PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

Statement of Basis

Proposed Title V Permit to Operate – Renewal

SierraPine, Rocklin Division

Permit Number S-0001

Issued to:

SierraPine, Rocklin Division
4300 Dominguez Rd.
Rocklin, CA 95677

Issued by:

Placer County Air Pollution Control District
3091 County Center Drive, Suite 240
Auburn, CA 95603

Proposed:

March 20, 2009

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1. Background

This document supports the District's renewal of the SierraPine, Rocklin Division RB-001 Title V permit. SierraPine, Rocklin Division manufacturers medium density fiber board. It operates under Title V Operating Permit No. S-0001, issued by Placer County Air Pollution Control District ("District") on June 17, 2003. As a major source of NOx, VOC, and CO emissions, a Title V permit is required under District Rule 507 (and 40 CFR Part 70). The Title V permit life is 5 years from date of issue, expiring on June 17, 2008. This document amends the Statement of Basis document that was prepared for the Title V permit which was issued on June 17, 2003.

2. Permit Renewal Evaluation

The District has reviewed State, Federal, and District rules, regulations, and operating permits for applicable requirements for incorporation into the Title V permit renewal.

A. State of California Health and Safety Code

State rules and regulations are contained in the California Health and Safety Code. State requirements, promulgated and amended since the Title V permit issuance of June 17, 2003, that are applicable to SierraPine, Rocklin Division plant operations is limited to the Air Toxic Control Measure for Formaldehyde from Composite Wood Products. Permit condition additions based on this rule are listed in Table 1. No new conditions were added to the Title V permit from this rule because the rule imposes formaldehyde emissions limits from the medium density fiber board product, a consumer product, which is not considered part of the SierraPine, Rocklin Division stationary source operations, and the Air District does not have any direct enforcement responsibilities or compliance oversight for this rule.

B. Placer County Air Pollution Control District Rules

District rules and regulations promulgated or amended since the Title V permit issuance of June 17, 2003, and those which are applicable to SierraPine, Rocklin Division plant operations, are identified in Table 2. Permit condition additions and revisions based on these rules are identified in Table 2.

C. Placer County Air Pollution Control District-Issued Authority to Construct, Permits to Operate

District Permits to Operate and Authorities to Construct issued or amended since the Title V permit issuance, June 17, 2003, include:

- AC-02-100
- AC-02-26, AC-02-38
- AC-03-67
- AC-03-73
- AC-03-03
- AC-04-36
- AC-05-47
- AC-00-43
- SPIN-04-01
- SPIN-00-43
- SPIN-93-05

Table 3 lists each of the permit conditions from the Authority to Construct and Permit to Operate. They identify how they were considered for the Title V permit renewal.

D. Federal

Federal rules and regulations promulgated or amended since the Title V permit issuance, June 17, 2003, applicable to SierraPine, Rocklin Division plant operations include:

- National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products – 40 CFR Part 60 Subpart DDDD
- National Emission Standards for Hazardous Air Pollutatns: Industrial / Commerical / Institutional Boilers and Process Heaters – 40 CFR Part 60 Subpart DDDDD
- Continuous Assurance Monitoring under 40 CFR Part 64 and 40 CFR Part 70.5.

Table 4 lists Title V permit condition additions and modifications resulting from the applicable federal rules and regulations.

The SierraPine Rocklin Division Continuous Assurance Monitoring Plan is provided in Attachment IV.

The SierraPine Rocklin Division Kipper sanderdust boiler falls under the National Emission Standards for Hazardous Air Pollutants for Industrial / Commercial / Institutional Boilers and Process Heaters (Industrial Boiler MACT Rule). The final rule was originally promulgated by U.S. EPA on September 13, 2004. However subsequently, on June 8, 2007, the rule was vacated, and has not yet been re-proposed. The District has decided not to proceed with a case-by-case MACT determination (under CAA Section 112(j)) at this time. We will formally address the MACT rule when it is revised. This is because our preliminary evaluation is that the boiler currently uses controls that are equivalent or beyond a MACT determination for existing wood fired industrial boilers (and substantially better than that determined in the vacated MACT rule). Specifically,

- For control of particulate matter and associated solid condensed air toxics (metals such as chromium, lead, and cadmium), the boiler uses a combination of venturi scrubber and wet electrostatic precipitator, and operates under an effective total PM limit of 0.01 gr/dscf.
- For surrogate control of volatile organic air toxics, the boiler operates under a CO limit of 400 ppmv (on a three hour rolling average), with compliance through a CO CEMS.
- For control of other volatile inorganics (including HCl and Hg) the boiler uses the wet scrubber wet ESP combination.

E. Miscellaneous

Table 5 lists miscellaneous Title V permit renewal changes.

3. Draft Renewed Permit

The proposed Title V Permit to Operate S-0001 renewal is provided in Attachment I. A version of the permit with changes identified with underline / strikeout is provided in Attachment II.

Table 1. California State Air Resources Board Rules

Change	Location in Permit Renewal

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Table 2. New and Amended District Rules

Rule No.	Rule	Date of Adoption or Amendment	SIP Submittal	SIP Approved	Evaluation Finding
216	Organic Solvent Cleaning And Degreasing Operations	12/11/2003	Y	N	No impact on Title V permit. No applicable process or equipment.
225	Wood Burning Appliances	12/13/2007	N	N	No impact on Title V permit. No applicable process or equipment.
228	Fugitive Dust	New 4/10/2003	N	N	**Added Cond. 2.B.8.g, 2.B.8.h, and 3.B.3.** Fugitive dust shall not be generated by active operations such that the dust opacity is visible in the atmosphere beyond the property boundary; and that the fugitive dust have opacity greater than 40%.
232	Biomass Suspension Boilers		Y	N	Section 301.2 establishes a CO emissions limit at 400 ppmv @12% CO_2, on a three-hour average dry basis. **Add this emission limit to Cond. 2.A.1.** CO emissions shall not exceed 400 ppmv @12% CO2, on a three-hour average dry basis
233	Biomass Boilers	10/11/2007	Y	N	SierraPine sanderdust boiler is covered under Rule 232. Rule 233 does not directly apply.
235	Adhesives	4/8/2004	Y	N	No impact on Title V permit. No applicable process or equipment. See Rule 102.2 (definition of business category).
237	Municipal Landfills	10/9/2003	Y	N	No impact on Title V permit. No applicable process or equipment.
238	Factory Coating Of Flat Wood Paneling	2/18/2004	Y	N	No impact on Title V permit. No applicable process or equipment.
239	Graphic Arts Operations	4/8/2004	Y	N	No impact on Title V permit. No applicable process or equipment.
240	Surface Preparation and Cleanup	12/11/2003	Y	N	No impact on Title V permit. No applicable process or equipment.
242	Stationary Internal Combustion Engines	4/10/2003	Y	N	No impact on Title V permit. No applicable process or equipment.
243	Polyester Resin Operations	4/10/2003	Y	N	No impact on Title V permit. No applicable process or equipment.
411	Indemnification of District	New 2/14/2008	N	N	**Added to 4.Q.** SierraPine has an obligation to defend and indemnify the District against third party challenges in accordance with District Rule 411.
412	Agricultural Engine Registration	12/13/2007	N	N	No impact on Title V permit. No applicable process or equipment.
501	General Permit Requirements	12/9/2004	N	N	No impact on Title V permit. No applicable process or equipment.
502	New Source Review	12/9/2004	Y	N	Exempted Temporary Sources at Sec. 114. Does not impact SierraPine operations.
507	Federal Operating Permit Program	4/8/2004	N	N	Revised Sec. 403 to require annual fee for major sources. Already addressed in permit.
514	Federal Major Modifications	10/12/2006	N	N	No impact on Title V permit. Administrative change.
601	Permit Fees	12/13/2007	N	N	No impact on Title V permit. Administrative change for agricultural engines.

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-02-100	--	ADD STORAGE BUILDING BAGHOUSE TO SPIN-84-01	Y	SierraPine did not go through with construction of this baghouse. Delete from Equipment Table 1.B.2.
AC-02-26 AC-02-38	--	THINBOARD REGENERATIVE CATALYTIC OXIDIZER PERMIT AMENDMENT OF VOC POUNDS PER HOUR AND PER QUARTER LIMITATIONS;	N	AC-02-26 was cancelled, and replaced by AC-02-38. No addition/correction to the permit needed. This information in this AC was included in the Title V permit at 2.A.4.
AC-03-67	1	Modify NOx Emission Limits on the MDF RCO from 2.85 lb/hr and 6,283 lb/qtr to 6.83 lb/hr and 15,080 lb/qtr. All Other Conditions of AC-02-64 Remain Unchanged.	Y	Change limits at 2.A.3.a.
AC-03-73 SPIN-04-01	Equipment	Emergency Fire Pump, Engine Mfr: John Deere, Model: 6081, Serial Number: N/A, Fuel Type: Diesel, Power Rating: 360 hp, Turbocharger and Aftercooler, Pump Mfr: Clarke, Model: JW6H-UF60.	Y	Add Fire Pump to Equipment Table at 1.B.1.
AC-03-73 SPIN-04-01	1	1.A non-resettable hour meter shall be installed on the engine/pump set to record the hours of operation.	Y	Add as new condition at 2.C.5.d.
AC-03-73	2	2.Operation for maintenance and testing of the emergency diesel engine and fire pump shall be limited to 100 hours per year.	N	Superceeded by SPIN-00-43 Cond. 2.
SPIN-04-01	2	2.Operation for maintenance and testing of the emergency diesel engine and fire pump shall be limited to 30 hours per year.	Y	Add as new condition at 2.C.5.d.
AC-03-73 SPIN-04-01	3	3.Operation for other than maintenance purposes shall be limited to involuntary interruptions of electrical power. Operation shall not exceed 24 hours without prior authorization by the Air Pollution Control Officer.	Y	Add as new condition at 2.C.5.d.
AC-03-73 SPIN-04-01	4	4. Reporting and Record Keeping: A monthly log shall be kept by the Owner or Operator for a period of three (3) years, and shall be made available to the District's inspector upon request. Information required for reporting to the District includes, but is not limited to: A.The hours of operation the engine was run for maintenance and testing. B.The hours of operation the engine was run during interruption of electrical power. C.The hour meter reading at the start of each calendar year. D.Fuel records including type (CARB diesel), amount purchased, date purchased, and signature of fuel provider indicating fuel was delivered.	Y	Add new condition at 6.B.3 4.a, .b, .c, .d.
AC-03-73 SPIN-04-01	5a	No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.	N	Exists at 3.B.1 (No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.).
AC-03-73 SPIN-04-01	5b	Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, " Visible Emissions ".	N	Exists at 3.A (An emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.)

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-03-73 SPIN-04-01	5c	The particulate emission concentration of the engine exhaust shall not exceed 0.1 grains per dry standard cubic foot of gas, at 60 degrees F., per Rule 210, "Specific Contaminants".	N	Exists at 3.D.1 (In accordance with District Rule 210, Specific Contaminants, particulate matter shall not exceed 0.1 gr/dscf at 12 percent carbon dioxide (CO2) at standard conditions.).
AC-03-73 SPIN-04-01	5d	The emission of sulfur compounds, calculated as sulfur dioxide (SO2) shall not exceed 0.2 percent by volume per Rule 210, "Specific Contaminants".	N	Exists at 3.D.2 (The emission of sulfur compounds, calculated as sulfur dioxide, shall not exceed 0.2 percent by volume, per Rule 210, Specific Contaminants.).
AC-03-73 SPIN-04-01	5e	The emissions from the engine shall not exceed the following rates: CO: 5.5 lb/day; NOx: 107 lb/day; VOC: 2.1 lb/day; SOx: 2.7 lb/day; PM10: 1.3 lb/day	Y	Add new emissions limits at 2.A.8.
AC-03-73	6	Authorization to construct the equipment listed and as prescribed in the approved plans and specifications is hereby granted, subject to the specified permit conditions. The construction and operation of listed equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted in the conditions. Deviation from the approved plans is not permissible without first securing approval for the changes from the Air Pollution Control Officer. (Rule 501)	N	Applies to unit startup only.
AC-03-73	7	This permit shall be maintained on the premises of the subject equipment. (Rule 501)	N	Exists at 3.H.8 (This permit shall be maintained on the premises of the subject equipment. (Rule 501)).
AC-03-73	8	The authorized District agents shall have the right of entry to any premises on which an air pollution emission source is located for the purpose of inspecting such source, including securing samples of emissions therefrom, or any records required to be maintained therewith by the District. (Rule 402)	N	Exists at 4.C (The Regional Administrator, the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted: 1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate; and 2. At reasonable times to have access to, inspect and copy any records required to be kept under the terms and conditions of this Permit to Operate; and 3. To inspect any equipment at the stationary source, operation, work practices, emission related activities or method required in this Permit to Operate; and 4. To sample emissions from the source or other monitoring activities.)
AC-03-73	9	In the event of any violation of the District Rules and Regulations, the company shall take action to end such violation. (Rule 502)	N	Exists at 3.I.1 (In the event of any violation of the District Rules and Regulations, SierraPine shall take action to end such violation.).
AC-03-73	10	The company shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)	N	Exists at 3.F.2 (SierraPine shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance that cause emissions in excess of limits established by District Rules and Regulations. (Rule 404))

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-03-73	11	Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alternations may require an Authority to Construct Permit. (Rule 501)	N	Exists at 3.H.1.b (Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alterations may require an Authority to Construct Permit).
AC-03-73	12	Exceeding any of the limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400.	N	Exists at 3.H.2.b (Exceeding any limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400 and District Rule 507, Title V Permit to Operate, Sections 302.6 and 302.7.)
AC-03-73	13	In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)	N	Exists at 3.H.5.a (In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)).
AC-03-73	14	Compliance of the permitted facility is required with the provisions of the "Air Toxics `Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	N	Exists at 3.H.4 (Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).)
AC-03-73	15	Title V Recordkeeping Requirements: Recordkeeping and reporting pursuant to District Rule 511, Potential To Emit, shall be performed if the facility emissions exceed any of the following in any 12 month period:	N	Not required for operating permit.
		A. 5 tons per year of a regulated air pollutant (excluding HAPs);		
		B. 2 tons per year of a single HAP;		
		C. 5 tons per year of any combination of HAPs;		
		D. 20 percent of any lesser threshold for a single HAP that the United States Environmental Protection Agency (U.S. EPA) may establish by rule.		
AC-03-73	16	Title V Operating Limitations: The Owner/Operator shall file an application pursuant to Rule 512, Request for Synthetic Minor Source Status or Rule 507, Federal Operating Permit Program if the facility emissions exceed any of the following in any 12 month period:	N	Not required for operating permit.
		A. 12.5 tons of nitrogen oxides, 12.5 tons of volatile organic compounds, 50 tons of sulfur oxides, 50 tons of PM-10 or 50 tons of carbon monoxide;		
		B. 5 tons of a single hazardous air pollutant (HAP);		
		C. 12.5 tons of any combination of HAPs;		
		D. 50 percent of any lesser threshold for a single HAP as the U.S. EPA may establish by rule.		

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-03-73	17	Performance Test Requirements: If the District finds that performance tests are required to determine compliance with District Rules and Regulations and Conditions of this Authority to Construct, reasonable written notice shall be provided to the Company. The performance tests shall be subject to the following restrictions:	N	Exists at 6.A.4.a, .b, .c (The District may require the conduct of emissions testing or analysis deemed necessary to demonstrate compliance with applicable requirements. If the District determines that tests are required, a written notice will be provided to SierraPine. Except as otherwise specified in District rules, regulations, or permit conditions the test methods used for determining compliance with emission limits shall be the appropriate method: 1. Adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non vehicular Emission Standards; or 2. Identified in 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or 3. Identified in 40 CFR part 60, Appendix A, Test Methods; or 4. Any alternative method approved by the Air Pollution Control Officer.
		A. At least thirty (30) days prior to the actual testing, a written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used. The prior written approval of the Air Pollution Control Officer is required for the use of alternate test methods.		All required testing shall be subject to the following: 1. A written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used, at least thirty (30) days prior to the actual testing. 2. Independent testing contractors and analytical laboratories shall be Air Resources Board certified to perform the test or analysis conducted. 3. Testing shall be conducted as close as achievable to the maximum process rates or the permitted rates resulting in maximized air pollutant emission rates. 4. The conditions and equipment in operation during testing shall be recorded. 5. Installed instrumentation readings for parameters affecting emission character or extent shall be recorded. 6. The test evaluation results shall be reported to the District within sixty (60) days of testing.).
		B. The District may require, upon reasonable written notice, the conduct by the company of such emissions testing or analysis as may be deemed necessary by the District to demonstrate compliance with District Rules and Regulations and the limiting conditions of this permit.		
		C. Testing shall be conducted in accordance with 40 CFR 60, Appendix A, Methods, or equivalent methods approved by the State of California Air Resources Board (ARB) by reference in Title 17 of the California Administrative Code, or other methods specified by the company and approved in writing by the Air Pollution Control Officer. independent testing contractors and analytical laboratories shall be Air Resources Board certified for the test or analysis conducted. Particulate matter testing, if requested, shall include both filterable and condensed particulate matter (e.g. Method 5 modified to include impinger catch).		
		D. A report of the testing shall be submitted to the District no later than sixty (60) days after the source test is performed.		
AC-03-03	--	MODIFY SPIN-84-04 TO REPLACE REFINERS #1 AND #2	N	AC-03-03 cancelled; replaced by AC-05-47.
AC-04-36	--	MODIFY EXISTING FIBER AND REJECT TRANSFER SYSTEM		

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-04-36	1	Authorization to construct the equipment listed and as prescribed in the approved plans and specifications is hereby granted, subject to the specified permit conditions. The construction and operation of listed equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted in the conditions. Deviation from the approved plans is not permissible without first securing approval for the changes from the Air Pollution Control Officer. (Rule 501)	N	Applies to equipment construction. Not applicable to operating permit.
AC-04-36	2	Written notification shall be submitted to the District no later than seven (7) days after completion of construction. (Rule 501)	N	Applies to equipment consutrction. Not applicable to operating permit.
AC-04-36	3	This permit shall be maintained on the premises of the subject equipment. (Rule 501)	N	Exists at 3.H.8 (This permit shall be maintained on the premises of the subject equipment. (Rule 501)).
AC-04-36	4	The authorized District agents shall have the right of entry to any premises on which an air pollution emission source is located for the purpose of inspecting such source, including securing samples of emissions therefrom, or any records required to be maintained therewith by the District. (Rule 402)	N	Exists at 4.C (The Regional Administrator, the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted: 1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate; and 2. At reasonable times to have access to, inspect and copy any records required to be kept under the terms and conditions of this Permit to Operate; and 3. To inspect any equipment at the stationary source, operation, work practices, emission related activities or method required in this Permit to Operate; and 4. To sample emissions from the source or other monitoring activities.)
AC-04-36	5	In the event of any violation of the District Rules and Regulations, the company shall take action to end such violation. (Rule 502)	N	Exists at 3.I.1 (In the event of any violation of the District Rules and Regulations, SierraPine shall take action to end such violation.).
AC-04-36	6	The company shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)	N	Exists at 3.F.2 (SierraPine shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance that cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)).
AC-04-36	7	Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alternations may require an Authority to Construct Permit. (Rule 501)	N	Exists at 3.H.1.b (Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alterations may require an Authority to Construct Permit).
AC-04-36	8	Exceeding any of the limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400.	N	Exists at 3.H.2.b (Exceeding any limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400 and District Rule 507, Title V Permit to Operate, Sections 302.6 and 302.7.).

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-04-36	9	In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)	N	Exists at 3.H.5.a (In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501))
AC-04-36	10	Title V Operating Limitations: The Owner/Operator shall file an application pursuant to Rule 512, Request for Synthetic Minor Source Status or Rule 507, Federal Operating Permit Program if the facility emissions exceed any of the following in any 12 month period:	N	Not required for operating permit.
		A. 12.5 tons of nitrogen oxides, 12.5 tons of volatile organic compounds, 50 tons of sulfur oxides, 50 tons of PM-10 or 50 tons of carbon monoxide;		
		B. 5 tons of a single hazardous air pollutant (HAP);		
		C. 12.5 tons of any combination of HAPs;		
		D. 50 percent of any lesser threshold for a single HAP as the U.S. EPA may establish by rule.		
AC-04-36	11	Performance Test Requirements : If the District finds that performance tests are required to determine compliance with District Rules and Regulations and Conditions of this Authority to Construct, reasonable written notice shall be provided to the Company. The performance tests shall be subject to the following restrictions:	N	Exists at 6.A.4.a, .b, .c (The District may require the conduct of emissions testing or analysis deemed necessary to demonstrate compliance with applicable requirements. If the District determines that tests are required, a written notice will be provided to SierraPine. Except as otherwise specified in District rules, regulations, or permit conditions the test methods used for determining compliance with emission limits shall be the appropriate method: 1. Adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non vehicular Emission Standards; or 2. Identified in 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or 3. Identified in 40 CFR part 60, Appendix A, Test Methods; or 4. Any alternative method approved by the Air Pollution Control Officer.
AC-04-36	11a	At least thirty (30) days prior to the actual testing, a written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used. The prior written approval of the Air Pollution Control Officer is required for the use of alternate test methods	N	All required testing shall be subject to the following: 1. A written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used, at least thirty (30) days prior to the actual testing. 2. Independent testing contractors and analytical laboratories shall be Air Resources Board certified to perform the test or analysis conducted. 3. Testing shall be conducted as close as achievable to the maximum process rates or the permitted rates resulting in maximized air pollutant emission rates. 4. The conditions and equipment in operation during testing shall be recorded. 5. Installed instrumentation readings for parameters affecting emission character or extent shall be recorded. 6. The test evaluation results shall be reported to the District within sixty (60) days of testing.)
AC-04-36	11b	The District may require, upon reasonable written notice, the conduct by the company of such emissions testing or analysis as may be deemed necessary by the District to demonstrate compliance with District Rules and Regulations and the limiting conditions of this permit	N	

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-04-36	11c	Testing shall be conducted in accordance with 40 CFR 60, Appendix A, Methods, or equivalent methods approved by the State of California Air Resources Board (ARB) by reference in Title 17 of the California Administrative Code, or other methods specified by the company and approved in writing by the Air Pollution Control Officer. independent testing contractors and analytical laboratories shall be Air Resources Board certified for the test or analysis conducted. Particulate matter testing, if requested, shall include both filterable and condensed particulate matter (e.g. Method 5 modified to include impinger catch).	N	[illegible]
AC-04-36	11d	A report of the testing shall be submitted to the District no later than sixty (60) days after the source test is performed.	N	
AC-05-47	--	MODIFY SPIN-84-04 TO REPLACE REFINERS #1 AND #2		
AC-05-47	1	The wood fiber throughput of the dryers remains unchanged as a result of the replacement of the #1 and #2 Refiners at: A. 60,000 pounds/hr combined for three dryers.	Y	Exists at 2.C.2, amend authority to "AC-05-47".
AC-05-47	2	An initial compliance test after the completion of startup for Refiner #1 shall be conducted within 180 days for VOCs, formaldehyde, and PM-10. The initial compliance test shall be conducted on the outlet of the Regenerative Oxidizer.	N	Applies to startup only.
AC-05-47	3	Testing for VOCs shall be conducted in accordance with 40 CFR 60, Appendix A, Method 25A, or South Coast AQMD Test Methods 25.1 and 25.3, or equivalent methods as required by the District. The test plan must be approved by the District prior to the test.	N	Exists at 6.D.3.b (Testing for VOCs shall be conducted in accordance with 40 CFR 60, Appendix A, Method 25A, or South Coast AQMD Test Methods 25.1 and 25.3, or equivalent methods as required by the District.).
AC-05-47	4	Testing for formaldehyde and PM-10 shall be conducted in accordance with 40 CFR 60, Appendix A, Methods, or equivalent methods approved by the State of California Air Resources Board (ARB) by reference in Title 17 of the California Administrative Code, or other methods specified by the company and approved in writing by the Air Pollution Control Officer. Independent testing contractors and analytical laboratories shall be Air Resources Board certified for the test or analysis conducted. Particulate matter testing, if requested, shall include both filterable and condensed particulate matter.	N	Applies to startup only; exists at 6.A.4.b.

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-05-47	5	Authorization to construct the equipment listed and as prescribed in the approved plans and specifications is hereby granted, subject to the specified permit conditions. The construction and operation of listed equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted in the conditions. Deviation from the approved plans is not permissible without first securing approval for the changes from the Air Pollution Control Officer. (Rule 501)	N	Applies to startup only.
AC-05-47	6	Written notification shall be submitted to the District no later than seven (7) days after completion of construction. (Rule 501)	N	Applies to startup only.
AC-05-47	7	This permit shall be maintained on the premises of the subject equipment. (Rule 501)	N	Exists at 3.H.8 (This permit shall be maintained on the premises of the subject equipment. (Rule 501)).
AC-05-47	8	The authorized District agents shall have the right of entry to any premises on which an air pollution emission source is located for the purpose of inspecting such source, including securing samples of emissions therefrom, or any records required to be maintained therewith by the District. (Rule 402)	N	Exists at 4.C (The Regional Administrator, the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted: 1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate; and 2. At reasonable times to have access to, inspect and copy any records required to be kept under the terms and conditions of this Permit to Operate; and 3. To inspect any equipment at the stationary source, operation, work practices, emission related activities or method required in this Permit to Operate; and 4. To sample emissions from the source or other monitoring activities.)
AC-05-47	9	In the event of any violation of the District Rules and Regulations, the company shall take action to end such violation. (Rule 502)	N	Exists at 3.I.1 (In the event of any violation of the District Rules and Regulations, SierraPine shall take action to end such violation.).
AC-05-47	10	The company shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)	N	Exists at 3.F.2 (SierraPine shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance that cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)).
AC-05-47	11	Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alternations may require an Authority to Construct Permit. (Rule 501)	N	Exists at 3.H.1.b (Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alterations may require an Authority to Construct Permit).
AC-05-47	12	Exceeding any of the limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400.	N	Exists at 3.H.2.b (Exceeding any limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400 and District Rule 507, Title V Permit to Operate, Sections 302.6 and 302.7.).

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-05-47	13	In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)	N	Exists at 3.H.5.a (In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)).
AC-05-47	14	Compliance of the permitted facility is required with the provisions of the "Air Toxics `Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	N	Exists at 3.H.4 (Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).).
AC-05-47	15	Title V Recordkeeping Requirements: Recordkeeping and reporting pursuant to District Rule 511, Potential To Emit, shall be performed if the facility emissions exceed any of the following in any 12 month period:	N	Not required for Title V operating permit.
		A. 5 tons per year of a regulated air pollutant (excluding HAPs);		
		B. 2 tons per year of a single HAP;		
		C. 5 tons per year of any combination of HAPs;		
		D. 20 percent of any lesser threshold for a single HAP that the United States Environmental Protection Agency (U.S. EPA) may establish by rule.		
AC-05-47	16	Title V Operating Limitations: The Owner/Operator shall file an application pursuant to Rule 512, Request for Synthetic Minor Source Status or Rule 507, Federal Operating Permit Program if the facility emissions exceed any of the following in any 12 month period:	N	Not required for Title V operating permit.
		A. 12.5 tons of nitrogen oxides, 12.5 tons of volatile organic compounds, 50 tons of sulfur oxides, 50 tons of PM-10 or 50 tons of carbon monoxide;		
		B. 5 tons of a single hazardous air pollutant (HAP);		
		C. 12.5 tons of any combination of HAPs;		
		D. 50 percent of any lesser threshold for a single HAP as the U.S. EPA may establish by rule.		

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-05-47	17	Performance Test Requirements: If the District finds that performance tests are required to determine compliance with District Rules and Regulations and Conditions of this Authority to Construct, reasonable written notice shall be provided to the Company. The performance tests shall be subject to the following restrictions:	N	Exists at 6.A.4.a, .b, .c (The District may require the conduct of emissions testing or analysis deemed necessary to demonstrate compliance with applicable requirements. If the District determines that tests are required, a written notice will be provided to SierraPine. Except as otherwise specified in District rules, regulations, or permit conditions the test methods used for determining compliance with emission limits shall be the appropriate method: 1. Adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non vehicular Emission Standards; or 2. Identified in 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or 3. Identified in 40 CFR part 60, Appendix A, Test Methods; or 4. Any alternative method approved by the Air Pollution Control Officer.
		A. At least thirty (30) days prior to the actual testing, a written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used. The prior written approval of the Air Pollution Control Officer is required for the use of alternate test methods.		All required testing shall be subject to the following: 1. A written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used, at least thirty (30) days prior to the actual testing. 2. Independent testing contractors and analytical laboratories shall be Air Resources Board certified to perform the test or analysis conducted. 3. Testing shall be conducted as close as achievable to the maximum process rates or the permitted rates resulting in maximized air pollutant emission rates. 4. The conditions and equipment in operation during testing shall be recorded. 5. Installed instrumentation readings for parameters affecting emission character or extent shall be recorded. 6. The test evaluation results shall be reported to the District within sixty (60) days of testing.)
		B. The District may require, upon reasonable written notice, the conduct by the company of such emissions testing or analysis as may be deemed necessary by the District to demonstrate compliance with District Rules and Regulations and the limiting conditions of this permit.		
		C. Testing shall be conducted in accordance with 40 CFR 60, Appendix A, Methods, or equivalent methods approved by the State of California Air Resources Board (ARB) by reference in Title 17 of the California Administrative Code, or other methods specified by the company and approved in writing by the Air Pollution Control Officer. independent testing contractors and analytical laboratories shall be Air Resources Board certified for the test or analysis conducted. Particulate matter testing, if requested, shall include both filterable and condensed particulate matter (e.g. Method 5 modified to include impinger catch).		
		D. A report of the testing shall be submitted to the District no later than sixty (60) days after the source test is performed.		
AC-00-43 SPIN-00-43	--	EMERGENCY GENERATOR	Y	Add Emergency Generator to Equipment Table at 1.B.
AC-00-43 SPIN-00-43	1	1.A non-resettable hour meter shall be installed on the engine/generator set to record the hours of operation.	Y	Add as new condition at 2.C.5.d.
AC-00-43	2	2.Operation for maintenance and testing of the emergency diesel engine and generator shall be limited to 100 hours per year.	N	Superceeded by SPIN-00-43 Cond. 2

Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
SPIN-00-43	2	2.Operation for maintenance and testing of the emergency diesel engine and generator shall be limited to 20 hours per year.	Y	Add as new condition at 2.C.5.d.
AC-00-43 SPIN-00-43	3	3.Operation for other than maintenance purposes shall be limited to involuntary interruptions of electrical power. Operation shall not exceed 24 hours without prior authorization by the Air Pollution Control Officer.	Y	Add as new condition at 2.C.5.d.
AC-00-43 SPIN-00-43	4	4. Reporting and Record Keeping: A monthly log shall be kept by the Owner or Operator for a period of three (3) years, and shall be made available to the District's inspector upon request. Information required for reporting to the District includes, but is not limited to: A. The hours of operation the engine was run for maintenance and testing. B. The hours of operation the engine was run during interruption of electrical power. C. The hour meter reading at the start of each calendar year. D. Fuel records including type (CARB diesel), amount purchased, date purchased, and signature of fuel provider indicating fuel was delivered.	Y	Add new condition at 2.C.6.
AC-00-43 SPIN-00-43	5a	No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.	N	Exists at 3.B.1 (No emissions are permitted, from any source, which are a nuisance per District Rule 205, Nuisance.).
AC-00-43 SPIN-00-43	5b	Stack emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, " Visible Emissions ".	N	Exists at 3.A (An emission opacity as dark or darker than Ringelmann No. 1 (20% opacity) for a period or periods aggregating more than three (3) minutes in any one hour is prohibited and is in violation of District Rule 202, Visible Emissions.)
AC-00-43 SPIN-00-43	5c	The particulate emission concentration of the engine exhaust shall not exceed 0.1 grains per dry standard cubic foot of gas, at 60 degrees F., per Rule 210, "Specific Contaminants".	N	Exists at 3.D.1 (In accordance with District Rule 210, Specific Contaminants, particulate matter shall not exceed 0.1 gr/dscf at 12 percent carbon dioxide (CO2) at standard conditions.).
AC-00-43 SPIN-00-43	5d	The emission of sulfur compounds, calculated as sulfur dioxide (SO2) shall not exceed 0.2 percent by volume per Rule 210, "Specific Contaminants".	N	Exists at 3.D.2 (The emission of sulfur compounds, calculated as sulfur dioxide, shall not exceed 0.2 percent by volume, per Rule 210, Specific Contaminants.).
AC-00-43 SPIN-00-43	5e	The emissions from the engine shall not exceed the following rates: CO: 21 lb/day; NOx: 60 lb/day; VOC: 1 lb/day; SOx: 11 lb/day; PM10: 9 lb/day	Y	Add new emissions limits at 2.A.9.

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-00-43	GC 1	Authorization to construct the equipment listed and as prescribed in the approved plans and specifications is hereby granted, subject to the specified permit conditions. The construction and operation of listed equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted in the conditions. Deviation from the approved plans is not permissible without first securing approval for the changes from the Air Pollution Control Officer. (Rule 501)	N	Applies to startup only.
AC-00-43	GC 2	Written notification shall be submitted to the District no later than seven (7) days after completion of construction. (Rule 501)	N	Applies to construction only.
AC-00-43	GC 3	This permit shall be maintained on the premises of the subject equipment. (Rule 501)	N	Exists at 3.H.8 (This permit shall be maintained on the premises of the subject equipment. (Rule 501)).
AC-00-43	GC 4	The authorized District agents shall have the right of entry to any premises on which an air pollution emission source is located for the purpose of inspecting such source, including securing samples of emissions therefrom, or any records required to be maintained therewith by the District. (Rule 402)	N	Exists at 4.C (The Regional Administrator, the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted: 1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate; and 2. At reasonable times to have access to, inspect and copy any records required to be kept under the terms and conditions of this Permit to Operate; and 3. To inspect any equipment at the stationary source, operation, work practices, emission related activities or method required in this Permit to Operate; and 4. To sample emissions from the source or other monitoring activities.)
AC-00-43	GC 5	In the event of any violation of the District Rules and Regulations, the company shall take action to end such violation. (Rule 502)	N	Exists at 3.I.1 (In the event of any violation of the District Rules and Regulations, SierraPine shall take action to end such violation.)
AC-00-43	GC 6	The company shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance which cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)	N	Exists at 3.F.2 (SierraPine shall notify the District within two hours of any upset conditions, breakdown or scheduled maintenance that cause emissions in excess of limits established by District Rules and Regulations. (Rule 404)).
AC-00-43	GC 7	Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alternations may require an Authority to Construct Permit. (Rule 501)	N	Exists at 3.H.1.b (Any alteration of the subject equipment, including a change in the method of operation, shall be reported to the District. Such alterations may require an Authority to Construct Permit).
AC-00-43	GC 8	Exceeding any of the limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400.	N	Exists at 3.H.2.b (Exceeding any limiting condition is prohibited without prior application for, and the subsequent granting of a permit modification pursuant to District Rule 501, General Permit Requirements, Section 400 and District Rule 507, Title V Permit to Operate, Sections 302.6 and 302.7.).

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-00-43	GC 9	In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501)	N	Exists at 3.H.5.a (In the event of a change of ownership, an application must be submitted to the District. Upon any change in control or ownership of facilities constructed, operated, or modified under authority of this permit, the requirements contained in this Authority to Construct shall be binding on all subsequent owners and operators.(Rule 501))
AC-00-43	GC 10	Compliance of the permitted facility is required with the provisions of the "Air Toxics `Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).	N	Exists at 3.H.4 (Compliance of the permitted facility is required with the provisions of the "Air Toxics 'Hot Spots' Information and Assessment Act" of 1987 (Health and Safety Code Sections 44300 et seq.).)
AC-00-43	GC 11	Title V Recordkeeping Requirements: Recordkeeping and reporting pursuant to District Rule 511, Potential To Emit, shall be performed if the facility emissions exceed any of the following in any 12 month period:	N	Not required for operating permit.
		A. 5 tons per year of a regulated air pollutant (excluding HAPs);		
		B. 2 tons per year of a single HAP;		
		C. 5 tons per year of any combination of HAPs;		
		D. 20 percent of any lesser threshold for a single HAP that the United States Environmental Protection Agency (U.S. EPA) may establish by rule.		
AC-00-43	GC 12	Title V Operating Limitations: The Owner/Operator shall file an application pursuant to Rule 512, Request for Synthetic Minor Source Status or Rule 507, Federal Operating Permit Program if the facility emissions exceed any of the following in any 12 month period:	N	Not required for operating permit.
		A. 12.5 tons of nitrogen oxides, 12.5 tons of volatile organic compounds, 50 tons of sulfur oxides, 50 tons of PM-10 or 50 tons of carbon monoxide;		
		B. 5 tons of a single hazardous air pollutant (HAP);		
		C. 12.5 tons of any combination of HAPs;		
		D. 50 percent of any lesser threshold for a single HAP as the U.S. EPA may establish by rule.		

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Table 3. District Permit-to-Operate and Authority to Construct

Permit No.	Condition No.	Condition Language	Add or Amend Permit Renewal	Evaluation Finding
AC-00-43	GC13	Performance Test Requirements: If the District finds that performance tests are required to determine compliance with District Rules and Regulations and Conditions of this Authority to Construct, reasonable written notice shall be provided to the Company. The performance tests shall be subject to the following restrictions:	N	Exists at 6.A.4.a, .b, .c (The District may require the conduct of emissions testing or analysis deemed necessary to demonstrate compliance with applicable requirements. If the District determines that tests are required, a written notice will be provided to SierraPine. Except as otherwise specified in District rules, regulations, or permit conditions the test methods used for determining compliance with emission limits shall be the appropriate method: 1. Adopted by the California Air Resources Board and cited in Title 17, California Code of Regulations, Division 3, Subchapter 8, Compliance with Non vehicular Emission Standards; or 2. Identified in 40 CFR part 50, Appendix M, Recommended Test Methods for State Implementation Plans; or 3. Identified in 40 CFR part 60, Appendix A, Test Methods; or 4. Any alternative method approved by the Air Pollution Control Officer.
		A. At least thirty (30) days prior to the actual testing, a written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used. The prior written approval of the Air Pollution Control Officer is required for the use of alternate test methods.		All required testing shall be subject to the following: 1. A written test plan shall be submitted to the Air Pollution Control Officer detailing the sampling methods, analytical methods or detection principles to be used, at least thirty (30) days prior to the actual testing. 2. Independent testing contractors and analytical laboratories shall be Air Resources Board certified to perform the test or analysis conducted. 3. Testing shall be conducted as close as achievable to the maximum process rates or the permitted rates resulting in maximized air pollutant emission rates. 4. The conditions and equipment in operation during testing shall be recorded. 5. Installed instrumentation readings for parameters affecting emission character or extent shall be recorded. 6. The test evaluation results shall be reported to the District within sixty (60) days of testing.)
		B. The District may require, upon reasonable written notice, the conduct by the company of such emissions testing or analysis as may be deemed necessary by the District to demonstrate compliance with District Rules and Regulations and the limiting conditions of this permit.		
		C. Testing shall be conducted in accordance with 40 CFR 60, Appendix A, Methods, or equivalent methods approved by the State of California Air Resources Board (ARB) by reference in Title 17 of the California Administrative Code, or other methods specified by the company and approved in writing by the Air Pollution Control Officer. independent testing contractors and analytical laboratories shall be Air Resources Board certified for the test or analysis conducted. Particulate matter testing, if requested, shall include both filterable and condensed particulate matter (e.g. Method 5 modified to include impinger catch).		
		D. A report of the testing shall be submitted to the District no later than sixty (60) days after the source test is performed.		
SPIN-93-05	Equip 1	TANK STORAGE	Y	Equipment permit is not listed. Add Tank Storage equipment to Table 1.B.

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Table 4. 40 CFR Part 60 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

Rule Section	Condition Language	Location in Permit Renewal
63.224	Control systems on the MDF (TMDF) press and tube dryers must comply with, one of the following options: Reduce emission of total HAP, measured as THC (as carbon), by 90 percent); or Limit total HAP emissions, measured as THC (as carbon), to 20 ppmv, dry; or Reduce methanol emissions by 90 percent; or Limit methanol emissions to less than 1 ppmv if uncontrolled emissions are greater than 10 ppmvd; or Reduce formaldehyde emissions by 90 percent; or Limit formaldehyde emissions to less than 1 ppmvd if uncontrolled emissions are greater than 10 ppmvd.	2.A.4.c 2.A.3.c
63.224	For the MDF (TMDF) press vent enclosure, the fugitive gas emissions capture device must be demonstrated, upon physical modification to the enclosure, to show either: Capture device has capture efficiency of greater than 90 percent; or Meets the definition of wood products enclosure in 40 CFR Section 63.2292	2.B.6.b, 2.B.11.a
63.2250(b)	SierraPine must be operated and maintained, including air pollution control and monitoring equipment, according to 40 CFR Section 63.6(e)(3).	3.L.4
63.2250(c)	a. SierraPine must be operated and maintained, including air pollution control and monitoring equipment, according to 40 CFR Section 63.6(e)(3). b. SierraPine must develop and comply with a written Startup, Shutdown, and Malfunction Plan, according to 40 CFR Section 63.6(e)(3)	3.M.4
Table 2 to Subpart DDDD of Part 63 – Operating requirements	For the MDF and TMDF ROs, the 3 hour block average RO temperature must be maintained above the minimum temperature established during the most recent performance test; or within the alternative temperature limits specified in this permit. Additionally, when operating in catalytic mode, the activity level of a representative sample of the catalyst must be checked at least every 12 months, and necessary corrective action taken to ensure that the catalyst is performing within its design range.	6.D.5.a
63.2262(l)	For the MDF (TMDF) RO, the minimum operating temperature is determined from the average of the three (3) minimum 15-minute block average RO temperatures that are achieved during the three (3) source test runs from the most recent performance source test that is compliant with all permit emission limits. The temperature limit is effective after District written approval of the most recent performance source test report. For operation in catalytic and thermal modes, operating temperature limits must be separately determined. As an alternative, the MDF (TMDF) (RO) may be operated at a minimum temperature of 1400 degrees F when operating in thermal mode, or operated in the range of 800-1,350 degrees F when operating in catalytic mode.	2.B.3.c, 2.B.4.d
63.2282(e)	For MDF and TMDF RCOs, if operating in catalytic mode, records must be kept of results of the annual catalyst activity check, and corrective actions taken.	6.A.3.d
63.2269(b)	For the MDF and TMDF RO temperature monitors: (1) Electronic calibration must be conducted on semi-annually according to procedures in the manufacturer's owners manual; (2) After the electronic calibration, validation check must be conducted using a second temperature sensor placed nearby the process sensor, which must read within 30F of the process sensor; (3) Monitors must have a minimum accuracy of 4F or 0.75 percent of the temperature value, which ever is larger; (4) Calibration and verification checks must be conducted any time the sensor exceeds the manufacturer's specified maximum operating temperature range; (5) Inspection must be conducted, on a quarterly basis, of all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.	6.D.5.b
63.2270(d)	For MDF and TMDF RCO temperatures, 3 hour clock block averages must be determined as the average of evenly spaced readings in the previous 3 operating hours.	6.B.3.b
63.2262 and Table 4	Biennial performance testing for compliance with the requirements identified 40 CFR §63 Table 1B Subpart DDDD shall be conducted using methods in 40 CFR §63 Table 4 Subpart DDDD.	6.A.4.d
	Annual performance testing for compliance with the total hydrocarbon limit shall be conducted using EPA Method 25A. Methane may be measured using EPA Method 18, and subtracted from the total hydrocarbons.	6.A.4.e

Table 4. 40 CFR Part 60 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products

	Performance testing for compliance with the capture efficiency limit shall be conducted within 180 days of any physical modification to the enclosure using EPA Method 204 or the tracer gas method contained in Appendix B to 40 CFR §63 Subpart DDDD.	6.D.4.f

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Table 5. Miscellaneous Changes

Change	Location in Permit Renewal
For Sanderdust Boiler, change "Marble Bed Scrubbers" to "Venturi Rod Scrubbers".	Table 1.B.2
Add Resin Tank, Scavenger Tank, Wax Storage Tank to equipment list.	Table 1.B.2
Clarify that portable equipment that are exempt from District or State rules and regulations are exempt from Title V permitting	1.D.4
Correct NOx emission limits for MDF RO to 15080 lb/qtr and 6.83 lb/hr, consistent with District permit	2.A.3
Delete Conditions 2.B.1.a, 2.B.1.c and 2.B.1.d. These are redundant to Condition 2.B.1.b.	2.B.1.a, .c and .d
Add conditions from Fugitive Dust District Rule 228	2.B.8.g, .h, 3.B.3
Delete condition relating to Storage Building Baghouse. Equipment never built.	2.B.11
For emergency fire pump engine, lowered allowable maintenance and testing operating hours to 20 per year and added requirement for "non-resettable hour meter". Based on ARB ATCM for Stationary Diesel Engines.	2.C.5
Delete Conditions 2.B.3.b and .c -- replaced with new RO temperature limit of Condition 2.B.2.c based on PWC MACT rule	2.B.3.b, c.
Change Condition 3.F.2 to read "SierraPine shall notify the District ~~within 2 hours~~ as soon as reasonably possible, but no later than two hours after it's detection during normal business hours of any upset conditions, breakdown or schedule maintenance that cause emissions in excess of limits established by District Rules and Regulations. (Rule 404).	3.F.2
Add requirements for operation of Portable Equipment and Engines.	3.N
Change of District address	4.M
Delete Condition 5.D. This refers to Boiler Modes of Operation. This permit was cancelled.	5.D
Delete Condition 6.D.4.b as now replaced with PWC MACT rule temperature limits of Condition 2.B.2.c	6.D.4.b
Condition 6.A.4.a authority was incorrectly specified as Rule 502§303; it is changed to Rule 501§304.	6.A.4a
Add Condition requiring compliance with Compliance Assurance Monitoring plan.	6.D.6

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Attachment I

Proposed Title V Operating Permit S-0001