EUPRESSLINE	*
10. HCHO	2.3pph	EUPRESSLINE	*.
11. HCHO	90% reduction	EUPRESSLINE	*
12. VOC (expressedas carbon)	19.5pph	EUPRESSLINE	Record provided shows 9.971 pph VOC emissions on a 30 day rolling average. Compliance with VOC emission limits is thru CEMS and requires quarterly reporting via an EER. Any issues with an EER would be addressed at the time of review.
13. VOC (expressedas carbon)	85.4tpy	EUPRESSLINE	The November 2015 12-month rolling VOC emissions were 62.79 tons.

*Testing is the compliance method for this condition. Any issues with the test results would have been addressed when the test results were reviewed.

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee must maintain the 24-hour block bio-filter bed temperature within the range established during compliance testing.
   • The draft updated SSMAP includes the biofilter bed temperature range of 77.7 degrees F – 99.9 degrees F.
   • Records include Biofilter Thermocouple Readings for zones. Temperatures on 11/16/15 ranged from 84 to 98 degrees F.

2. The permittee shall not bypass the bio-filter for more than 0.5% of the annual operating time for EUPRESSLINE.
   • See the Airsum report. There has not been a bypass since 2007.

3. The permittee shall not operate EUPRESSLINE unless the bio-filter is operating properly, except during bypass conditions as stated below and in the Routine Control Device Maintenance Exemption.
   • See the Airsum report. There has not been a bypass since 2007.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. VOC CEMS is installed. Annual RATA is completed. EERs are submitted reporting downtime or excess emissions.

2. The permittee installed, operates and maintains a system to continuously monitor the bed temperature in the bio-filter.
   • During the March 1, 2016 the biofilter temperature was 81 degrees F and the existing MAP requires the temperature between 70-120 degrees F.

3. By equipment design, the permit complies with the temperature monitoring device meet the requirements in 40 CFR 63.2269(a) and 40 CFR 63.2269(b)(1) through (6).
   • In addition to the monitors being installed, there are redundant monitors/thermocouples for backup.

4. The permittee must maintain the design of the enclosure surrounding the press area so that it meets the definition of a wood products enclosure in 40 CFR 63.2292.
   • See the Press Enclose Press Sheet. All of the openings/doors/windows have negative air at 200 cfm.

V. TESTING/SAMPLING

1. Verification of PM_{10}, CO, and Formaldehyde emission rates from EUPRESSLINE during normal operation is required once every five years.

Pollutant Tested:	Date of last test:	Date next text is due:
PM_{10}	11/26/2012	11/26/2017
CO	11/26/2012	11/26/2017
Formaldehyde/HCOH	11/26/2012	11/26/2017

2. The permittee shall conduct a repeat performance test for formaldehyde destruction efficiency 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% by volume of the biofilter bed media with the same type of media. The permittee must reestablish the biofilter temperature range during this testing if the biofilter has been modified since the last testing.

Pollutant Tested:	Date of last re-test:	Did re-test meet deadline?	Date next text is due:	Last date of replacement of biofilter bed media	Reestablished biofilter temperature range:

				with a different type of media or each replacement of more than 50% by volume of the biofilter bed media with the same type of media:	
Formaldehyde/HCOH	October 28, 2014	Yes	Near October 28, 2019	October of 2014. Replacement due October of 2016.	The SSMAP includes a Biofilter Bed Temperature range between 77.7 - 99.9 degrees F.

3. The permittee shall perform the Quality Assurance Procedures (RATA) of the CEMS.

Pollutant with CEMS:	Date of last test:	Date next text is due:
VOC	12/8/2015	12/8/2016

VI. MONITORING/RECORDKEEPING

1. The permittee meets the deadlines for calculations and record keeping.

2. The permittee shall monitor and record the volumetric flow rate on the biofilter stack.
   - See computer screen while on site for biofilter volumetric flow rate.
   - On 3/1/16 the screen shot includes, "Press stack monitors. Air Flow. 104,595 SCFM."
   - The existing MAP includes "Press and Biofilter, Airflow, Normal Range 0-200,000 CFM."

3. The permittee shall monitor and record VOC emissions in a manner and with instrumentation acceptable to the AQD at the bio-filter stack.
   - The Biofilter Thermocouple Readings record includes VOC in PPH 30 DRA.
   - The November 2015 records include VOC PPH 30 DRA at 9.971 which is less than the permitted 19.5 pph based on a 30-day rolling average.

4. The permittee shall monitor, in a satisfactory manner, and record the time and duration of any bio-filter bypass on a daily basis.
   - See on site the MACT Exceedance Workbook. There has not been a bypass since 2007.

5. During bypass, the permittee shall monitor and record the tons of finished product, tons of hardwood usage, percent of hardwood usage, tons of pine usage, percent of pine usage, as well as calculate the PM_{10}, CO, and VOC emissions per the formula found in Appendix 7.
   - There has not been a bypass since 2007.

6. The tons of finished product and hours of operation for EUPRESSLINE are monitored and recorded daily.
   - For monthly records see the Airsum report. For daily records see onsite computer monitors.
   - The permit does not have process restriction on the amount of finished product.

• The EUPRESSLINE Daily Hours report for 6/2/15 recorded hours of operation as "Calculated Daily Hours 23.9." The permit does not limit the hours of operation.

7. The permittee shall use the most recent stack testing data and perform monthly calculations, to show compliance with the hourly and yearly limits for PM_{10}, CO, and the hourly limits for Formaldehyde.
   • Per conversation with Ms. Moss, the most recent stack testing data is used.

8-9. The permittee continuously monitors and records biofilter bed temperature data for EUPRESSLINE.
   • Records include Biofilter Thermocouple Readings for zones of the biofilter.
   • Temperatures on 11/16/15 range from 84 to 98 degrees F which fits the established range of 77.7 - 99.9 degrees F in SSMAP.

VII. REPORTING

1-4. The permittee is on time when submitting deviation reports, semiannual reports, annual certifications.

5. AQD staff did not find documentation of EUPRESSLINE startup, shutdown, or malfunction reports.

6. The permittee submits the annualauditsofCEMSand the quarterly audits, and is on time.

7, 8, 9, 11. Regarding submitting complete test protocols, providing notice of tests and test reports, and EERs the permittee meets the permitted timeframes.

10. The permittee must submit documentation that the wood products enclosure meets the press enclosure design criteria in 40 CFR 63.2292 with your Notification of Compliance Status for EUPRESSLINE.
   • For a quick observation on site, see the "streamers" that are hung to show air flow on the pressline.
   • For more info, see Press Enclosure Checksheet. Ms. Moss said the documentation was submitted in the past.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)

1. The SSMAP is being updated. The SSMAP addresses provisions in 40 CFR 63.6(e)(3), and Rule 911.

2. The permittee must abide by the Control Device Routine Maintenance Device exemption approved for the EUPRESSLINE.
   • There has not been a bypass since 2007.

3. As a general statement, based upon this FCE, the permittee complies with the applicable requirements in 40 CFR Part 63, Subpart DDDD National Emission Standards For Hazardous Air Pollutants: Plywood and Composite Wood Products.

EUPAINTBOOTH

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Comment
1. Particulate Matter (PM)	0.94pph	Monthly average	EUPAINTBOOTH	See the Airsum report, Mass Emissions and Stats tabs. Example: June 2016 the PM was 0.43 pph.

2. PM	4.1 tpy	Based on a 12-month rolling time period	EUPAINTBOOTH	See the Airsum report, Mass Emission tab line 108. Example: January 2016 PM emissions were 1.68 tons for the 12 month rolling time period.

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The paint booth exhaust filters are installed.

2. The SSMAP includes the pressure drop range across the Paint Booth filters from 0.03" to 3.0" wg. The Shift Summary Finishing record includes Baghouse/Dust Collection System Checks. The 12/4/15 record includes "Enter the baghouse pressure drop reading for each bag, Finishing 1; Paint Booth Dwyer Gauge pressure drop, 0.05." This is within the SSMAP range of .03" to 3.0" wg.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee has a device to measure the differential pressure across the filter media for EUPAINTBOOTH.

V. TESTING/SAMPLING

-NA

VI. MONITORING/RECORDKEEPING

1. The permittee monitors and records the pressure drop across the paint booth, once per day, to show the filter is operating properly. See III. 2 above.

2. The permittee keeps monthly records of the amount of paint used, in gallons, for EUPAINTBOOTH.
   - See Airsum report, Stats tab for the records.

3. The permittee calculates and records monthly the particulate matter emissions for EUPAINTBOOTH in pounds per hour (pph) based on a monthly average and tons per year (tpy) based on a 12-month rolling time period.
   - See the Airsum report, Mass Emissions tab. In the month of January 2016, 0.15 tons of PM emissions were reported (0.94 pph are permitted) and the 12-month rolling PM was 1.68 (5.1 tpy permitted).

4. The permittee shall keep records showing the use of only non-HAP coatings as defined in 40 CFR 63.2292.
   - See record called MACT Misc. Coatings Status for this record.

VII. REPORTING

1-3. The permittee is on time when submitting deviation reports, semiannual reports, and annual certifications.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)

1. The permittee shall use only non-Hazardous Air Pollutant coatings as defined in 40 CFR 63.2292.
   - See the Misc Coatings Status record. Recently the permittee self-reported use of a hazardous coating which was resolved.

EUIBW
The EUIBW includes Thermal Oil Heater 2 (*TOH2).*

When the ROP is renewed, it is recommended EUIBW's "Description" be updated as described at the bottom of this document.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Comment
1. NO_X	1.9 pph	Based on a 3-hour rolling time period	EUIBW	See the Airsum report, Mass Emission tab. Stack test was 1.63 pph. For hourly see permittee's data acquisition system.
2. CO	2.3 pph	Based on a 3-hour rolling time period	EUIBW	See the Airsum report, EF tab. CO is on line 29 column D. Test result show 0.003 pph. For hourly see permittee's data acquisition system.

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall perform routine and scheduled maintenance on EUIBW as recommended by the manufacturer and contained in the approved MAP.
   • On 3/8/2016 AQD received from the permittee notice of Initial Compliance with the Boiler MACT, Part63 Subpart DDDDD, this includes maintenance.

2. At all times, the permittee must operate and maintain EUIBW including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
   • The current SSMAP page 8 does not include EUIBW Normal Range/Reading on TOH2, but the SSMAP will be revised and included TOH2 operating ranges.

3. The permittee must complete an initial tune-up by following the procedures in SC III.5, no later than January 31, 2016. The permittee must complete the one-time energy assessment no later than January 31, 2016.
   • Per conversation with Kathi Moss, this was completed with a notice sent to the AQD.

4. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual performance tune-up. Each annual tune-up must be conducted no more than 13 months after the previous tune-up.
   • Per Ms. Moss, the dates of the last tunes up were January 5, 2016 on TOH1, and May 23, 2016 on TOH2.

5. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs 40 CFR 63.7540(a)(10) through (13), as listed below.
   • Work orders are the demonstration of compliance a record of the inspections, etc. required. The annual tune-ups are part of the demonstration of compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)-NA

V. TESTING/SAMPLING

1. Verification of CO and NO_x emission rates by testing from EUIBW shall be conducted once every five years.

Pollutant Tested:	Date of last test:	Date next text is due:
CO	11/26/2012	11/26/2017
NOx	11/26/2012	11/26/2017

VI. MONITORING/RECORDKEEPING

1. The permittee shall keep records on the amount of natural gas used on a daily basis.
   • The TOH2 Daily Gas Usage document serves to record daily gas usage. The ROP does not limit gas usage.

2. The permittee shall monitor and record the hours of operation of EUIBW on a continuous basis.
   • The EUIBW TOH2 Hourly NOx Calculations serves as a record of hours of operation of EUIBW.

3. The permittee shall calculate and record the hourly NO_x, and CO emissions from EUIBW based on a 3 hour rolling time period.
   • See the data acquisition system when on site for the hourly records.

4. The permittee must keep a copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63, Subpart DDDDD.
   • Ms. Moss stated the permittee does have on file copies of the notifications.
5. The permittee's records must be in a form suitable and readily available for expeditious review.
   • The permit is very meticulous when it comes to record keeping.

VII. REPORTING

1-3. The permittee is on time when submitting deviation reports, semiannual reports, and annual certifications.

4-6. The permittee is on time when submitting test protocols, providing notice of tests and test reports; the permittee meets the permitted timeframes.

7. The permittee must submit an initial Notification of Compliance Status that includes the following information certified and signed by a responsible official:
   • Per Ms. Moss, this notice was re-sent in January 2016 to include EUIBW's TOH2 when it vents to atmosphere and when burning natural gas.

8. For units that are subject only to a requirement to conduct an annual tune-up and not subject to emission limits or operating limits, the permittee shall submit an annual compliance report no later than March 15 for the previous calendar year.
   • Only TOH1 and TOH2 are subject and require a tune-up. 2016 is the year to comply; the permittee's compliance report to AQD will be submitted in 2016.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)

1. Only natural gas shall be used as fuel in EUIBW.
   • The TOH2 Daily Gas Usage record is an example of how much gas is used. While onsite see the data acquisition system for record.

2. As a general statement, based upon this FCE, the permittee complies with all applicable requirements in 40 CFR Part 63, Subpart DDDDD.

EUCOEN
The EUCOEN includes Thermal Oil Heater (*TOH1).*

When the ROP is renewed, it is recommended EUCOEN's "Description" be updated as described at the bottom of this document.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Comment
1. NOx	5.0pph	Natural gas fuel only	EUCOEN	See the Airsum report for NOx and CO totals which are calculated monthly. The permittee uses stack test data from TOH2 to calculate the TOH1 emissions.
2. CO	3.4pph	Natural gas fuel only	EUCOEN	See the Airsum report for NOx and CO totals. The permittee uses stack test data from TOH2 to calculate the TOH1 emissions.

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. When burning natural gas only, exhaust gas from the EUCOEN may exhaust either through SVCOEN or through the WESP and RTO.
   - Per conversation with permittee staff, this is the standard operating procedure.
   - When EUCOEN exhausts thru SVCOEN then EUCOEN may only burn natural gas!

2. The permittee shall perform routine and scheduled maintenance on EUCOEN as recommended by the manufacturer and contained in the approved MAP.
   - The SSMAP includes EUCOEN Preventative Maintenance and frequency and includes recordkeeping requirements. Records submitted show ongoing maintenance.

3. At all times, the permittee must operate and maintain EUCOEN including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices.
   - AQD receives and reviews quarterly EERs which includes monitor down time and excess emissions which speaks to the quality of ongoing maintenance. Permittee staff contacts AQD as required if there is an upset.

4. The permittee must complete an initial tune-up by following the procedures in SC III.6, no later than January 31, 2016. The permittee must complete the one-time energy assessment no later than January 31, 2016.
   - Per conversation with Kathi Moss, this was completed with a notice sent to the AQD.

5. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual performance tune-up. Each annual tune-up must be conducted no more than 13 months after the previous tune-up.
   - Per Ms. Moss, the dates of the last tunes up were January 5, 2016 on TOH1, and May 23, 2016 on TOH2.

6. The permittee must demonstrate continuous compliance with the work practice standards in 40 CFR Part 63, Subpart DDDDD, Table 3 that applies according to the methods specified in

40 CFR 63.7540a)(10) through (13), as listed below.

- Work orders are the demonstration of compliance and record of the inspections, etc. required. The annual tune-ups are part of the demonstration of compliance.

IV. DESIGN/EQUIPMENT PARAMETER(S)

-NA

V. TESTING/SAMPLING

-NA

When the ROP is renewed, it is suggested adding NOx and CO testing requirements, similar to EUIBW: "Verification of CO and NOx emission rates by testing from EU_ shall be conducted once every five years. R 213, R 336.2001)

VI. MONITORING/RECORDKEEPING

1. The permittee shall record and maintain records of the amounts of natural gas combusted in EUCOEN each calendar day.
   - The Daily Gas Usage document serves to record daily gas usage. The ROP does not limit gas usage.

2. The permittee shall monitor and record the hours of operation of EUCOEN on a continuous basis when venting to SVCOEN.
   - The Hourly NOx Calculations document serves as a record of hours of operation.

3. The permittee shall calculate the hourly NO_x and CO emissions from EUCOEN monthly when firing natural gas only.
   - Currently, the permittee uses stack test data from TOH2 to complete the calculations.
   - When the ROP is renewed, it is suggested this Rule 213 condition be updated for clarity. At the bottom of this document is a draft update.

VII. REPORTING

1-3. Regarding submitting deviation reports, semiannual reports, annual certifications, see note above.

4. On January 24, 2012 Weyerhaeuser submitted the Boiler MACT Initial Notification. On January 21, 2016 Weyerhaeuser re-submitted to AQD a revised initial notification because it was concluded by EPA and AQD the EUCOEN is subject to 40 CFR Part 63 Subpart DDDDD (Boiler MACT) when EUCOEN Number 1 Thermal Oil Heater (TOH1) vents to atmosphere combust and burns natural gas only.

5. For units that are subject only to a requirement to conduct an annual tune-up and not subject to emission limits or operating limits, the permittee shall submit an annual compliance report no later than March 15 for the previous calendar year.
   - TOH1 and TOH2 only require a tune-up. 2016 is the year to comply, the compliance report will follow.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)

1. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 of 40 CFR Part 63, Subpart DDDDD that applies according to the methods specified in paragraphs 40 CFR 63.7540(a)(10) through (13), as listed below.
   - Work orders demonstrate a record of the inspections, etc. required. See work orders for demonstration of compliance; also the annual tune-ups are part of the demonstration of compliance.

FGDRYERS

The flexible group includes four wood flake dryers and EUCOEN.

When the ROP is renewed, it is recommended FGDRYERS' "Description" be updated as described at the bottom of this document.

I. EMISSION LIMIT(S)

Pollutant	Limit	Equipment	Comment
1. PM10	0.030 gr per dscf	FGDRYERS (during2-unitRTO operation)	*
2. PM10	29.8pph	FGDRYERS (during2-unitRTO operation)	
3. PM10	0.057grper dscf	FGDRYERS (during1-unitRTO operation)	
4. PM10	56.6pph	FGDRYERS (during1-unitRTO operation)	
5. PM10	136.4tpy	FGDRYERS (duringall operations)	The November 2015 12-month rolling PM10 emissions were 93.98 tons.
6. PM	0.10lbspermillion BTUheatinput	EUCOEN (whenfiringwith wood)	The UAR is 40 CFR 60.34c (b) (1). 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units regulates "steam generating units." EUCOEN does not generate steam, and per conversation with Ms. Moss, EUCOEN never generated steam. Based upon this, unless new or different information is available, it is determined EUCOEN is not subject to Subpart Dc. It is recommended the permittee submit paperwork to AQD to make a modification to the ROP to remove condition I.6. The condition has a footnote meaning the condition is from a PTI.
7. SO2	5pph	FGDRYERS	Testing was in November 2012. *
8. SO2	21.9tpy	FGDRYERS	The November 2015 12-month rolling SO2 emissions were 3.09 tons.
			Testing was in November

9. NOx	23.15pph	FGDRYERS	2012. Retest was in March 2013. *
10. NOx	101.4tpy	FGDRYERS	The November 2015 12-month rolling NOx emissions were 95.47 tons.
11. CO	147.3pph	FGDRYERS (Atalltimes(2unit RTOoperation) exceptduringRTO maintenanceand washing)	CEM is the demonstration of compliance. Quarterly EER would document excess emissions.
12. CO	343.7pph	FGDRYERS (DuringRTO maintenanceand washing(1unit RTOoperation))	CEM is the demonstration of compliance. Quarterly EER would document excess emissions.
13. CO	149.8tpy	FGDRYERS	The November 2015 12-month rolling CO emissions were 82.10 tons.
14. HCHO	2.4pph	FGDRYERS	Test was in November 2012.
15. TotalHAP Measured THC (as carbon)	90% reduction oftotalHAP enteringtheRTO	FGDRYERS	*
16. VOC (as carbon)	18.6pph	FGDRYERS	CEM is the demonstration of compliance. Quarterly EER would document excess emissions.
17. VOC (as carbon)	81.5tpy	FGDRYERS	The November 2015 12-month rolling VOC emissions were 32.36 tons.

*Testing is the compliance method for this condition. Any issues with the test results would have been addressed when the test results were reviewed.

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee operates FGDRYERS with the WESP and RTO operating.

2. The permittee shall not bypass one or both RTO units for more than 3% of the annual operating uptime for FGDRYERS. The permittee may operate FGDRYERS with only the WESP, or with the WESP and a partially bypassed RTO for necessary maintenance, repair, or parts replacement of the RTO.
   - Per conversation with Ms. Moss, for bypass events, different emission factors are used to calculate emissions. The emission factors were developed via testing. Ms. Moss said in the near future there will be updated re-testing and new EF will be developed.
   - The VOC and CO CEMS provide instant information if there is non- compliance with VOC and

CO emission limits.

3. When burning wood in EUCOEN, exhaust gases from EUCOEN shall be discharged through the WESP and RTO consistent with safe operating procedures.
   • Ms. Moss said this is practiced.

4. When operating FGDRYERS the permittee shall maintain the 3-hour block average fire box temperature in the RTO at or above the minimum temperature established during the performance testing in which the THC reduction in the RTO exhaust was above the required 90%.
   • There are records of RTO temps. The SSMAP includes RTO temp range.

5. The permittee must install, operate, and maintain each temperature monitoring device or other Continuous Parameter Monitoring System (CPMS) according to the following. The CPMS system must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15- minute period. At all times, permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. Permittee shall record the results of each inspection, calibration, and validation check.
   • Thermal couples inside the RTO are used to monitor temps. Each RTO has two thermal couples for redundancy-incase one fails.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee installed and operates a COMS at the RTO to monitor opacity from EUDRYERS and EUCOEN when firing wood. Quarterly EERs include monitor downtime. Any issues with monitor downtime would be addressed when the EER is reviewed.

2. The permittee installed a CEMS at the RTO exhaust to monitor VOC and CO. Quarterly EER includes information on VOC and CO.

3. The RTO temperature monitoring devices are installed.

V. TESTING/SAMPLING

1. Stack testing on EUCOEN for PM when using wood and/or wood dust for fuel, shall be performed once every five years.
   • A review of 2012 test plans and reports show EUCOEN (FGDRYER) PM testing for total PM was performed.

   • The test condition is included to show compliance with the PM limit with Subpart Dc as the UAR. Unless new or different information is available, it is determined EUCOEN is not subject to Subpart Dc. It is recommended the permittee submit paperwork to AQD to make a modification to the ROP to remove testing condition V.1. The testing requirement was added when the ROP was written. The condition has no footnote, and the conditions includes Rule 213 as a UAR.

2. Stack testing on FGDRYERS for PM_{10}, SO_2, NO_x, and Formaldehyde emissions shall be performed once every five years.

Pollutant Tested:	Date of last test:	Date next text is due:
PM_{10}	11/26/2012	11/26/2017
SO2	11/26/2012	11/26/2017
NOx	11/26/2012	11/26/2017
Formaldehyde	11/26/2012	11/26/2017

3. Stack testing for reduction of Total HAP, measured as THC, from FGDRYERS, shall be performed once every two years.

Pollutant Tested:	Date of last test:	Date next text is due:
Total HAP, measured as THC	11/26/2012	11/26/2017

4. During the performance test for reduction of total HAP measured as THC, the permittee must continuously monitor the RTO fire box temperature during each of the required 1-hour test runs. The minimum fire box temperature must then be established as the average.

Pollutant Tested:	Date of last test:	Date next text is due:	The resulting minimum fire box temperature established was:	Was the MAP updated to include this number?
Total HAP measured as THC, the permittee continuously monitored the RTO fire box temperature.	11/26/2012	11/26/2017	1352 Degrees F	Yes. The draft SSMAP includes 1352 Degrees F.

5. The permittee shall perform the Quality Assurance Procedures of the CEMS and COMS per 40 CFR Part 60, Appendix F.
   - The FGDRYERS have CEMS for VOC and CO, and does not have COM. The last RATA was in December 2015.

VI. MONITORING/RECORDKEEPING

1. The permittee continuously monitors and records the volumetric flow rate at the RTO stack.
   - As an example of this record, the permittee provided the most recent RATA report which includes the Average Air Flow (SCFM) and ranges from 94405 – 115064 SCFM.

2. The permittee continuously monitors and records RTO fire box temperature and Total HAPs as THC in the RTO exhaust at all times that the RTO is controlling the emissions while FGDRYERS is operating.
   - When on site AQD staff may observe the RTO temp monitor. Past temp records are electronic and available upon request. THC is a VOC and VOC has a CEM.

3. The permittee shall monitor and record FGDRYERS operating time and any time one or both RTO units are bypassed.
   - These are electronic records, and see also the Airsum report, Operating Hours tab.

4. The permittee shall keep records of the date, time, duration, and reason for each occurrence of emission control system bypass operation that occurs.
   - These records are in an Excell Workbook, an example of the record was provided.

5. The permittee shall monitor and record the VOC and CO emissions from FGDRYERS on a continuous basis using CEMS.
   - Quarterly EERS include CEMs downtime and excess emissions. Any issues would be addressed with the EER is reviewed. EUCOEN is not required to have a VOC or CO CEM. If EUCOEN burns wood then EUCOEN exhausts through the dryer and WESP and RTO. The permit requires CO and VOC CEMS on FGDRYERS.

6. The permittee shall monitor and record the visible emissions from FGDRYERS on a continuous basis.
   - Quarterly EERS include COMs downtime and excess emissions. Any issues would be addressed with the EER is reviewed.

7, 8, 9, 10, 11, 12, 13. These are CAM compliance conditions. The most recent CAM Excursion/Exceedance and Monitor Downtime reports show zero deviations.

14. For all pollutants not monitored by CEMS, the permittee shall calculate the emission factors using the most recent stack testing data.
    - Pollutants not monitored by CEMS include: PM, PM10, SO2, NOx, HCHO, HAP/THC.
    - See Airsum report, EF tab for emissions information.

15. As a general statement, the permittee completes required calculations and records per the permit limits; this would include the required emissions calculations for CO, SO_2, NO_x, PM_{10} and Formaldehyde.

VII. REPORTING

1-3. Permittee is on time when submitting deviation reports, semiannual reports, and annual certifications.

4-5. CAM reports were on time and included CAM Excursion/Exceedance and Monitor Downtime and the latest reports show zero deviations.

6-9. RATA and compliance test include on time submittal of test plans, notification, and reports.

10-11. The AQD received MACT (Part 63) reports on 3/7/16 and 9/25/15.

12-13. Quarterly EERs are on time.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)

1. The permittee must develop a written SSMP. See notes above.

2. The permittee must abide by the Routine Control Device Maintenance Device Exemption in SC III.3 approved for the FGDRYERS. The MACT report keeps track of info on a monthly report.
    - The PCWP semiannual reports include these items. Any issues would be addressed when the report is reviewed.

3. Based on review under this FCE, the permittee complies with 40 CFR Part 63, Subpart DDDD, Plywood and Composite Wood Products.

4-5. These are CAM requirements. The most recent CAM reports reported zero deviations.

6. The permittee shall maintain an AQD approved Monitoring Plan for CEMS and COMS.
    - AQD has on file QA/QC plans on file for CEMS and COMs. They do not include and approval letter.
    - Torello communicated with Rob Dickman, AQD, about the QA/QC plans, and the QA/QCs may be approved.

FGWOODHANDLING

I. EMISSION LIMIT(S)

Pollutant	Limit	Equipment	Comment
1. PM	0.002 lbs Per 1,000 lbs of dry exhaust gases[2]	FGWOODHANDLING	See the form "Press CERMS for VOC's Daily Checklist...." for VE readings. Also, there are records for baghouse pressure readings.

2. PM	1.86pph	FGWOODHANDLING	While on site AQD staff needs to look at data system for PPH readings.
3. PM	8.1tpy	FGWOODHANDLING	See the Airsum report, Mass Emissions tab. Example: Bag House PM for January 2016 was 7.43 tons of PM for 12-month rolling time.
4. Visible emissior	5%opacity	FGWOODHANDLING	Permittee looks for leaks while on "walk around" and records leaks on "Press CERMS for VOC's Daily Checklist form.
5. PM_{10}	0.41 pph	EUBLENDVENT	The "Press CERMS for VOC's Daily Checklist" form includes VE and pressure drop readings which are the demonstration of compliance methods for PM10 and PM25.
6. $PM_{2.5}$	0.41 pph	EUBLENDVENT	

II. MATERIAL LIMIT(S)

-NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee operates FGWOODHANDLING with cyclones and baghouses installed.

2. FGWOODHANDLING has a gauge to measure pressure drop across baghouses.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. FGWOODHANDLING is equipped with cyclones and baghouses.

2. The permittee installed a gauge which measures the pressure drop across each baghouse.

V. TESTING/SAMPLING

-NA

VI. MONITORING/RECORDKEEPING

1. The permittee shall complete all required calculations and records by the last day of the calendar month, for the previous calendar month, unless otherwise specificed in any monitoring/recordkeeping special condition.
   - Permittee's records are well maintained and available to AQD staff.

2. The permittee shall calculate the PM emissions per the formula found in Appendix 7.
   - See the Airsum report, Mass Emissions tab.

3. The permittee shall monitor continuously and record once daily, the pressure drop across each baghouse in FGWOODHANDLING on a continuous basis.
   - See "Press CERMS for VOC's Daily Checklist" report.

4. The permittee shall monitor the baghouse to verify it is operating properly, by taking 6 minute visible emission readings for FGWOODHANDLING a minimum of once per calendar day when the equipment is operating.
   - See, for example, "Press CERMS for VOC's Daily Checklist..."

5. The permittee shall keep, in a satisfactory manner, records of all visible emission readings for FGWOODHANDLING.
   - See, for example, "Press CERMS for VOC's Daily Checklist..."

VII. REPORTING

1-3. Regarding submitting deviation reports, semiannual reports, annual certifications, the permittee is on time.

VIII. STACK/VENT RESTRICTION(S)

-See note above.

IX. OTHER REQUIREMENT(S)-NA

FGDIESEL-ENGINES
Includes three engines: Diesel Hot Oil, Emergency Gen, and Fire Pump

I. EMISSION LIMIT(S)-NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Comment
1. Diesel Fuel (No. 1 or 2 only)	0.5% sulfur maximum	Test Protocol	FGDIESEL-ENGINES	The November 15, 2015 analysis was provided. Total Sulfur was 0.012%.

III. PROCESS/OPERATIONAL RESTRICTION(S)

1-5. Records for all of 2014 and January- November 2015 were reviewed. No single engine operated for more than 100 hours in a year. The number of hours the engines operated are below the permitted limits.

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall equip and maintain FGDIESEL-ENGINES with a non-resettable hour meter.
    - Ms. Moss said the meter was installed years ago.

V. TESTING/SAMPLING

-NA

VI. MONITORING/RECORDKEEPING

1. The permittee shall keep records (for 40 CFR 63.6655).
    - Boiler MACT started in January 2016, records are kept on site.

VII. REPORTING

1-3. Regarding submitting deviation reports, semiannual reports, annual certifications, the permittee is on time.

VIII. STACK/VENT RESTRICTION(S)

-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.

- All indications are the permittee is complying with ZZZZ.

Conclusions:

FGDRYERS

I.6. It is recommended the permittee submit paperwork to AQD to make a modification to the ROP to remove condition I.6. Unless new or different information is available, it is determined EUCOEN is not subject to Subpart Dc.

V.1. It is recommended the permittee submit paperwork to AQD to make a modification to the ROP to remove testing condition V.1.

IX. 6. The permittee shall maintain an AQD approved Monitoring Plan for CEMS and COMS.
- AQD has on file QA/QC plans on file for CEMS and COMs. The files do not include and approval letters. AQD will send letters approving the QA/QCs.

Via onsite inspection, review of records, and discussion with permittee, the permittee demonstrates compliance with the conditions of permit MI-ROP-B7302-2016.

Suggestions when the ROP is renewed:

Emission Unit Summery Table

Update the Emission Unit Summery Table to better reflect the *flow* of operation at the facility. At the bottom of this report is a suggested revised Emission Unit Summery Table. The layout of the ROP would be updated accordingly.

EUIBW

Update "Description" to include:

> "This table consists of the EUIBW which is the Number 2 thermal oil heater (TOH2) manufactured by IBW. It is a 40 MMBTU/hr natural gas burning heater that exhausts directly to atmosphere through its own stack (SVIBW). Hot oil from EUIBW supplies heat to EUPRESSLINE press plates, plant building heaters, and during the winter supplies to heat the water vat used to thaw and clean the logs as logs enter the process."

EUCOEN

Update "Description" to include:

> "This table consists of the EUCOEN which is the Number 1 Thermal Oil Heater (TOH1) manufactured by Coen. This thermal oil heater is rated at 50 MMBTU/hr when burning wood and wood dust, and this heater is rated at 40 MMBTU/hr when burning natural gas. Hot oil from EUCOEN supplies heat to EUPRESSLINE press plates.
>
> This table includes the conditions when EUCOEN vents to SVCOEN. When EUCOEN vents to SVCOEN then EUCOEN shall burn natural gas only.
>
> If EUCOEN burns natural gas and/or wood and wood dust then EUCOEN is subject to the conditions in table FGDRYERS. When EUCOEN burns wood and wood dust, the exhaust shall be directed through the dryers and the WESP and RTO."

Update V. Testing/Sampling

> When the ROP is renewed, it is suggested adding CO and NOx testing requirements, similar to EUIBW: "Verification of CO and NOx emission rates by testing from EUIBW shall be conducted once every five years. R 336.1213, R 336.2001)

Update SC VI.3. When the ROP is renewed, it is suggested this Rule 213 condition be updated for clarity. Here is a draft update:

> "The permittee shall calculate the NOx and CO emissions in pph from EUCOEN using a formula acceptable to AQD. The formula shall be based on the most recent EUCOEN stack test results. The NOx and CO calculations shall be completed once per month for those months when, anytime during the month, EUCOEN fired on natural gas only and vented to atmosphere through

SVCOEN."

FGDRYERS.
Update "Description" to include:
"This group consists of four wood flake dryers and EUCOEN with the Number 1 Thermal Oil Heater (TOH1). EUCOEN is fired on natural gas and/or wood and wood dust and EUCOEN exhausts through the dryers' WESP and RTO."

EMISSION UNIT SUMMARY TABLE-
Suggested revised Emission Unit Summery Table for next ROP renewal:

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUDRYER1	Dryer number 1 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 40 MMBTU/hr with an auxiliary gas start-up burner and a natural gas ring burner rated at 40 MMBTU/hr. Controlled by a Wet Electrostatic Precipitator (WESP) followed by a Regenerative Thermal Oxidizer (RTO).	08/01/1980 06/21/2002	FGDRYERS
EUDRYER2	Dryer number 2 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 40 MMBTU/hr with an auxiliary gas start-up burner and a natural gas ring burner rated at 40 MMBTU/hr. Controlled by a WESP followed by a RTO.	08/01/1980 06/21/2002	FGDRYERS
EUDRYER3	Dryer number 3 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 40 MMBTU/hr with an auxiliary gas start-up burner, and a natural gas ring burner rated at 40 MMBTU/hr. Controlled	08/01/1980 06/21/2002	FGDRYERS

	by a WESP followed by a RTO.		
EUDRYER4	Dryer number 4 is used to dry wood flakes. The heat source is a wood fueled, suspension burner rated at 40 MMBTU/hr with an auxiliary gas start-up burner, and a natural gas ring burner rated at 40 MMBTU/hr. Controlled by a WESP followed by a RTO.	08/01/1980 06/21/2002	FGDRYERS
EUBLENDVENT	Blending core transfer, and core forming area controlled by a baghouse. The baghouse fan is rated at 42,000 acfm.	07/14/2012	FGWOODHANDLING
EUFLAQ	Forming Line Air Quality Pneumatic pickups on the surface forming equipment contain vagrant particulates within the system. Controlled by a Baghouse	08/01/1980 06/17/2009	FGWOODHANDLING
EUPRESSLINE	This emission unit covers the storage of dried flakes from the dryers, through the blending, forming, and pressing to form the board. The Biofilter and total enclosure controls the emissions from the press portion of this emission unit. Cyclones and baghouses control the emissions from the blending and forming portions.	08/01/1980 11/14/1995 03/27/2002	NA
	This table consists of the EUCOEN which is the Number 1 Thermal Oil Heater (TOH1) manufactured by Coen. This thermal oil heater is rated at 50 MMBTU/hr when burning wood and wood dust, and this		

EUCOEN	heater is rated at 40 MMBTU/hr when burning natural gas. Hot oil from EUCOEN supplies heat to EUPRESSLINE press plates. This table includes the conditions when EUCOEN vents to SVCOEN. When EUCOEN vents to SVCOEN then EUCOEN shall burn natural gas only. If EUCOEN burns natural gas and/or wood and wood dust then EUCOEN is subject to the conditions in table FGDRYERS. When EUCOEN burns wood and wood dust, the exhaust shall be directed through the dryers and the WESP and RTO.	08/01/1980 11/14/1995	FGDRYERS
EUIBW	This table consists of the EUIBW which is the Number 2 thermal oil heater (TOH2) manufactured by IBW. It is a 40 MMBTU/hr natural gas burning heater that exhausts directly to atmosphere through its own stack (SVIBW). Hot oil from EUIBW supplies heat to EUPRESSLINE press plates, plant building heaters, and during the winter supplies to heat the water vat used to thaw and clean the logs as logs enter the process.	08/01/1980	NA
EUMATTRIM	Formed mat trim line Controlled by a Baghouse.	08/01/1980	FGWOODHANDLING
EUFINISHING	Pressed board is finished to the final product, packaged, and	08/01/1980 11/14/1995	FGWOODHANDLING

	shipped. Controlled by a Cyclone and Baghouse.		
EUDRYFUEL	Waste material is transferred from FGWOODHANDLING and flake screening areas and delivered as dry fuel to the wood burners in EUCOEN and EUDRYER1 through EUDRYER4. This system is controlled by a cyclone and baghouse.	08/01/1980	FGWOODHANDLING
EUCLEANUP	Cleanup system for screens and dry bins area. This is a pneumatic system with dust pickups, servicing screens, conveyors, dry bins, and associated equipment for housekeeping purposes. Controlled by a Baghouse and Enclosure.	01/01/1992	FGWOODHANDLING
EUPAINTBOOTH	The paint booth is used to paint the edges of the finished Oriented Strand Board (OSB) product. Particulate is controlled by Paint Filter located in the Paint Booth.	06/01/1987	NA
EUDIESELHOTOIL	Diesel emergency hot oil pump (85 HP)	08/01/1980 07/06/2006	FGDIESEL-ENGINES
EUEMERGENCYGEN	Diesel emergency generator (250 HP)	08/01/1980 09/01/1987	FGDIESEL-ENGINES
EUFIREPUMP	Diesel emergency fire pump (281HP)	08/01/1980	FGDIESEL-ENGINES

Consent orders 17-1991 and 14-1984.
AQD staff has encouraged the permittee to request termination of these consent decrees.

SSMAP
The SSMAP shall be updated.

NAME Gloria Tello DATE 7-25-16 SUPERVISOR