

**AMADOR AIR DISTRICT
TITLE V OPERATING PERMIT**

ISSUED TO: SierraPine - Ampine Division

Facility Location: 11300 Ridge Road, Martell, California

Permit Number: Title V - 03

Permit Issuance Date: December 1, 2011 (2nd Permit Renewal)
October 22, 2006 (1st Permit Renewal)
October 22, 2001 (Initial Permit)

Permit Expiration Date: December 1, 2016

**Date of Most
Recent Revision:** N/A

Application Received: 2nd Permit Renewal: April 4, 2011
1st Permit Renewal: April 18, 2006
Initial Permit: April 05, 1996, Addendums dated
August 17, 2000 and June 5, 2001

Nature of Business: Wood Products - Particleboard Sheet Manufacture

Primary SIC: 2493

Responsible Official: Orville Shockey, General Manager

Facility Contact: Dave Scott, EH & S Manager
Phone: (209) 223-1690

Approved for Issuance by:

Michael E. Boitano, Air Pollution Control Officer
Amador Air District

December 1, 2011

AMADOR AIR DISTRICT

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SierraPine - Ampine Division

Title V Permit No.: Title V-03
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LIST OF ABBREVIATIONS USED IN THIS PERMIT

AAD	Amador Air District
BDT	Bone dry ton
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EU	Emissions Unit
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MC	Moisture content
MMBTU	Million British thermal units
MSF	Thousand square feet
MSF(3/4)	Thousand square feet particleboard on 3/4 finished basis
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standard
NO _x	Oxides of nitrogen
O ₂	Oxygen
O&M	Operation & Maintenance
PCD	Pollution Control Device
PCWP	Plywood and Composite Wood Products
PM	Particulate matter
PM ₁₀	Particulate matter less than or equal to 10 microns in size
ppm	Parts per million
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
US EPA	United States Environmental Protection Agency
VE	Visible Emissions
VOC	Volatile Organic Compound

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I. FACILITY DESCRIPTION

The Ampine Division of SierraPine is located at 11300 Ridge Road in Martell, California. Ampine manufactures particleboard sheet for the construction industry (SIC 2493) for distribution throughout the United States. Process equipment located at this facility includes a natural gas fired boiler, gas turbine with duct burner, a wood fired process heater, pneumatic sawdust and chip handling systems, furnish drying and screening systems, resin mixing equipment, particleboard pressing, cooling and turning systems and particleboard trimming and sanding equipment.

Air emissions from the particleboard manufacturing process result principally from:

Process	Resulting Air Emissions
1. Screening, milling, and conveying furnish products prior to particleboard production.	Particulate matter (PM) - air pollution control equipment consisting of both cyclones and baghouses are used to control PM.
2. Combustion of natural gas to supply heat for drying and sheet pressing operations and to produce electricity.	VOC, NO _x , SO _x , PM and CO emissions.
3. Drying furnish and mixing, sheet pressing and cooling resins used in particleboard material bonding.	VOC and Hazardous Air Pollutants (HAP) - a biofilter is used to control HAP emissions from the particleboard pressing operation.
4. Finish sanding and sawing of the particleboard.	Particulate matter - air pollution control equipment consisting of both cyclones and baghouses are used to control PM.

The facility is considered a federal major source of air pollutants due to its potential to emit greater than 100 tons per year of particulate matter and greater than 10 tons per year of a single HAP.

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**II. EQUIPMENT UNIT (EU) AND
POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION**

Emission Unit Description	EU ID	Air Pollution Control Equipment	PCD ID
Vericor Gas Turbine, 41 MMBTU/hour with Eclipse Duct Burner, 15 MMBTU/hour, natural gas fuel	GT-01	N/A	-
Boiler #3, 108 MMBTU/hour, natural gas fuel	BO-01	N/A	-
ROEMCC Process Heater, 40 MMBTU/hour, wood fired, natural gas startup fuel	RO-01	Exhausts through dryers using their associated baghouses for particulate matter control.	-
Primary Truck Dump	EU-01	N/A	-
Columbia Portable Truck Dump	EU-02	N/A	-
Outside Wood Storage	EU-03	N/A	-
Wood Fiber Storage Building	EU-04	N/A	-
PAL	EU-05	Pal Baghouse	BH-01
Pre-mix Dryer Grinder and Feed System/Cyclone	EU-06	N/A	-
Pre-mix Dryer #1 System/Cyclone	EU-07	N/A	-
Face Primary Screening System	EU-08	Face Primary Screening Baghouse	BH-02
Face Bauer Mill (Secondary Hammermill) System	EU-09	Face Secondary (milling) Hammermills Baghouse	BH-03
Face Secondary Screening	EU-10	N/A	-
Face Dryer System/Cyclone	EU-11	N/A	-
Core Primary Screening System	EU-12	Core Primary Screening Baghouse	BH-04
Core Primary Refining - North Hammermill System	EU-13	North Hammermill Baghouse	BH-05
Core Primary Refining - South Hammermill System	EU-14	South Hammermill Baghouse	BH-06
Core Secondary Refining Bauer Mills/Cyclone(s)	EU-15	E6 & E7 Bauer Baghouse(s)	BH-07
Core Accepts Silo System	EU-16	Core Accepts Silo Baghouse	BH-08
Core Dryer Feed System	EU-17	Core Dryer(s) Feed System Baghouse	BH-09
Core Dryer No. 1 System/Cyclone	EU-18	N/A	-
Core Dryer No. 2 System/Cyclone	EU-19	N/A	-

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**II. EQUIPMENT UNIT (EU) AND
POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION
(continued)**

Emission Unit Description	EU ID	Air Pollution Control Equipment	PCD ID
Particleboard Blending and Forming	EU-20	N/A	-
Particleboard Press	EU-21	MEC Baghouses (North and South) and PPC Biofilter	BH-10/ BH-11/BF-01
Particleboard Cooling (2-vents)	EU-22	N/A	-
Primary Particleboard Sawing System	EU-23	Primary Sawing/Reclaim system BH to Reclaim silo BH	BH-12/BH-13
Secondary Particleboard Sawing System	EU-24	Secondary (Cut-up) Saw/Reclaim (MJ) BH to Silo BH	BH-14/BH-13
Particleboard Reclaiming System	EU-25	Mat Reject System Reclaim Silo Baghouse	BH-15
Primary Particleboard Sanding System	EU-26	Primary Sanding WP Baghouse	BH-16
Finish Particleboard Sanding System	EU-27	Finish Sanding - South Sanderdust Baghouse	BH-17
		Finish Sanding - North Sanderdust Baghouse	BH-18
Sanderdust Silo System	EU-28	Sanderdust Silo Baghouse	BH-19
Sanderdust Recycle System/Cyclone	EU-29	N/A	-
IC Engine, Emergency Use, Fire Pump, Diesel fueled	DP-01	N/A	-

III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS

The following emission limitations and conditions of operation are based on AAD Rules approved in the SIP, federal NSPS and NESHAP regulations, and AAD Authority to Construct and Permits to Operate for the facility.

A. PARTICULATE MATTER:

1. No source shall discharge particulate matter in excess of 0.1 grains per dry standard cubic foot (dscf) of exhaust gas, excluding sources emitting combustion contaminants only.
This emission limit applies to all point sources at the facility except Boiler #3 (BO-01), the Vericor Gas Turbine with Duct Burner (GT-01), and the ROEMMC Process Heater (RO-01) startup vent which emit combustion contaminants only.
[Basis: AAD Rule 207]
2. No combustion contaminant source shall discharge particulate matter in excess of 0.1 grains per dry standard cubic foot (dscf) calculated at 12 percent CO₂.
This emission limit applies only to Boiler #3 (BO-01), the Vericor Gas Turbine with Duct Burner (GT-01) and the ROEMMC Process Heater (RO 01).
[Basis: SIP Approved AAD Rule 210]
3. No source shall discharge particulate matter at a rate greater than that allowed in AAD Rule 212 Process Weight Table. The rate will be based on the annual throughput report of average tons per hour of material through the press.
This emission limit does not apply to the ROEMMC process heater (RO-01) as stated in SIP Approved AAD Rule 13.A.6.
[Basis: SIP Approved AAD Rule 13 and Rule 14]

B. SULFUR COMPOUNDS

No source shall discharge sulfur compounds, calculated as sulfur dioxide (SO₂), in excess of 2000 parts per million by volume (0.2%) of exhaust gas.
This emission limit applies to boiler #3 (BO-01), the Vericor Gas Turbine with Duct Burner (GT-01), and the ROEMMC Process Heater (RO-01).
[Basis: SIP Approved AAD Rule 11]

C. FUEL BURNING EQUIPMENT

No source shall discharge sulfur compounds in excess of 200 pounds per hour calculated as sulfur dioxide (SO₂); nitrogen oxides in excess of 140 pounds per hour calculated as nitrogen dioxide (NO₂); and combustion contaminants derived from the fuel in excess of 10 pounds per hour.
This emission limit applies to Boiler #3 (BO-01), the Vericor Gas Turbine with Duct Burner (GT-01), and the ROEMMC Process Heater (RO-01).
[Basis: AAD SIP Approved Rule 19]

**III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS
(continued)**

D. VISIBLE EMISSIONS

A source shall not discharge any air contaminant into the atmosphere from any emission point that is greater than or equal to 20% opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period.

[Basis: AAD Rule 202]

E. This condition is enforceable only by the AAD because it is based on a non-SIP approved rule.

FUGITIVE DUST

The facility shall take all reasonable efforts to control fugitive emissions. Fugitive emissions include all emissions that become airborne from equipment and systems associated with this Federal Operating Permit, except those that are emitted from an exhaust stack.

[Basis: AAD Rule 218]

**F. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
(NESHAP)**

PARTICLEBOARD AND COMPOSITE WOOD PRODUCTS (PCWP)

1. The particleboard board press (EU-21) is subject to 40 CFR 63 Subpart DDDD - National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Particleboard and Composite Wood Products (PCWP) [begin at 63.2230].
2. The biofilter (BF-01) shall be operated and maintained such that the resulting emissions from the particleboard press vents (EU-21) comply with one of the compliance options listed below.
 - a. Reduce emissions of total HAP, measured as THC (as carbon) by 90 percent; or
 - b. Limit emissions of total HAP, measured as THC (as carbon) to 20 ppmvd; or
 - c. Reduce methanol emissions by 90 percent; or
 - d. Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the biofilter are greater than or equal to 10 ppmvd; or
 - e. Reduce formaldehyde emission by 90 percent; or
 - f. Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the biofilter are greater than or equal to 10 ppmvd.

[Basis: 40 CFR 63.2240(b) and 40 CFR 63 Subpart DDDD Table 1B]

III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS (continued)

3. **Continuous Compliance Demonstration - Biofilter Bed:** Maintain the 24-hour block biofilter bed temperature within the range established according to 40 CFR 63.2262(m).
[Basis: 40 CFR 63.2271(a) 40 CFR 63 Subpart DDDD Tables 2 and 7]
4. **Continuous Compliance Demonstration - Dry Rotary Dryer:** Maintain the 24-hour block average inlet furnish moisture content at less than or equal to 30 percent (by weight, dry basis) and maintain the 24-hour block average inlet dryer temperature at less than or equal to 600 °F.
[Basis: 40 CFR 63.2271(a) and 40 CFR 63 Subpart DDDD Table 8]
5. **Routine Control Device Maintenance Exemption:**
 - a. The permittee may request a routine control device maintenance exemption from the U.S. EPA Administrator for routine maintenance events such as control device bakeouts, washouts, media replacement, and replacement of corroded parts. The permittee's request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how you plan to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the U.S. EPA Administrator.
 - b. The permittee shall also comply with all other requirements of 40 CFR 63.2251.
[Basis: 40 CFR 63.2251]
6. **General Requirements of 40 CFR 63 Subpart DDDD Plywood and Composite Wood Products**
 - a. The permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CFR 63.2251.
[Basis: 40 CFR 63.2250(a)]
 - b. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.
[Basis: 40 CFR 63.2250(a)]

III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS (continued)

- c. The permittee must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i).

[Basis: 40 CFR 63.2250(b)]

- i. *Operation and maintenance requirements.* (1)(i) At all times, including periods of startup, shutdown, and malfunction, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the owner or operator reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the owner or operator to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the Startup, Shutdown and Malfunction Plan required in paragraph (e)(3) of this section), review of operation and maintenance records, and inspection of the source.

[Basis: 40 CFR 63.6(e)(1)(i)]

G. NEW SOURCE PERFORMANCE STANDARDS (NSPS) FOR STATIONARY GAS TURBINES

1. The Vericor Gas Turbine and Duct Burner (GT-01) are subject to 40 CFR 60 Subpart KKKK New Source Performance Standards for Stationary Combustion Turbines [begin at 60.4300].
[Basis: 40 CFR 60.4305]
2. The NO_x emissions concentration in the gas turbine exhaust shall not exceed 42 ppmvd at 15% O₂ averaged over any 1-hour period.
[Basis: 40 CFR 60.4320]
3. The NO_x emissions concentration in the duct burner exhaust shall not exceed 54 ppmvd at 15% O₂ averaged over any 1-hour period.
[Basis: 40 CFR 60.4320]
4. The SO₂ emissions from the gas turbine shall not exceed 0.060 lb SO₂/MMBTU of heat

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**III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS
(continued)**

input averaged over any 1-hour period.

[Basis: 40 CFR 60.4320]

5. The permittee must operate and maintain the stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

[Basis: 40 CFR 60.4333]

H. CARB AIR TOXIC CONTROL MEASURE (ATCM) FOR STATIONARY IC ENGINES

1. *The conditions in this Section, except for H.6, are enforceable only by the AAD because they are based on a non-SIP approved rule.*

2. The IC Engine, Emergency Use (DP-01) is subject to Title 17, California Code of Regulations Section 93115 Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines.

[Basis: non-SIP approved CCR Title 17 Section 93115.2(b)]

3. The IC engine shall operate only for the following purposes and shall not operate more than the following hours:

[Basis: non-SIP approved CCR Title 17 Section 93115.3(n)]

Type of Operational Hours	Maximum Allowable Operation	
	hours/day	hours/year
Maintenance Purposes (A):		
Weekly Testing – NFPA 25, Sec. 5-3.2.2	0.5	
Annual Testing (no flow) – NFPA 25, Sec. 5-3.3.2.1	1	40
Annual Testing (flow) – NFPA 25, Sec. 5-3.3.1	1	
Quarterly Testing – NFPA 25, Sec. 9-5.2.1	0.5	
Every Five Years – NFPA 25, Sec. 9-5.2.2	4	
Maintenance Purposes Plus Emergency Use Purposes (B)	No limit	No limit

(A) Maintenance purposes is defined as: The necessary operation of an IC engine in order to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 – “Standards for Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems,” 2002 edition or when required by the AAD to verify compliance with the applicable rules and regulations.

(B) Emergency Use Purposes means the pumping of water for fire suppression or protection.

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**III. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
EMISSION LIMITATIONS AND OPERATIONAL LIMITATIONS
(continued)**

- 4. The IC engine shall be equipped with a non-resetting hour meter, with a minimum display capability of 9,999 hours, to ensure compliance with Condition No. 5.
[Basis: non-SIP approved CCR Title 17 Section 93115.10(d)(1)]
- 5. The permittee shall not fuel the IC engine with any fuel unless the fuel is one of the following:
 - a. CARB Diesel Fuel, or
 - b. An alternative diesel fuel that is:
 - i. biodiesel;
 - ii. a biodiesel blend that does not meet the definition of CARB Diesel Fuel;
 - iii. a Fischer-Tropsch fuel; or
 - iv. an emulsion of water in diesel fuel; or
 - c. Any alternative diesel fuel that is not identified in Section B. above and meets the requirements of the CARB Verification Procedure; or
 - d. An alternative fuel, or
 - e. CARB Diesel Fuel used with fuel additives that meets the requirements of the CARB Verification Procedure (as codified in CCR Title 13 Sections 2700-2710), or
 - f. Any combination of 7.A through 7.E above.
[Basis: non-SIP approved CCR Title 17 Section 93115.5(a)]
- 6. Upon request of the AAD Air Pollution Control Officer, once each year, during daylight hours, the IC engine shall be run at maximum anticipated load, from a cold start condition, for observation of compliance with opacity limitations.
[Basis: AAD Rule 505]

I. PRODUCTION LIMITS

- 1. The following table identifies the annual production limits that have been instituted to ensure the facility remains in compliance with AAD and federal regulations.
[Basis: AAD Rule 505]

TABLE 1 - Production Limits		
Equipment	Limit	Units
Boiler #3 (BO-01)	1,400,000	Therms of natural gas

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(continued)**

TABLE 1 - Production Limits		
Equipment	Limit	Units
ROEMMC process heater (RO-01)	350,000	MMBTU (total from natural gas and/or sanderdust)
Truck dumps (EU-01) and portable truck dump (EU-02)	336,521	Bone dry tons of wood
Premix dryer (EU-6)	45,542	Bone dry tons of wood (total from #1 and/or #2)
Core dryer #1 (EU-18)	79,543	Bone dry tons of wood
Core dryer #2 (EU-19)	79,543	Bone dry tons of wood
Face dryer (EU-11)	127,511	Bone dry tons of wood
Particleboard press (EU-21)	213,000	Thousands of square feet (MSF) at 3/4"

J. OPERATING AND EMISSION LIMITS

1. Gas Turbine Operation is Limited When Boiler No. 3 Operates: The gas turbine may not be operated simultaneously with Boiler No. 3 except during start-up, shut-down or malfunctions. A maximum of 440 hours per year are allowed for the simultaneous operation of the gas turbine and Boiler #3.

[Basis: AAD Rule 505]

2. No chromium based water treatment chemicals shall be used the industrial process cooling tower.

[Basis: 40 CFR 63.402] [also a requirement of non-SIP approved CCR Title 17 Section 93103]

3. Gas Turbine Mass Emissions Limit: The mass emissions from the gas turbine shall not exceed the following limits.

[Basis: AAD Rule 505]

Gas Turbine

Pollutant	Emission Factor lb/MMBTU	Maximum Allowable Emissions (F)	
		lb/hour	lb/year
VOC	0.0021 (A)	0.09	754
NOx	0.153 (B)	6.3	54,958
SO2	0.0014 (C)	0.06	503
PM10	0.0088 (D)	0.36	3,161

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Pollutant	Emission Factor lb/MMBTU	Maximum Allowable Emissions (F)	
		lb/hour	lb/year
CO	0.205 (E)	8.4	73,636

- (A) Emission factor for VOC is from U.S. EPA AP42 Table 3.1-2a (04/2000).
- (B) Emission factor for NOx is from a source test of the gas turbine when located at the SierraPine Medford facility plus 10%.
- (C) Emission factor for SO2 is based on a natural gas sulfur content of 0.5 grains S/100 cubic feet.
- (D) Emission factor for PM10 is from a source test of the gas turbine when located at the SierraPine Medford facility plus 10% and includes PM10 emissions from the duct burner.
- (E) Emission factor for CO is from a source test of the gas turbine when located at the SierraPine Medford facility plus 10%.
- (F) Emissions based on 41 MMBTU/hour and 8760 hours/year of operation.

4. Duct Burner Mass Emissions Limit: The mass emissions from the duct burner shall not exceed the following limits.

[Basis: AAD Rule 505]

Duct Burner

Pollutant	Emission Factor lb/MMBTU	Maximum Allowable Emissions (F)	
		lb/hour	lb/year
VOC	0.0055 (A)	0.083	723
NOx	0.05 (B)	0.75	6,570
SO2	0.0014 (C)	0.021	184
PM10	(D)		
CO	0.084 (E)	1.26	11,038

- (A) Emission factor for VOC is from U.S. EPA AP42 Table 1.4-2 (07/1998).
- (B) Emission factor for NOx is from U.S. EPA AP42 Table 1.4-1 (07/1998) for low NOx burner.
- (C) Emission factor for SO2 is based on a natural gas sulfur content of 0.5 grains S/100 cubic feet.
- (D) PM10 emissions are included in the PM10 emissions from the gas turbine.
- (E) Emission factor for CO is from U.S. EPA AP42 Table 1.4-1 (07/1998).
- (F) Emissions based on 15 MMBTU/hour and 8,760 hours/year of operation.

IV. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – MONITORING AND TESTING

A. PRODUCTION LIMITS

The facility shall maintain a monthly log showing each emission unit name, the annual production limit and units, and the rolling 12-month production total for each emission unit to demonstrate compliance with the production limits listed in Condition No. III.I.

[Basis: AAD Rule 500.VI.B.6 and Rule 513]

B. PARTICULATE MATTER FROM POINT SOURCES

For particulate matter emission limitations in Condition No. III.D the facility shall perform the following monitoring and testing:

1. Visible Emission Evaluations

The facility shall conduct one opacity observation by U.S. EPA Method 22 at least once during each calendar month while the following point sources are in operation: premix dryer (EU-06), core dryers #1 (EU-18) and #2 (EU-19), face dryer (EU-11), particleboard press biofilter (BF-01) and cooling vents (EU-22) and all other cyclone (EU-29) and baghouse exhaust stacks (BH-01 through BH-19).

[Basis: AAD Rule 500.VI.B.5 and 40 CFR 64]

2. Baghouse Operation and Maintenance

- a. The operation and maintenance plan shall apply to all baghouses identified in Section II.
- b. The permittee shall prepare a maintenance plan addressing the operation of all baghouse units.
 - i. A copy of the maintenance plan shall be provided to the AAD Air Pollution Control Officer.
 - ii. The permittee shall schedule regular inspections for such problems as pressure differential changes (manometer readings), air leaks, and loose or worn bags.
 - iii. The maintenance plan shall list repair procedures to be followed if visible emissions are observed.
- c. A supply of replacement bags shall be kept on site in sufficient number to provide for baghouse system maintenance.
- d. A maintenance log shall be kept showing when maintenance was performed, when bags were replaced and the results of monthly pressure differential manometer readings.

[Basis: AAD Rule 505]

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- C. *This condition is enforceable only by the AAD because it requires monitoring of a activity that is regulated by non-SIP approved AAD Rule 218.*

PARTICULATE MATTER FROM NON-POINT SOURCES

1. For requirements in Condition No. III.E, the facility shall perform the following monitoring and testing activities:
 - a. The facility shall conduct one opacity observation by U.S. EPA Method 22 at least once during each calendar month for the following non-point sources to determine if fugitive dust control methods are effective:
 - i. truck dumps,
 - ii. paved and unpaved roads,
 - iii. wood storage building and
 - iv. outside storage areas.

[Basis: AAD Rule 218 and 505]

D. NESHAP DDDD PLYWOOD AND COMPOSITE WOOD PRODUCTS PARAMETER MONITORING:

1. Biofilter Bed Temperature Monitoring
 - a. The permittee shall continuously monitor biofilter bed temperature.
[Basis: 40 CFR 63.2271(a) and Table 8 of Subpart DDDD]
 - b. The permittee shall determine the 24-hour block Biofilter Bed temperature after every 24 hours of operation by taking the average of all recorded readings in the previous 24 hours (excluding periods described in 40 CFR 63.2270(b) and (c)).
[Basis: 40 CFR 63.2270(e)]
 - c. To calculate the data averages for each 24-hour averaging period, you must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.* , not from periods described in 40 CFR 63.2270(b) and (c)).
[Basis: 40 CFR 63.2270(f)]

2. Dry Rotary Dryer Temperature and Furnish Moisture Monitoring

- a. The permittee shall continuously monitor Dry Rotary Dryer temperature and furnish moisture for emission units Core Dryer No. 1 (EU-18), Core Dryer No. 2 (EU-19), Face

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MONITORING AND TESTING (continued)**

Dryer (EU-11), and Pre-mix Dryer (EU-07).

[Basis: 40 CFR 63.2263 and Table 8 to Subpart DDDD]

- b. The permittee shall determine the 24-hour block Dry Rotary Dryer temperature after every 24 hours of operation by taking the average of all recorded readings in the previous 24 hours (excluding periods described in 40 CFR 63.2270(b) and (c)).
[Basis: 40 CFR 63.2270(e)]
- c. To calculate the data averages for each 24-hour averaging period, you must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.* , not from periods described in 40 CFR 63.2270(b) and (c)).
[Basis: 40 CFR 63.2270(f)]
3. Temperature Monitoring for Biofilter Bed and Dry Rotary Dryers Temperature -
For each temperature monitoring device, the permittee must meet the following requirements:
[Basis: 40 CFR 63.2269(b)]
 - a. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
[Basis: 40 CFR 63.2269(a)(1)]
 - b. At all times, the permittee shall maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[Basis: 40 CFR 63.2269(a)(2)]
 - c. The permittee shall record the results of each inspection, calibration, and validation check.
[Basis: 40 CFR 63.2269(a)(3)]
 - d. Locate the temperature sensor in a position that provides a representative temperature.
[Basis: 40 CFR 63.2269(b)(1)]
 - e. Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.
[Basis: 40 CFR 63.2269(b)(2)]
 - f. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.
[Basis: 40 CFR 63.2269(b)(3)]
 - g. Perform a calibration at least once per semiannual compliance period according to the procedures in the manufacturer's owner's manual. Following the calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a

IV. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – MONITORING AND TESTING (continued)

reading within 30 °F of the process temperature sensor's reading.

[Basis: 40 CFR 63.2269(b)(4)]

- h. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
[Basis: 40 CFR 63.2269(b)(5)]
 - i. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.
[Basis: 40 CFR 63.2269(b)(6)]
4. Wood Moisture Monitoring: For each furnish moisture meter, the permittee shall meet the following requirements:
[Basis: 40 CFR 63.2269(c)]
- a. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
[Basis: 40 CFR 63.2269(a)(1)]
 - b. At all times, the permittee shall maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
[Basis: 40 CFR 63.2269(a)(2)]
 - c. The permittee shall record the results of each inspection, calibration, and validation check.
[Basis: 40 CFR 63.2269(a)(3)]
 - d. The permittee shall, for dry rotary dryers, use a continuous moisture monitor with a minimum accuracy of 1 percent (dry basis) moisture or better in the 25 to 35 percent (dry basis) moisture content range. Alternatively, the permittee may use a continuous moisture monitor with a minimum accuracy of 5 percent (dry basis) moisture or better for dry rotary dryers used to dry furnish with less than 25 percent (dry basis) moisture.
[Basis: 40 CFR 63.2269(c)(1)]
 - e. The permittee shall locate the moisture monitor in a position that provides a representative measure of furnish moisture.
[Basis: 40 CFR 63.2269(c)(2)]
 - f. The permittee shall calibrate the moisture monitor based on the procedures specified by the moisture monitor manufacturer at least once per semiannual compliance period (or more frequently if recommended by the moisture monitor manufacturer).
[Basis: 40 CFR 63.2269(c)(3)]
 - g. The permittee shall at least quarterly inspect all components of the moisture monitor for integrity and all electrical connections for continuity.

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[Basis: 40 CFR 63.2269(c)(4)]

- h. The permittee shall use Equation 1 of 40 CFR 63.2269(c)(5) to convert percent moisture measurements wet basis to a dry basis.

[Basis: 40 CFR 63.2269(c)(5)]

E. BAGHOUSE OPERATION PARAMETER MONITORING:

- 1. *At least daily* when operating, the permittee shall monitor each baghouse pressure drop (for those baghouses BH-01 through BH-19 identified in Section II) and initiate corrective action if the pressure drop exceeds the following range in inches of water.

The permittee shall have 180 days from the date that the Title V permit is renewed to establish specific pressure drop ranges for each baghouse.

[Basis: CAM – 40 CFR Part 64]

Baghouse ID	Baghouse Pressure Drop Operating Range (inches of water)
BH-01	To be determined within 180 days of Title V Permit renewal date
BH-02	
BH-03	
BH-04	
BH-05	
BH-06	
BH-07	
BH-08	
BH-09	
BH-10	
BH-11	
BH-12	
BH-13	
BH-14	
BH-15	
BH-16	

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MONITORING AND TESTING (continued)**

Baghouse ID	Baghouse Pressure Drop Operating Range (inches of water)
BH-17	
BH-18	
BH-19	

F. GAS TURBINE NSPS FUEL SULFUR CONTENT MONITORING

1. The permittee shall not be required to monitor the sulfur content of the natural gas fuel for the gas turbine if the following record is maintained.
 - a. The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas is 20 grains of sulfur or less per 100 standard cubic feet.

[Basis: 40 CFR 60.4365]

G. SOURCE TESTING:

1. ROEMMC Process Heater:
 - a. The permittee shall conduct a source test of the ROEMMC process heater (RO-01) and dryer equipment during the duration of this permit to determine emissions only if there is a significant change in the operation of the equipment.
 - b. If a source test is required because there is a significant change in the operation of the equipment, it shall be conducted within 180 days of the equipment revision or re-issuance of the Title V Federal Operating Permit for the equipment.
 - c. The following source testing methods for the ROEMMC process heater shall be used when source testing is required.
 - i. The organic contents of the exhaust gases from the stack shall be determined using U.S. EPA Method 25 or 25A (40 CFR 60 Appendix A) or an equivalent method approved by the AAD Air Pollution Control Officer.
 - ii. The particulate matter content of the exhaust gases from the stack shall be determined using U.S. EPA Method 5 - with the impinger train included or an equivalent method approved by the AAD Air Pollution Control Officer.
 - iii. The source test shall also measure carbon monoxide and nitrogen oxide emissions.

[Basis: AAD Rule 500.VI.B.5]

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IV. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – MONITORING AND TESTING (continued)

2. Biofilter:
 - a. The permittee shall conduct a performance test on the biofilter (BF-01):
 - i. once every 2 years following the initial performance test and
 - ii. within 180 days after each replacement of any portion of the biofilter media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media.
[Basis: 40 CFR 63.2271 and 40 CFR 63 Subpart DDDD Table 7]
 - b. The permittee shall meet the requirements in 40 CFR 63.7(e)(1), the requirements of 40 CFR 63.2262(b) through (o) and according to the methods specified in Table 4 of 40 CFR 63, Subpart DDDD in performing any performance test unless an alternative testing procedure is approved in advance.
[Basis: 40 CFR 63.2262 and 40 CFR 63.7]
3. Vericor Gas Turbine:
 - a. The permittee shall conduct a NO_x source test on the Vericor Gas Turbine (GT-01) exhaust once each calendar year.
 - b. The source test shall be conducted as required by 40 CFR 60.4400.
[Basis: 40 CFR 60.4340]
4. Source Test Notification, Source Test Plan and Source Test Report Procedures
 - a. Submit a Source Test Plan to the AAD Air Pollution Control Officer for approval at least 30 days before the source test is to be performed.
 - b. Notify the AAD Air Pollution Control Officer at least 7 days prior to the emission testing date if the date has changed from that approved in the Source Test Plan.
 - c. Submit the source test report to the AAD Air Pollution Control Officer within 60 days after the completion of the source test
[Basis: AAD Rule 505 and, 40 CFR 63.7]

**V. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
RECORDKEEPING**

A. MINIMUM RECORDKEEPING REQUIREMENTS:

1. The facility shall keep records of the monitoring and testing activities in Condition No. IV including:
 - a. date, place, and time of sampling,
 - b. operating conditions at the time of sampling,
 - c. date, place and method of analysis and
 - d. results of the analysis.

[Basis: AAD Rule 513]

B. RECORD RETENTION:

The facility shall maintain records of all required monitoring data and support information for a period of at least 5 years from the date of sample collection, measurement, report, or application.

[Basis: AAD Rule 500.VI.B.6]

C. ADDITIONAL SPECIFIC REQUIREMENTS:

1. The AAD Air Pollution Control Officer may require the facility to keep records necessary to show compliance with the conditions of this Title V Federal Operating Permit. The following specific records have been required:
 - a. The facility shall record the hours of operation of all permitted equipment.
 - b. The facility shall record the amount of raw materials and fuels processed by all permitted equipment.
 - c. The facility shall record the average tons per hour of material processed through the particleboard press.

[Basis: AAD Rule 513]

D. FALSIFICATION:

The facility shall not knowingly falsify or render inaccurate any monitoring device or method of record required to be maintained or followed by this Federal Operating Permit.

[Basis: AAD Rules 513 and 515]

**E. RECORDKEEPING SPECIFIC TO NESHAP 40 CFR 63 SUBPART DDDD
PLYWOOD AND COMPOSITE WOOD PRODUCTS**

1. The permittee shall keep records listed below.
 - a. for the Dry Rotary Dryer the inlet furnish moisture and the inlet dryer temperature.

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[Basis: 40 CFR 63.2282(b) and 40 CFR 63 Subpart DDDD Table 8]

- b. a copy of each notification and report that you submitted to comply with 40 CFR 63 Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
- c. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
- d. Documentation of your approved routine control device maintenance exemption, if you request such an exemption under 40 CFR 63.2251.
- e. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

[Basis: 40 CFR 63.2282(a)]

F. RECORDKEEPING SPECIFIC TO THE GAS TURBINE AND DUCT BURNER

1. Specific to NSPS 40 CFR 60 Subpart KKKK STATIONARY GAS TURBINES

- a. For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.

[Basis: 40 CFR 60.4375]

- b. For each affected unit that performs annual performance tests in accordance with §60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

[Basis: 40 CFR 60.4375]

2. Specific to AAD Rules

- a. Total annual hours the gas turbine operated. (hours/year)
- b. Total annual hours the duct burner operated. (hours/year)
- c. Total annual natural gas fuel consumption of the gas turbine. (MMBTU/year)
- d. Total annual natural gas fuel consumption of the duct burner. (MMBTU/year)

VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – REPORTING AND COMPLIANCE

A. MINIMUM REPORTING REQUIREMENTS:

The facility shall report at a minimum the following information to the AAD:

1. Conditions that result in any excess emissions or other violations of this permit, including those due to emergency, upset or breakdown conditions. The facility shall notify the AAD by telephone, e-mail, or facsimile within two (2) hours of the start of the event. A written report must be submitted to the AAD Air Pollution Control Officer within one week (7 days) of the event.
[Basis: AAD Rule 516 and SIP Rule 404].
2. A monitoring report identifying deviations from permit requirements, including those reported in Condition No. VI.A.1. The monitoring report must include the probable cause of each deviation and any preventative or corrective action taken by the facility. The monitoring report must be submitted by July 31 for the reporting period January 1 through June 30 and by January 31 for the reporting period July 1 through December 31.
[Basis: AAD Rule 500.VI.B.7]
3. A progress report on any compliance schedule for equipment that is not in compliance with this Title V Federal Operating Permit as noted in Condition No. VI.A.2 above. The progress report must include the date when compliance will be achieved, an explanation of why compliance was not, or will not be achieved by the scheduled date, a log of any preventative or corrective action taken and a written statement from the responsible official of the facility which certifies the truth, accuracy, and completeness of the report. The progress report must be submitted semi-annually by January 31 and July 31.
[Basis: AAD Rule 500.VI.B.7]
4. The facility shall furnish, in a timely manner, any information or records requested by the AAD Air Pollution Control Officer pertaining to emissions compliance, production records, equipment and facility operations or other air quality related information.
[Basis: AAD Rule 500 VI.B.6, Rule 513, and Rule 505]
5. By January 31 of each year, the facility shall provide a written report to the AAD Air Pollution Control Officer describing the annual material throughput, fuel usage, and hours of operation for all equipment associated with this Title V Federal Operating Permit for the previous calendar year. The facility shall provide the average tons per hour of material processed through the particleboard press. The process rate will determine the discharge limit of particulate matter based on the AAD Rule 212 Process Weight Table.
[Basis: AAD Rule 513]
6. The facility shall submit the monthly log of production limits identified in Condition No. IV.I as part of the semi-annual monitoring report identified in Condition No. VI.A.2 above.
[Basis: AAD Rule 513]

**VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
REPORTING AND COMPLIANCE (continued)**

B. EMERGENCY PROVISIONS:

1. In addition to the notification requirements of Condition No. VI.A.1, in the case of an emergency at the facility, the responsible official shall submit to the AAD a signed contemporaneous log and other evidence that demonstrates the following:
 - a. an emergency occurred,
 - b. the cause of the emergency,
 - c. the facility was being properly operated at the time of the emergency,
 - d. all steps were taken to minimize the emissions resulting from the emergency and
 - e. within two (2) working days of the emergency provide the AAD with a description of the emergency and corrective actions taken.

[Basis: AAD Rule 500.VI.B.12]

C. COMPLIANCE PLAN:

On the date this Title V Federal Operating Permit is issued the facility is currently in compliance. Therefore, the compliance plan consists of continued adherence to the requirements of this Title V Federal Operating Permit and those requirements set forth in applicable AAD, State of California and federal regulations and statutes.

[Basis: AAD Rule 500.VI.B.8.]

D. COMPLIANCE SCHEDULE:

On the date this Title V Federal Operating Permit is issued the facility is currently in compliance, therefore, no compliance schedule is required.

[Basis: AAD Rule 500.VI.B.9.]

E. COMPLIANCE CERTIFICATION:

1. In order to demonstrate compliance with the provisions of this Title V Federal Operating Permit, the facility shall submit an Annual Emissions Report and Certification Statement by January 31 of each year describing the emissions of regulated pollutants for the previous calendar year.
2. The compliance certification shall include the following as a minimum:
 - a. identification of each term or condition of the permit that is the basis for the certification,
 - b. the compliance status,
 - c. whether compliance was continuous or intermittent and
 - d. the methods used for determining the compliance status of the source, both currently and over the entire statement reporting period.

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3. The Annual Emissions Report and Certification Statement and any additional reports or compliance certifications submitted shall be certified by a responsible official for truth, accuracy, and completeness. Submission of fraudulent data or information may be deemed a criminal violation. All documents must be submitted to both of the following:

[Basis: AAD Rule 500.VI.B.14 and Rule 513]

Director, Air Division
U.S. EPA
75 Hawthorne Street, AIR-3
San Francisco, CA 94105

Air Pollution Control Officer
Amador Air District
12200-B Airport Road
Jackson, CA 95642

F. SPECIFIC COMPLIANCE REPORTING FOR NESHAP SUBPART DDDD PLYWOOD AND COMPOSITE WOOD PRODUCTS

1. The compliance report must contain the following information:
 - a. Company name and address.
 - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - c. Date of report and beginning and ending dates of the reporting period.
 - d. If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your SSMP, the compliance report must include the information specified in 40 CFR 63.10(d)(5)(i).
 - e. A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the following information.
 - i. The date and time when the control device was shut down and restarted.
 - ii. Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
 - iii. A statement of whether or not the control device maintenance was included in your approved routine control device maintenance exemption developed pursuant to 40 CFR 63.2251. If the control device maintenance was included in your approved routine control device maintenance exemption, then you must report the following information.
 - (A) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.
 - (B) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period.
 - (C) Based on the information recorded under paragraphs (A) and (B) of this section for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of this section.

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$$RM = \frac{DTp + DTc}{PUp + PUc} \quad (\text{Equation 1})$$

Where:

RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance;

PUp = Process unit uptime for the previous semiannual compliance period;

PUc = Process unit uptime for the current semiannual compliance period;

DTp = Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period;

DTc = Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.

- f. The results of any performance tests conducted during the semiannual reporting period.
 - g. If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in 40 CFR 63 Subpart DDDD Table 8, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
 - h. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
2. For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in 40 CFR Subpart DDDD Table 8 that occurs at an affected source where you are not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in Subpart DDDD, the compliance report must contain the information in paragraphs 1.a through 1.f of this section and in paragraphs 2.a and 2.b of this section. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - a. The total operating time of each affected source during the reporting period.
 - b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
 3. For each deviation from a compliance option or operating requirement occurring at an affected source where you are using a CMS to comply with the compliance options and operating requirements in this subpart, you must include the information in paragraphs 1.a through 1.f and paragraphs 3.a through 3.k of this section. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - a. The date and time that each malfunction started and stopped.
 - b. The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

**VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
REPORTING AND COMPLIANCE (continued)**

- c. The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
 - d. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in your approved routine control device maintenance exemption; or during another period.
 - e. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - f. A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
 - g. A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
 - h. A brief description of the process units.
 - i. A brief description of the CMS.
 - j. The date of the latest CMS certification or audit.
 - k. A description of any changes in CMS, processes, or controls since the last reporting period.
4. If you comply with the emissions averaging compliance option in 40 CFR 63.2240(c), you must include in your semiannual compliance report calculations based on operating data from the semiannual reporting period that demonstrate that actual mass removal equals or exceeds the required mass removal.
 5. Each affected source that has obtained a Title V Federal Operating Permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to 40 CFR 63 Subpart DDDD Table 9 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

[Basis: 40 CFR 63.2281]

G. STARTUP, SHUTDOWN, AND MALFUNCTION PLAN

This condition is applicable to the equipment and processes subject to the NESHAP Subpart DDDD.

**VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
REPORTING AND COMPLIANCE (continued)**

1. The owner or operator of an affected source must develop a written Startup, Shutdown, and Malfunction Plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard. The Startup, Shutdown, and Malfunction Plan does not need to address any scenario that would not cause the source to exceed an applicable emission limitation in the relevant standard. This plan must be developed by the owner or operator by the source's compliance date for that relevant standard. The purpose of the Startup, Shutdown, and Malfunction Plan is to:
 - a. Ensure that, at all times, the owner or operator operates and maintains each affected source, including associated air pollution control and monitoring equipment, in a manner which satisfies the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i);
 - b. Ensure that owners or operators are prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of hazardous air pollutants; and
 - c. Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
2. When actions taken by the owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's Startup, Shutdown and Malfunction Plan, the owner or operator must keep records for that event which demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping that confirms conformance with the Startup, Shutdown, and Malfunction Plan and describes the actions taken for that event. In addition, the owner or operator must keep records of these events as specified in 40 CFR 63.10(b), including records of the occurrence and duration of each startup or shutdown (if the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of operation and each malfunction of the air pollution control and monitoring equipment. Furthermore, the owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's Startup, Shutdown and Malfunction Plan in the semiannual (or more frequent) Startup, Shutdown and Malfunction Report required in 40 CFR 63.10(d)(5).
3. If an action taken by the owner or operator during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's Startup, Shutdown and Malfunction Plan, and the source exceeds any applicable emission limitation in the relevant emission standard, then the owner or operator must record the actions taken for that event and must report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event, in accordance with 40 CFR 63.10(d)(5) (unless the

**VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
REPORTING AND COMPLIANCE (continued)**

- owner or operator makes alternative reporting arrangements, in advance, with the U.S. EPA Administrator).
4. The owner or operator must maintain at the affected source a current Startup, Shutdown, and Malfunction Plan and must make the plan available upon request for inspection and copying by the U.S. EPA Administrator. In addition, if the Startup, Shutdown and Malfunction Plan is subsequently revised as provided in 40 CFR 63.6(e)(3)(viii), the owner or operator must maintain at the affected source each previous (i.e., superseded) version of the Startup, Shutdown and Malfunction Plan, and must make each such previous version available for inspection and copying by the U.S. EPA Administrator for a period of 5 years after revision of the plan. If at any time after adoption of a Startup, Shutdown and Malfunction Plan the affected source ceases operation or is otherwise no longer subject to the provisions of this part, the owner or operator must retain a copy of the most recent plan for 5 years from the date the source ceases operation or is no longer subject to this part and must make the plan available upon request for inspection and copying by the U.S. EPA Administrator. The U.S. EPA Administrator may at any time request in writing that the owner or operator submit a copy of any Startup, Shutdown and Malfunction Plan (or a portion thereof) which is maintained at the affected source or in the possession of the owner or operator. Upon receipt of such a request, the owner or operator must promptly submit a copy of the requested plan (or a portion thereof) to the U.S. EPA Administrator. The owner or operator may elect to submit the required copy of any Startup, Shutdown, and Malfunction Plan to the U.S. EPA Administrator in an electronic format. If the owner or operator claims that any portion of such a Startup, Shutdown and Malfunction Plan is confidential business information entitled to protection from disclosure under section 114(c) of the Federal Clean Air Act or 40 CFR 2.301, the material which is claimed as confidential must be clearly designated in the submission.
 5. To satisfy the requirements of this section to develop a Startup, Shutdown and Malfunction Plan, the owner or operator may use the affected source's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this section and are made available for inspection or submitted when requested by the Administrator.
 6. Based on the results of a determination made under 40 CFR 63.6(e)(1)(i), the U.S. EPA Administrator may require that an owner or operator of an affected source make changes to the Startup, Shutdown and Malfunction Plan for that source. The Administrator must require appropriate revisions to a Startup, Shutdown, and Malfunction Plan, if the Administrator finds that the plan:
 - a. Does not address a startup, shutdown, or malfunction event that has occurred;
 - b. Fails to provide for the operation of the source (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions established by 40 CFR 63.6(e)(1)(i);
 - c. Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control and monitoring equipment as quickly as practicable; or

**VI. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
REPORTING AND COMPLIANCE (continued)**

- d. Includes an event that does not meet the definition of startup, shutdown, or malfunction listed in 40 CFR 63.2.
7. The owner or operator may periodically revise the Startup, Shutdown, and Malfunction Plan for the affected source as necessary to satisfy the requirements of this part or to reflect changes in equipment or procedures at the affected source. Unless the permitting authority provides otherwise, the owner or operator may make such revisions to the Startup, Shutdown, and Malfunction Plan without prior approval by the U.S. EPA Administrator or the permitting authority. However, each such revision to a Startup, Shutdown and Malfunction Plan must be reported in the semiannual report required by 40 CFR 63.10(d)(5). If the Startup, Shutdown and Malfunction Plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the Startup, Shutdown and Malfunction Plan at the time the owner or operator developed the plan, the owner or operator must revise the Startup, Shutdown and Malfunction Plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control and monitoring equipment. In the event that the owner or operator makes any revision to the Startup, Shutdown and Malfunction Plan which alters the scope of the activities at the source which are deemed to be a startup, shutdown, or malfunction, or otherwise modifies the applicability of any emission limit, work practice requirement, or other requirement in a standard established under this part, the revised plan shall not take effect until after the owner or operator has provided a written notice describing the revision to the permitting authority.
8. The Title V permit for an affected source must require that the owner or operator develop a Startup, Shutdown and Malfunction Plan which conforms to the provisions of this part, but may do so by citing to the relevant subpart or subparagraphs of 40 CFR 63.6(e). However, any revisions made to the Startup, Shutdown and Malfunction Plan in accordance with the procedures established by this part shall not be deemed to constitute permit revisions under 40 CFR Part 70 or Part 71 of this chapter and the elements of the Startup, Shutdown and Malfunction Plan shall not be considered an applicable requirement as defined in 40 CFR 70.2 and 71.2. Moreover, none of the procedures specified by the Startup, Shutdown and Malfunction Plan for an affected source shall be deemed to fall within the permit shield provision in Section 504(f) of the federal Clean Air Act.

[Basis: 40 CFR 63.2250(c) and 40 CFR 63.6(e)(3)]

VII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – GENERAL CONDITIONS

The Permittee shall comply with the following general requirements:

A. DUTY TO COMPLY:

The facility shall comply with all terms and conditions of this Title V Federal Operating Permit.

[Basis: AAD Rule 500.VI.B.11]

B. LIMITATION:

This Title V Federal Operating Permit does not release the facility from the duty to comply with any requirements of any applicable statute, ordinance, code, or law, including any Federal requirements, statutes of the State of California, County of Amador, city ordinances, or other legal requirements. This permit does not authorize emission of air contaminants in excess of limits established by the Code of Federal Regulations, the California Health and Safety Code or the Rules and Regulations of the AAD.

[Basis: AAD Rule 507]

C. PROPERTY RIGHTS:

This permit does not convey any property rights of any sort, or any exclusive privilege.

[Basis: AAD Rule 500.VI.B.11]

D. VIOLATION:

Any permit noncompliance constitutes a violation and is grounds for enforcement actions, permit termination, permit revocation, re-issuance, or modification, or for denial of a permit renewal application. Each day of non-compliance constitutes a separate violation.

[Basis: AAD Rule 500.VI.B.11]

E. SEVERABILITY:

The provisions of this Title V Federal Operating Permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the facility shall be construed and enforced as if the permit did not contain the particular provision held to be invalid and the applicable requirements underlying these provisions shall remain in force.

[Basis: AAD Rule 500.VI.B.13]

F. DUTY TO PAY:

Failure to pay fines, fees or other assessed charges from the AAD may result in enforcement action or termination of the permit or both. All fines, fees or other assessed charges are due and payable within 30 days of receipt of the invoice by the facility.

[Basis: AAD Rule 500.VII]

**VII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
GENERAL CONDITIONS (continued)**

G. PERMIT TRANSFER:

Upon change of control or ownership, the applicant shall notify any succeeding owner or operator of this facility of the existence of this Title V Federal Operating Permit in writing and a copy of the notification shall be provided to the AAD. The terms and conditions of this Title V Federal Operating Permit shall be binding on all subsequent owners or operators. A request for an administrative amendment shall be sought for changes in ownership or address of the facility.

[Basis: AAD Rule 500 and Rule 517]

H. PERMIT REOPENING:

This permit may be terminated, suspended, reopened, or amended for cause. Any request from the facility for revisions to the permit, planned non-compliance or other planned changes shall not stay the conditions of the permit. This permit must be reopened and revised if any of the following occur: additional requirements become applicable to the equipment subject to this permit and three or more years remain before the permit expires; additional requirements become applicable to an affected source under the acid rain program; the AAD Air Pollution Control Officer or the U.S. EPA Administrator determines that the permit contains a material mistake, inaccurate statements were made in establishing the emission standards, other terms or conditions of the permit, or the permit must be revised or revoked to ensure compliance with the applicable requirements or AAD regulations; or the U.S. EPA Administrator finds that cause exists pursuant to AAD Rule 500.V.H., or in response to a public petition.

[Basis: AAD Rule 500.VI.B.11]

I. PERMIT OR EQUIPMENT MODIFICATIONS:

This permit may be modified to reflect changes in operation, procedure, ownership or other provisions as necessary by following procedures specified in AAD Rule 500. Any modification other than normal repair and maintenance, or a change that is not allowed under the operation of this permit or AAD Rule 500.V.I, shall require a revised or new permit. If a new or revised permit is required, the operator shall make application to the AAD Air Pollution Control Officer and follow the procedures as specified in AAD Rule 500.IV.

[Basis: AAD Rule 500.IV]

J. POSTING OF PERMIT:

This permit shall be posted on or near the equipment listed above. This permit shall be readily available for inspection at all times while the equipment is operating. The permit (or a copy) shall be prominently displayed in a location accessible to all persons operating this equipment.

[Basis: AAD Rule 508]

K. RIGHT TO ENTER:

VII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS – GENERAL CONDITIONS (continued)

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the facility shall allow the AAD, the U.S. EPA, and the California ARB, or authorized representatives to perform the following:

1. enter upon the premises where an actual or potential source is located or where any records are kept as required to demonstrate compliance with the terms and conditions of this permit and to have access to and copy, at reasonable times, these records;
2. inspect, at any time while the plant is open for business or in production, any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and
3. sample or monitor any substances or parameters at any location and obtain and remove samples of any discharge or emission of pollutants. The facility may conduct parallel sampling for verification purposes.

[Basis: AAD Rule 500.VI.B.10 and Rule 509]

L. EMISSIONS TRADING:

No permit revision shall be required for increases in emissions allowed under any approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. The facility has requested and has been granted the right for trading emissions increases and decreases within the facility to the extent the applicable requirements provide for such trading and have been approved as tradable by the AAD Air Pollution Control Officer.

[Basis: 40 CFR 70.6(a)(8)].

M. DEFENSES TO ENFORCEMENT ACTIONS:

1. Need to Halt Activity - It shall not be a defense for a facility in an enforcement action that it would have been necessary to halt or reduce activity to maintain compliance.

[Basis: AAD Rule 500.VI.B.11]

2. Emergency Upset, Breakdown or Scheduled Maintenance - An emergency upset or breakdown condition shall be an affirmative defense to an enforcement action only if the conditions set forth in AAD Rule 500.VI.B.12 are met.

[Basis: AAD Rule 500.VI.B.12]

3. *This condition is enforceable only by the AAD because it is not based on a SIP approved rule.*

Emergency Upset or Breakdown - An emergency upset or breakdown condition shall be an affirmative defense to an enforcement action only if the conditions set forth in AAD Rule 516 are met.

[Basis: AAD Rule 516]

**VII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
GENERAL CONDITIONS (continued)**

N. CONFIDENTIAL RECORDS:

Any request for confidential designation of records must be made in writing to the AAD Air Pollution Control Officer as specified in AAD Rule 514.

[Basis: AAD Rule 514]

O. TERMS:

Terms not otherwise defined in the permit shall have the meanings assigned to such terms in the referenced regulations.

[Basis: 40 CFR 70.2].

P. ASBESTOS REMOVAL:

The facility shall comply with the provisions of 40 CFR Part 61, subpart M (Asbestos) during any renovation or demolition activity at this facility.

[Basis: 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 61, Subpart M (Asbestos)]

Q. STRATOSPHERIC OZONE:

The facility shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F Recycling and Emissions Reduction.

[Basis: 40 CFR 70.6 (a)(1)(i) and 40 CFR Part 82, Subpart F].

R. RISK MANAGEMENT PLAN:

Should the facility become subject to 40 CFR Part 68 for Risk Management Plans, the facility shall comply with the standards within the required timeframe in the regulations and subsequently certify compliance with 40 CFR Part 68 as part of the annual compliance certification required in Condition No. VI.E. of this permit.

[Basis: 40 CFR Part 68]

S. ACID RAIN PROVISIONS:

The operator shall comply with requirements to meet all applicable Acid Rain requirements promulgated under Title IV of the Federal Clean Air Act, including any requirements related to control or limitations on SO₂ and NO_x emissions. If another applicable requirement that is stricter than the Federal Acid Rain requirement applies to the source, both requirements shall be included in the permit.

[Basis: 40 CFR Parts 72 through 78]

T. NESHAP OR MACT:

**VII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS –
GENERAL CONDITIONS (continued)**

Should the facility become subject to an existing or newly promulgated National Emission Standards for Hazardous Air Pollutants for Source Categories or Maximum Achievable Control Technology standard, the facility shall comply with the standards within the required timeframe in the regulations.

[Basis: 40 CFR Part 63]

U. FEDERAL CLEAN AIR ACT SECTION 502(b)(110) CHANGES:

The facility shall monitor for and record, any federal Clean Air Act Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term. Notice must be given to the AAD Air Pollution Control Officer for any such change seven days in advance of enactment.

[Basis: 40 CFR 70.4(b)(12), Federal Clean Air Act Section 502(b)(10)]

V. PERMIT TERM:

This permit shall be valid for a period of five (5) years from the date the permit is approved for issuance. The right to operate terminates on the permit expiration date. If a written application for renewal of the permit is submitted, at least six (6) months but not more than eighteen (18) months, prior to expiration, the facility may continue to operate equipment in accordance with the conditions of this Federal Operating Permit until final action is taken by the AAD Air Pollution Control Officer on the permit renewal application.

[Basis: AAD Rule 500.IV.B.2 and Rule 500 VI.B.15]

VIII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS FUTURE EFFECTIVE REQUIREMENTS

- A. The IC Engine, Emergency Use (DP-01) is subject to 40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [begin at 63.6580]

The requirements of Subpart ZZZZ for this IC engine category (facility is a major source of HAP, existing IC engine, emergency use, < 500 hp) are -

1. This source must be in compliance by May 3, 2013.
[Basis: 40 CFR 63.6595(a)]
2. This permittee is required to perform the following maintenance:
 - a. Change the oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
[Basis: 40 CFR 63.6602 and Table 2c]
3. The permittee has an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 63.6625(i).
[Basis: 40 CFR 63.6602 and Table 2c]
4. During periods of startup, the permittee must minimize the engine idle at startup time not to exceed 30 minutes.
[Basis: 40 CFR 63.6602 and Table 2c]
5. The IC engine must be operated and maintained according to the manufacturer's emissions related written instructions or in accordance with a maintenance plan developed by the source which must provide to the extent practicable for maintenance and operation of the IC engine consistent with good air pollution control practice for minimizing emissions.
[Basis: 40 CFR 63.6625(e)]
6. Emergency use IC engines must install a non-resettable hour meter.
[Basis: 40 CFR 63.6625(f)]
7. This permittee must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
[Basis: 40 CFR 63.6655(a)(2)]
8. The permittee must keep records of all required maintenance conducted.
[Basis: 40 CFR 63.6655(a)(4)]

**VIII. FEDERALLY ENFORCEABLE APPLICABLE REQUIREMENTS
FUTURE EFFECTIVE REQUIREMENTS (continued)**

9. The permittee must keep records of actions taken during periods of malfunction to minimize emissions, including corrective action taken.
[Basis: 40 CFR 63.6655(a)(5)]

10. The permittee must keep records of the hours of operation of the IC engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation
[Basis: 40 CFR 63.6655(f)]

11. All records must be in a form suitable to and readily available for expeditious review according to 40 CFR 63.10(b)(1) by the AAD Air Pollution Control Officer, and kept for five years
[Basis: 40 CFR 63.6660]

AMADOR AIR DISTRICT

SierraPine - Ampine Division

Title V Permit No.: Title V-03
Permit Expires: December 1, 2016

IX. INSIGNIFICANT EMISSIONS UNITS

The following systems are considered insignificant emissions units and are not subject to equipment-specific requirements. However, these units are required to comply with all applicable general requirements:

Insignificant Equipment	Equipment Description	Basis for Designation as Insignificant (A)
Fire Drops - PB05, PB08, PB11, PBI5, PB18, PB25, and PB33	Fire drops for the core secondary screens (accepts), core dryer, core primary hammermills, core secondary screens, face dryer, intermediate dryer (Dryer #2), and pre-dryer	Section A. General Criteria for Insignificant Activities Emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than two tons per year of a regulated pollutant that is not a HAP.
Storage silos	Storage silos for core, intermediate and face material. Includes silos associated with PBI6, PB22, and PB26	
Milling equipment	Indoor or enclosed grinding and screening systems, including hammermills and Bauer mills. Includes equipment associated with PBI4 and PB21	
Material handling equipment	Indoor or enclosed bins and conveyors. Includes equipment associated with PB37	
Sawing and sanding equipment	Indoor saws, sanders and brushes	
Additive storage tanks	Includes 15,000 gallon concentrated urea blend (CUB), 15,000 gallon conventional wax, 11,000 gallon wax emulsion, 11,000 gallon urea water (scavenger) and 6,000 gallon ammonium sulfate catalyst aboveground storage tanks	
Boiler room storage tanks	(3) 200-gallon boiler treatment chemical aboveground, indoor storage tanks	

AMADOR AIR DISTRICT

SierraPine - Ampine Division

Title V Permit No.: Title V-03
Permit Expires: December 1, 2016

IX. INSIGNIFICANT EMISSIONS UNITS (continued)

Insignificant Equipment	Equipment Description	Basis for Designation as Insignificant (A)
Steam cleaning equipment		Insignificant Activities Emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than two tons per year of a regulated pollutant that is not a HAP.
Diesel storage tanks Hydraulic oil tanks	6,000 gallon, aboveground storage tank and 500 gallon portable aboveground storage tank One, 6,000-gallon aboveground oil storage tank and one, 4,500-gallon aboveground waste oil tank	Section B.8.1 Storage Containers, Reservoirs, and Tanks - General Organic and VOC-containing Material Any equipment used exclusively for the storage of unheated organic material with: 1) an initial boiling point of 150o Centigrade (C) [302o Fahrenheit (F)] or greater
Comfort air conditioning and ventilation units Refrigeration units		Section B.24 Refrigeration Units Any refrigeration unit provided the unit: 1) contains less than 50 pounds of refrigerant; and 2) is not used in conjunction with air pollution control equipment.

(A) See Attachment A - List of Title V Insignificant Activities to AAD Rule 501 Procedures for Issuing Permits To Operate for Sources Subject to Title V of the FCAA Amendments of 1990.