

Exhibit	Comment	Response
A	BACT should be required on all emission sources	The purpose of Title V is not to add any new requirements beyond those in the existing permits. As EPA stated in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, "In general, this program was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements. Accordingly, operating permits and their accompanying applications should be vehicles for defining existing compliance obligations rather than for imposing new requirements or accomplishing other objectives." BACT was previously determined for each relevant emission unit at the time the construction permit was issued. There is no regulatory basis to reopen those BACT determinations as part of the Title V issuance process. No action is required in response to this comment.
B	"NCASI is a research organization supported by members of the forest products industry; methods and emission factor development were not subject to a public review process."	The hierarchy for emission factors from least accurate to most accurate is AP-42, industry specific data, facility specific data and CEMS data. In employing NCASI emission factors, Roseburg was using better data than what is available from AP-42. NCASI data are considered highly reputable and are commonly employed by permitting agencies across the country. No action is required in response to this comment.
B	"NCASI Bulletin 858 is available to members but not the general public; thus, emission factors cannot be independently verified. Methods used to derive NCASI emission factors were not developed in a public process nor vetted publicly for input or review, Bulletin 858 was not attached to the application, and therefore its emission factors cannot be verified."	The hierarchy for emission factors from least accurate to most accurate is AP-42, industry specific data, facility specific data and CEMS data. Of those four groupings, only AP-42 data are developed through a public process. That difference does not make the other data less accurate. NCASI emission factors are considered superior to AP-42 due to their industry and fuel specific nature. It is worth noting that no new or different applicable requirements would apply to the Roseburg Weed facility and therefore be reflected in the Title V permit if different HAP emission factors were used. No action is required in response to this comment.

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B	<p>“NCASI emission factors are considerably lower than EPA’s AP-42 emission factors. Neither the SOB nor the Title V Permit Application provides an explanation why the NCASI factors were deemed applicable. The NCASI factors consist of about 85% of data taken from AP-42 and about 15% source tests submitted by NCASI members. The analysis of this data set was performed by NCASI without public input and resulted in substantially lower emission factors than those published in AP-42. The process used to develop the NCASI factors has not been publicly vetted; to the best of our knowledge US EPA was not consulted or involved in it, nor has the agency evaluated NCASI factors for accuracy or integrity.”</p>	<p>It would not be appropriate to address the suitability of particular emission factors in the Title V permit. However, we agree that it would be appropriate to add language to the SOB explaining why the NCASI emission factors are appropriate to use. EPA evaluation is not a prerequisite to the use of a reputable industry specific emission factor.</p>
B	<p>“The source test that is the basis for formaldehyde emissions estimates from RFP’s boiler was not provided. Thus, the emission factor for formaldehyde used for emission calculations cannot be verified.”</p>	<p>Table 3, footnote 1 of the November 2010 Title V application identifies the source of the formaldehyde emission factor as NCASI Technical Bulletin 858, Table 20A. NCASI data are considered highly reputable and are commonly employed by permitting agencies across the country. No action is required in response to this comment.</p>
B	<p>“We are very concerned about the legal ramifications of RFP’s selectively changing and substantially reducing emission factor quantities during the present Title V permitting process (with use of NCASI factors) from previously permitted annual emissions calculated with AP-42, particularly without adequate explanation.”</p>	<p>The hierarchy for emission factors from least accurate to most accurate is AP-42, industry specific data, facility specific data and CEMS data. In employing NCASI emission factors, Roseburg was using better data than what is available from AP-42. NCASI data are considered highly reputable and are commonly employed by permitting agencies across the country. In April 2008 EPA released process information regarding the boilers incorporated into the AP-42 emission factors for wood-fired boilers. This information clearly identified that a number of the boilers utilized in deriving the AP-42 emission factors for wood-fired boilers were tested while burning materials such as urea-formaldehyde resin, industrial demolition waste, urban wood waste and other fuels that are not relevant to what is burned in the Roseburg boiler. Therefore, it is reasonable that the NCASI emission factors, which are fuel specific, more accurately portray the Roseburg boiler emissions. No action is required in response to this comment.</p>

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B	<p>“The permit must require at least annual source testing for PM10 and PM2.5 emissions from the boiler to demonstrate compliance with the permit emission limits and must specify the monitoring frequency and respective test method for each pollutant.”</p>	<p>Condition 15 of the draft Title V permit already imposes annual particulate source testing. Condition 16 imposes additional testing. Conditions 15 and 17 specify the testing method and the testing procedures to be used. Therefore, the comment appears to already be addressed in the draft permit. No action is required in response to this comment.</p>
B	<p>“Periodic testing must be undertaken to confirm emission limits found in Condition 11. The required Relative Accuracy Test Audit (“RATA”) testing is understood to cover NOx and CO annual testing, but no testing is stipulated under Condition 11 for SO₂, PM10, and PM2.5. Testing conditions for these pollutants must be identified and made federally and practically enforceable within the permit.”</p>	<p>Condition 16 of the draft Title V permit addresses periodic testing for the PM₁₀ emission limit in condition 11. PM₁₀ and PM_{2.5} emission rates are anticipated to be so similar that separate testing is not deemed necessary for PM_{2.5} at this time. Because these testing conditions are contained in the title V permit and not identified as “state only,” they are considered federally and practically enforceable. The commenter is correct that SO₂ testing is not required under the draft permit. We believe that it is appropriate to add testing for SO₂ to condition 16 of the draft permit.</p>
B	<p>“Emission limits must be federally enforceable. Here there is no way to verify that emissions would comply with the ROG emission limits or the determination that RFP is a minor source for HAPs. The permit must require at least annual source testing for ROG emissions from the boiler to demonstrate compliance with the permit emission limits and must specify the monitoring frequency and respective test method or surrogate test method.”</p>	<p>The commenter is correct that ROG testing is not required under the draft permit. We believe that it is appropriate to add testing for ROG to condition 16 of the draft permit. However, we do not believe that it is appropriate to require annual testing of ROGs given the low emission rates. If testing demonstrates that emission rates were underestimated, then testing frequency can be increased.</p>
B	<p>“Annual stack testing for ROG emissions can serve as a surrogate for HAP. However, this surrogate measure must be adequately demonstrated and documented.”</p>	<p>As noted in response to the previous comment, annual ROG testing is not appropriate for this boiler given its low potential to emit. Nor is it appropriate to impose ROG testing as a surrogate for HAP where the permit does not impose any applicable requirements based on organic HAP emission rates. No action is required in response to this comment.</p>

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B	<p>“The permit must require specified monitoring intervals for testing of Total Dissolved Solids (“TDS”) content in the makeup water and, similarly, should include periodic inspection of the cooling tower to ensure compliance with specified drift rate. We request that monthly analysis of TDS content be made a condition of the Title V permit.”</p>	<p>Response</p> <p>We do not believe that it is necessary or appropriate to require TDS monitoring. TDS emissions were very conservatively calculated and the potential to emit was less than 1 ton per year. This level of potential to emit does not justify monthly TDS analysis. However, a requirement to inspect the cooling tower as part of the annual boiler shutdown has been added to the permit.</p>
B	<p>“The proposed weekly visual surveys for fugitive dust are not adequately protective and are not practically enforceable.”</p>	<p>Visible emissions surveys are a standard means of monitoring compliance with fugitive emission opacity standards. The surveys are practically enforceable as the air district can easily determine whether the surveys have or have not been performed and air district staff can compare their own observations to those of facility staff. No action is required in response to this comment.</p> <p>The draft permit includes conditions 3, which applies to fugitive emissions generally, and condition 66, which applies specifically to fugitive emissions from the material handling operations. There is no basis in the air district’s rules or other facility applicable requirements to prohibit visible fugitive emissions from migrating off site. Instead, Rule 4.1 requires that a source “shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three minutes in any one hour which is (A) dark or darker in shade as that designated as No.2 on the Ringelmann chart as published by the United States Bureau of Mines, or (B) Of such opacity as to obscure an observer’s view to a degree equal to or greater than does smoke described in subsection A. of this rule.” This requirement is stated in the draft permit and condition 67 ensures that compliance is adequately monitored. Therefore, we believe that no changes to the permit are necessary or appropriate.</p>
B	<p>“The District must require a permit condition that ensures that no visible fugitive emissions will migrate offsite, and that no fugitive emissions onsite shall exceed 40% opacity aggregated for more than three minutes in any hour.”</p>	

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B	<p>“The District shall require at least one RFP employee on-duty during routine working hours who maintains current California Air Resources Board (“CARB”) Visible Emissions Evaluation (“VEE”) certification in order to ensure that fugitive (or other) particulate matter emissions do not exceed opacity limits. Any public complaints of fugitive emissions from the RFP facilities shall be inspected by both the RFP VEE-certified employee and the Siskiyou County APCD, with inspection results made publicly available.”</p>	<p>It is not appropriate for the air district to require that Roseburg maintain an employee on-site during all routine working hours who holds a current CARB certified visible emissions evaluation (VEE) certificate. Roseburg may choose to do so, but so long as the company is able to comply with the periodic monitoring requirements then adding a further requirement to maintain a VEE certified reader during all routine working hours is not necessary or appropriate.</p> <p>It is not appropriate for the air district to place a requirement in Roseburg’s permit requiring that the air district respond to complaints. However, it is appropriate for the air district to add a requirement that Roseburg log and investigate any formal complaints submitted to the company within 48 hours of receipt. There is no reason to require that the company responder be VEE certified as a non-certified employee may be equally capable of identifying if a malfunction is occurring or other condition exists that is resulting in unusual offsite movement of fugitive particulate. We believe that the air district should require appropriate and expeditious response and not potentially delay response by insisting that it be performed by a VEE certified reader.</p>
B	<p>“The District shall include its Nuisance Rule (4-2) be included as a condition of the Title V permit, and noted within the permit (as required) that it is not federally enforceable.”</p>	<p>The air district’s nuisance rule is already included in the draft permit as condition 4. No further response is required.</p>

Exhibit	Comment	Response
B	<p>“What constitutes public nuisance is a subjective judgment. To avoid concerns by the public (again) that the Siskiyou APCD is not adequately responsive to public complaints regarding RFP emissions, we request that Siskiyou County APCD stipulate that two (2) simultaneous nuisance complaints, or five (5) public complaints per 24-hour period regarding RFP’s operations, are to be considered a public nuisance until proven otherwise by APCD enforcement personnel.”</p>	<p>There is no legal basis for what the commenter is requesting. What constitutes a nuisance involves a complex analysis that extends further than exclusively totaling the number of complaints over a particular time period. Therefore, the action requested by this comment is not appropriate.</p>
B	<p>“The SOB fails to provide an adequate discussion of how the temperature in the RCO relates to HAP emissions from the veneer dryer. This relationship must be established by testing. The Draft Permit does not contain adequate requirements.”</p>	<p>The requirement to monitor RCO temperature and the relationship of the temperature to HAP emissions is explained in the preamble to the Plywood and Composite Wood Products (Subpart DDDD) NESHAP. The draft permit reflects these federal requirements. As EPA stated in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, “In general, this program was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these requirements. Accordingly, operating permits and their accompanying applications should be vehicles for defining existing compliance obligations rather than for imposing new requirements or accomplishing other objectives.” The Title V permit is not the appropriate venue for establishing parametric monitoring requirements beyond those in the Subpart DDDD NESHAP.</p>

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B	<p>“With respect to the boiler, emission limits must be federally enforceable, <i>i.e.</i> periodic testing is required unless a surrogate is established.”</p>	<p>The pollutants of concern emitted by the boiler are PM₁₀, NOx and CO. CO and NOx are required by the permit to be continuously monitored. Opacity, an indicator of opacity, is also required by the permit to be continuously monitored. In addition, the permit mandates parametric monitoring of the PM₁₀ and NOx control devices. Specifically, draft condition 19.d establishes compliance assurance monitoring for PM₁₀ and condition 24 requires monitoring of performance of the SNCR. In summary, no further action is required based on this comment as the concern has been addressed.</p>
B	<p>“The COMS and Continuous Emissions Monitoring System (“CEMS”) must operate during startup and shutdown and emissions measured by these devices during those periods must be reported to the APCD. If emission limits applicable during other than startup and shutdown are exceeded during startup and shutdown the APCD should evaluate the need for startup and shutdown emission limits. The APCD may have enough continuous emissions data at this time to make that determination.”</p>	<p>The COMS and CEMS are required to be operated at all times (see, condition 19.a.i for COMS and condition 19.b.i for CEMS). This includes during periods of startup and shutdown. Therefore, the first half of this comment has been addressed. The remainder of the comment contemplates future limits. While the purpose of the Title V program is not to generate new substantive limits, this comment relates to suggested future actions and not to the issuance of the Title V permit at this point in time.</p>
B	<p>“All permit conditions should reference the basis for the condition. Some of the permit conditions do have a basis referenced, others do not.”</p>	<p>The basis is explicitly stated for all substantive requirements (identified in the draft permit as “Applicable Requirements”). Monitoring, recordkeeping or reporting requirements that are specified as part of an applicable rule are also identified. Monitoring, recordkeeping or reporting that has been added as “gap filling” have no associated reference. No action is required in response to this comment.</p>
B	<p>“The following condition [Condition 18] incorrectly references Appendix 8 instead of Appendix B to 40 CFR 60.”</p>	<p>The commenter is correct and this is clearly a typographical error. The permit should be amended so that condition 18 references Appendix B rather than Appendix 8.</p>

Exhibit	Comment	Response
B	<p>“The plans referred to in the following four conditions [21.a.iv, 24, 37 & 40] should be made attachments to the Title V permit and made available for public review during the Title V permit review process. Further, ‘ppmd’ [in condition 24] should be changed to ‘ppmvd.’”</p>	<p>The CEMS QA/QC Plan, the Emissions Monitoring Plan for the SNCR, the Startup, Shutdown and Malfunction Plan and the Veneer Dryer Fugitive Emissions Plan are maintained outside the permit. The requirement is to maintain the plans. The Title V permit does not incorporate the plans as substantive conditions of the permit. Therefore, it is not appropriate for the plans to be attached to the Title V permit. No action is required in response to this comment.</p> <p>The use of ppmvd as opposed to ppmvd is consistent with the ATC from which the applicable requirement derives. No action is required in response to this comment.</p> <p>The requirements in the Stationary Reciprocating Internal Engine NESHAP are extremely complicated and vary with the size and use of the particular engine. It is beyond the scope of the Title V to capture all possible requirements under the NESHAP. Incorporation of such requirements by reference is a common and acceptable approach with Title V permits. No action is required in response to this comment.</p>
B	<p>“For the following two conditions [72 & 75] the APCD is requested to provide more specific requirements as indicated below.”</p>	<p>The commenter is correct and it would be appropriate to add the ATCM to the permit. An appropriate way to address the requirement would be to identify it by reference consistent with the approach with the RICE NESHAP. Specifically, a new condition 73 reading as follows could be added to the permit:</p>
B	<p>“Although the California Air Resources Board (“CARB”) Airborne Toxic Control Measures (“ATCM”) for Stationary Diesel Fueled Internal Combustion Engines is not an applicable federal requirement, Table 11 should reference it and the Title V permit for RFP is requested to be conditioned to:</p> <ol style="list-style-type: none"> 1. Limit the annual hours of operation for maintenance and testing as required by the ATCM. 2. Require the recordkeeping specified in the ATCM.” 	<p>Applicable Requirement –TAPs: The permittee shall operate and maintain stationary internal combustion engines (Emission Unit G1) in compliance with the applicable sections of the CARB Airborne Toxic Control Measure for Stationary Diesel Fueled Internal Combustion Engines. [17 CCR section 93115]</p>

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C	<p>Public notice is biased because it states that the facility no longer has the potential to emit HAPs in excess of the major source threshold. This statement should not have been included in the public notice.</p>	<p>The statement in the public notice is factually correct and so does not create bias. The potential to emit of the stationary source addressed by the draft permit is limited to the equipment currently permitted to operate and reflects the required controls and other practically enforceable limitations. As explained in Section 5.2 of the Statement of Basis, the source's potential to emit hazardous air pollutants (HAP) is currently 5.96 tons/yr for the largest single HAP and 11.43 tons/year for aggregate HAP. The HAP major source threshold is 10 tons/year or more of any individual HAP or 25 tons/year of aggregate HAP. Any source with the potential to emit HAPs below these thresholds is considered an area source. Because the source's HAP potential to emit is well below the major source thresholds, it was factually accurate to identify the source as no longer having the potential to emit HAP above the major source thresholds. It was also appropriate to identify the mill's HAP area source status as some applicable requirements are determined based on that status. The mill did have the potential to emit HAP in excess of the major source thresholds when the Plywood and Composite Wood Products NESHAP (Subpart DDDD) took effect. Therefore, the mill will always be subject to the Subpart DDDD major source requirements even if its potential to emit subsequently decreases. Applicability of each subsequent area and major source NESHAP is freshly determined at the time the first substantive requirement takes effect under the NESHAP. This was explained in detail in EPA's May 16, 1995 guidance entitled <i>Potential to Emit for MACT Standards—Guidance on Timing Issues</i>, where the agency stated: "A facility that is subject to a MACT standard is not necessarily a major source for future MACT standards. For example, if after compliance with a MACT standard, a source's potential to emit is less than the 10/25 tons per year applicability level, the EPA will consider the facility an area source for purposes of a subsequent standard." Therefore, it is important to clearly identify the past and current area v. major source status of the mill. The public notice did so. No action is required in response to this comment.</p>

Exhibit	Comment	Response
C	The public notice did not identify the Title V permit number	The public notice identified that the draft Title V permit was available for public comment and stated that the application, proposed Title V Operating Permit and the District's Technical Review and Evaluation Report were available for inspection at the Siskiyou County Air Pollution Control District, 525 South Foothill Drive, Yreka, CA 96097 during regular business hours. The materials relating to the permit on public notice were also available and were accessed by the public. There is no requirement to identify a Title V permit number as part of the public notice for initial issuance of a Title V permit. No action is required in response to this comment.
C	The Roseburg facility was built without a use permit or building permit.	Roseburg Forest Products currently holds all permits necessary to construct and operate this facility, although the issuance of such permits is not a condition to issuance of the Title V permit. No action is required in response to this comment.
C	Roseburg requested a one-year extension for installation of control equipment required by the Subpart DDDD NESHAP and requested coverage under the Subpart DDDD Routine Control Device Maintenance Exemption.	The commenter is correct that Roseburg Forest Products applied for both a one-year extension for installation of control equipment required by the Subpart DDDD NESHAP and requested coverage under the Subpart DDDD Routine Control Device Maintenance Exemption. Both actions were in compliance with the applicable regulations and do not affect issuance of the Title V permit. No action is required in response to this comment.
C	Roseburg is not in compliance with all applicable requirements.	The District has spent considerable time performing an independent assessment of Roseburg Forest Product's compliance status. There is no evidence that the source is not currently in compliance with all applicable requirements. No action is required in response to this comment.
C	The ATC application for the boiler cooling tower did not include TDS data.	The boiler ATC was issued in June 2009 and is not the subject of this public comment period. PM10 emissions from the cooling tower were calculated during the permitting process that resulted in the 2009 ATC and relied upon methodology substantially similar to what is described in this comment including site specific water analysis for total dissolved solids. The commenter refers to documents that were not relied upon for issuance of the 2009 ATC. No action is required in response to this comment.

Exhibit	Comment	Response
D	Request that highest standards of air quality controls and monitoring be applied at this site.	<p>The purpose of Title V is not to add any new requirements beyond those in the existing permits. As EPA stated in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, "In general, this program was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements. Accordingly, operating permits and their accompanying applications should be vehicles for defining existing compliance obligations rather than for imposing new requirements or accomplishing other objectives." Consistent with this mandate, new air quality controls are not under consideration as part of issuance of this Title V permit. Monitoring requirements have been included in the Title V permit where additional monitoring was required in order for there to be a reasonable basis for determining compliance. No action is required in response to this comment.</p>
<p>Written Testimony: John Brennan</p>	<p>Request that BACT be required for all emission sources (This duplicates Exhibit A as the email constituting Exhibit A was read into the record. The comment and response is included for completeness.)</p>	<p>The purpose of Title V is not to add any new requirements beyond those in the existing permits. As EPA stated in the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, "In general, this program was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements. Accordingly, operating permits and their accompanying applications should be vehicles for defining existing compliance obligations rather than for imposing new requirements or accomplishing other objectives." BACT has been assessed and imposed, where appropriate, as part of the construction permitting process. BACT cannot be imposed as an element of Title V permitting. No action is required in response to this comment.</p>
<p>Oral Testimony: Karen Rogers</p>	<p>Please verify that all of the permits related to air emissions at the facility have been incorporated into the Title V permit</p>	<p>The purpose of Title V is to identify and record existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements. Accordingly, the Title V permit includes all conditions in the existing Authorities to Construct and Permits to Operate unless those conditions are no longer relevant (e.g., an initial one-time notice requirement that has been completed) or that have been superseded by subsequent conditions. No action is required in response to this comment.</p>

Exhibit	Comment	Response
<p>Oral Testimony: Anne Marsh</p>	<p>Roseburg was not historically in compliance with all requirements</p>	<p>The District has spent considerable time performing an independent assessment of Roseburg Forest Products's current compliance status. There is no evidence that the source is not currently in compliance with all applicable requirements. What is required in order to issue the Title V permit is an assessment of current compliance. Historical noncompliance that has been fully resolved, as is believed to be the case for Roseburg Forest Products, does not impact issuance of the permit. No action is required in response to this comment.</p>
<p>Oral Testimony: Anne Marsh</p>	<p>The Title V permit should require monitoring of total dissolved solids (TDS) content in the cooling water.</p>	<p>The cooling tower emissions are minimal and the imposition of additional monitoring of the TDS levels is not warranted as a condition of the Title V permit. No action is required in response to this comment.</p>
<p>Oral Testimony: Anne Marsh</p>	<p>The NOx emission increase evaluated as part of the CEQA and ATC process leading up to issuance of the ATC in June 2009 should be re-evaluated prior to issuance of the Title V permit.</p>	<p>The purpose of issuing the Title V permit is to capture those applicable requirements that were determined to be relevant to the permitted source. The 2009 Boiler ATC has been comprehensively reviewed by the air district and the courts and there is no basis at this time to reopen the evaluations underlying that permit's issuance. No action is required in response to this comment.</p>

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**Permits Office Air-3
U.S. EPA, Region 9**

**PUBLIC NOTICE
PROPOSED ISSUANCE OF TITLE V OPERATING PERMIT
TO ROSEBURG FOREST PRODUCTS CO.**

Pursuant to Rule 2.13 of the Siskiyou County Air Pollution Control District (District) Rules and Regulations, the Air Pollution Control Officer (APCO) has made a preliminary decision to issue an Operating Permit under Title V of the Federal Clean Air Act Amendments of 1990 to Roseburg Forest Products Co., which operates a veneer peeling and drying plant and associated biomass-fired cogeneration facility located at 98 Mill St. in Weed, California. The facility is a major source for nitrogen oxides and carbon monoxide and veneer drying operations are regulated based on the mill being a major source of hazardous air pollutants (although the facility no longer has the potential to emit hazardous air pollutants above the major source thresholds) and is subject to the Title V permitting program. This proposed permitting action is to issue an initial Title V Operating Permit for the Weed facility and does not involve any change to the facility. The proposed Title V Operating Permit is a compilation of all existing applicable local, state and federal air quality requirements including emissions limits and standards, monitoring, record keeping, and reporting requirements. The facility is currently operating in compliance with all applicable requirements.

Written comments regarding the proposed decision may be submitted to the District within the public comment period. The public comment period will extend until the close of the public hearing described below. Any comments received before the end of the public comment period will be considered prior to the final determination by the APCO to issue the permit. Comments submitted by mail must be postmarked on or before the date of the public hearing in order to be considered.

The APCO will preside over a public hearing for the purpose of hearing oral public comments on this proposed decision on May 21, 2012. The hearing will start at 1:00 pm and end either at 4:00 pm or when all oral testimony has been received, whichever is later. The public hearing will take place at 525 South Foothill Drive Yreka Ca. District staff will be available for 30 minutes prior to the start of the hearing to discuss the proposed Title V Operating Permit informally and answer any questions. The purpose of the formal public hearing is to receive oral and written testimony from the public. In order to ensure that each person has an opportunity to express their testimony, speakers will be limited to three minutes each. A person may speak more than once, but all persons who wish to do so will be allowed to speak for up to three minutes before any person is allowed to speak a second time.

The application, proposed Title V Operating Permit and the District's Technical Review and Evaluation Report are available for inspection at the Siskiyou County Air Pollution Control District, 525 South Foothill Drive, Yreka, CA 96097 during regular business hours. The proposed Title V Operating Permit and Technical Review and Evaluation Report set forth the legal and factual basis of the permit conditions contained in the proposed permit.

Written comments on the proposed decision, or a request, may be mailed or hand carried to the District at the above location. Written comments may also be submitted at the public hearing.

Should you have any questions regarding this notice or wish to make an appointment to review documents related to this action, please contact Eldon Beck at (530) 841-4029.

After the closure of this comment period, the District will provide the U.S. Environmental Protection Agency (EPA) with a 45-day review and objection period for this proposed decision. If the U.S. EPA Administrator does not object in writing, any person may petition US EPA, Region IX, Operating Permits Section at 75 Hawthorne Street, San Francisco, CA 94105, to make such objection within 60 days after the end of the U.S. EPA review period. Any such petition shall be based only on objections to the Title V Operating Permit that were raised with reasonable specificity during the public comment period for this proposed decision, unless the petitioner demonstrates that it was impracticable to raise such objections within such period or that the grounds for such objection arose after such period.



Patrick J. Griffin
Air Pollution Control Officer
April 11, 2012