



# COUNTY OF SISKIYOU

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## AIR POLLUTION CONTROL DISTRICT

525 SOUTH FOOTHILL DRIVE  
YREKA, CALIFORNIA 96097-3090  
PHONE: (530) 841-4029  
FAX: (530) 842-6690

PATRICK J. GRIFFIN  
*Air Pollution Control Officer*  
ELDON BECK  
*Assistant Air Pollution Control Officer*

# Title V Operational Permit

IS HEREBY GRANTED TO

**ROSEBURG FOREST PRODUCTS CO.**

TVOP 030912

### Owner

Roseburg Forest Products Co.  
P.O. Box 1088  
Roseburg, Oregon 97470  
Phone: (541) 679-3311  
Fax: (541) 679-9683

### Operator

Roseburg Forest Products Co.  
98 Mill Street  
Weed, California 96094  
Phone: (530) 938-5723  
Fax: (530) 938-2678

**EQUIPMENT LOCATION:** 98 Mill Street, Weed California 96094

**EQUIPMENT DESCRIPTION:** See Table 2

**FACILITY THROUGHPUT:** Maximum process rate 249,660 MSF (3/8" basis)/yr.

**EXPIRATION DATE:** 5 years from date of issuance

**RECEIVED**

**MAY 07 2013**

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

**FINAL DRAFT**

**TABLE OF CONTENTS**

**LIST OF TABLES** ..... 3

**LIST OF APPENDICES** ..... 3

**LIST OF DEFINITIONS** ..... 4

**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT** ..... 6

**INSIGNIFICANT ACTIVITIES** ..... 7

**SIGNIFICANT EQUIPMENT EMISSIONS** ..... 8

    Permitted Activities ..... 8

    Emission Limits and Standards, Testing, Monitoring, and Recordkeeping Requirements ..... 9

    Facility-Wide Requirements ..... 9

    Emission Unit B1 (Boiler) Requirements ..... 11

    Emission Units D3, and D4 (Veneer Dryers) Requirements ..... 20

    Emission Units C1, C2, C3, C4, and C5 (Cyclone) Requirements ..... 26

    Emission Unit SV1 (Log Vats) Requirements ..... 29

    Emission Unit F1 (Material Handling Fugitives) Requirements ..... 32

    Emission Unit G1 (Stationary Internal Combustion Engines/Generators) Requirements ..... 33

**REPORTING REQUIREMENTS** ..... 36

**PERMIT DURATION** ..... 36

**BREAKDOWN CONDITIONS** ..... 36

**EMERGENCY PROVISIONS** ..... 37

**PERMIT MODIFICATIONS** ..... 38

    Minor Permit Modifications ..... 38

    Significant Permit Modifications ..... 39

**DISTRICT ACTION ON WRITTEN REQUESTS** ..... 39

**OPERATIONAL FLEXIBILITY** ..... 40

**GENERAL OPERATIONAL STANDARDS** ..... 41

**LIST OF TABLES**

TABLE 1 INSIGNIFICANT ACTIVITIES .....7

TABLE 2 SIGNIFICANT EQUIPMENT EMISSIONS .....8

TABLE 3 FACILITY WIDE EMISSION LIMITS AND STANDARDS .....9

TABLE 4 EMISSION UNIT B1 (BOILER) REQUIREMENTS .....11

TABLE 5 SUMMARY REPORT- GASEOUS AND OPACITY EXCESS EMISSION AND MONITORING  
SYSTEM PERFORMANCE .....18

TABLE 6 EMISSION UNITS D3 – D4 (VENEER DRYER) REQUIREMENTS .....20

TABLE 7 PROCESS WEIGHTS AND EMISSION RATES FOR DRYERS, CYCLONES, & STEAM VAT .....21

TABLE 8 EMISSION UNITS C1 – C5 (CYCLONE) REQUIREMENTS .....26

TABLE 9 PROCESS WEIGHTS AND EMISSION RATES FOR DRYERS, CYCLONES, & STEAM VAT .....26

TABLE 10 EMISSION UNIT SV1 (LOG VATS) REQUIREMENTS .....29

TABLE 11 PROCESS WEIGHTS AND EMISSION RATES FOR DRYERS, CYCLONES, & STEAM VAT .....29

TABLE 12 EMISSION UNIT F1 (MATERIAL HANDLING FUGITIVES) EMISSION LIMITS AND  
STANDARDS .....32

TABLE 13 EMISSION UNIT G1 (STATIONARY INTERNAL COMBUSTION ENGINES/GENERATORS)  
REQUIREMENTS .....33

**LIST OF APPENDICES**

APPENDIX A COMPLIANCE ASSURANCE MONITORING (CAM) .....46

### LIST OF DEFINITIONS

1. **acfm**: actual cubic feet per minute
2. **APCO**: the Air Pollution Control Officer
3. **Calendar Day**: Any continuous 24-hour period beginning at 12:00 AM or 0000 hours
4. **California Air Resources Board (CARB) Diesel Fuel**: Any diesel fuel that is commonly or commercially known, sold, or represented as diesel fuel, including any mixture of primarily liquid hydrocarbons – organic compounds consisting exclusively of the elements carbon and hydrogen – that is sold or represented as suitable for use in an internal combustion, compression-ignition engine, and that meets the specifications defined in Title 13 CCR, sections 2281, 2282 and 2284.
5. **CAM Plan**: Compliance Assurance Monitoring Plan, as defined in 40 CFR 64
6. **CARB**: the California Air Resources Board
7. **CEMS**: Continuous Emissions Monitoring System
8. **CFR**: the Code of Federal Regulations
9. **COMS**: Continuous Opacity Monitoring System
10. **CO**: Carbon Monoxide
11. **Diesel Particulate Matter (DPM)**: filterable particulate matter (PM) measured using EPA method 5
12. **Diesel ATCM**: the latest adoption of the Final Regulation Order of the Airborne Toxic Control Measure for Stationary Compression Ignition Engines, Section 93 115, title 17, of the California Code of Regulations.
13. **District**: Siskiyou County Air Pollution Control District
14. **dscfm**: dry standard cubic feet per minute
15. **Emergency**: an "emergency" is any situation arising from a sudden and reasonably unforeseeable event beyond the control of the permittee (e.g., an act of God) which causes the exceedance of a technology-based emission limitation, under a permit, that requires immediate corrective action to restore compliance. An "emergency" shall not include noncompliance as a result of improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
16. **EPA**: the United States Environmental Protection Agency
17. **ESP**: Electrostatic Precipitator
18. **Facility**: the site of the Roseburg Forest Products, Weed facility
19. **Heat Input**: the energy (heat) input of the fuel combusted at the higher heating value (HHV) of the fuel
20. **hr**: one hour - a standard measurement of time
21. **H&SC**: California Health and Safety Code
22. **lb**: pound - an English unit of measurement of weight and mass being equivalent to 7000 grains, 16 ounces, and 0.453 kilograms
23. **SCAPCD**: Siskiyou County Air Pollution Control District
24. **Notice**: unless otherwise stated, shall be in writing, sent postage prepaid, to the APCO and include all information required. Notices shall be sent to the APCO at the following address: 525 S. Foothill Dr, Yreka, CA 96097
25. **NO<sub>x</sub>**: Nitrogen Oxides
26. **O<sub>2</sub>**: Oxygen

27. **Permittee:** the owner or operator identified on the Permit title page
28. **Plume:** means a visible or measurable discharge of a contaminant from a given point of origin that can be measured according to the Ringelmann Chart.
29. **PM:** Particulate Matter
30. **ppmvd:** parts per million, volumetric dry
31. **Responsible Official:** person(s) who have direct authority or control to affect operations of the equipment authorized pursuant to this Permit, and who have the ability to certify that a source complies with all applicable federal requirements and federally enforceable permit conditions as generally defined in District Rule 101 § 1.244
32. **Ringelmann Chart:** is a series of charts, numbered 0 to 5, that simulate various smoke densities by presenting different percentages of black. A Ringelmann No. 1 is equivalent to 20 % black; a Ringelmann 5 is 100 % black. They are used for measuring the opacity of black smoke or equivalent obscuration of white colored smoke arising from stacks and other sources matching the actual effluent with the various numbers, or densities, indicated by the charts.
33. **Quarter:** calendar quarter, consisting of the following Q1 - January through March; Q2 - April through June; Q3 - July through September; Q4 - October through December
34. **VEE:** Visible Emissions Evaluation
35. **Year:** Any consecutive twelve-month period of time
36. **Unadulterated Wood:** Unadulterated wood shall be defined as the following: Any wood or wood products that have not been painted, pigment-stained, or pressure treated with compounds such as chromate copper arsenate, pentachlorophenol, and creosote. Plywood, particleboard, oriented strand board, and other types of wood products bound by glues and resins are not considered unadulterated wood and are prohibited from being used as a boiler fuel.

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

40 CFR 60	Chapter 40 of the Code of Federal Regulations, Part 60	lb/MMbtu	Pounds per million British thermal units
abs	Absolute	MSF <sub>(3/8" basis)</sub>	Thousand square feet of 3/8" thick veneer
acfm	Actual cubic feet per minute	ng/J	Nanogram/joule
APCO	Air Pollution Control Officer	NO <sub>x</sub>	Nitrogen oxides
ARB	Air Resource Board	NO <sub>2</sub>	Nitrogen dioxide
Board	Board of Supervisors	NSPS	New Source Performance Standard (40 CFR 60)
Btu	British thermal unit	O <sub>2</sub>	Oxygen
CAA	Federal Clean Air Act	PM	Particulate matter
CCR	California Code of Regulations	PM <sub>10</sub>	Particulate matter less than 10 microns in size
CEMS	Continuous emissions monitoring system	ppm	Parts per million
CFC	Chlorofluorocarbon	QA	Quality Assurance
CFR	Code of Federal Regulations	RATA	Relative Accuracy Test Audit
CO	Carbon Monoxide	ROC	Reactive Organic Compounds
COMS	Continuous opacity monitoring system	RFP	Roseburg Forest Products Weed facility
CO <sub>2</sub>	Carbon Dioxide	SCAPCD	Siskiyou County Air Pollution Control District
diam	Diameter	scf	Standard cubic feet
District	Siskiyou County Air Pollution Control District	scfh	Standard cubic feet per hour
EPA	US Environmental Protection Agency	sf	Square feet
FOP	Federal Operating Permit	SIC	Standard Industrial Classification
FR	Federal Register	SIP	State of California Implementation Plan
gr/dscf	Grains per dry standard cubic foot	SO <sub>x</sub>	Sulfur oxides
HAP	Hazardous Air Pollutant as defined by section 112(b) of the CAA	SO <sub>2</sub>	Sulfur dioxide
HCFC	Hydrochlorofluorocarbon	tpy	Tons per year
HF	Hogged Fuel	VOC	Volatile organic compounds
hr	Hour		
H&SC	California Health and Safety Code		
lb/hr	Pounds per hour		

**INSIGNIFICANT ACTIVITIES**

1. The equipment listed in Table 1 are considered insignificant sources of air emissions. This determination was made pursuant to District Rule 2.13 IV [C][1][q].

**Table 1 – Insignificant Activities**

Description	Capacity	Basis
Storage Tanks – Waste Oil Tanks, Bulk Hydraulic Fluid Tank, Motor Oil Tanks	N/A	District Rule 2.13 IV [C][1][q]
Hand-Held Equipment – Buffing; Polishing; Cutting; Drilling; Grinding; Turning or Machining wood, metal or plastic	N/A	District Rule 2.13 IV [C][1][q]
Passenger Vehicles – Fugitive dust emissions	N/A	District Rule 2.13 IV [C][1][q]
Equipment associated with repair and maintenance shop activities	N/A	District Rule 2.13 IV [C][1][q]
Equipment associated with plant maintenance and up-keeping activities	N/A	District Rule 2.13 IV [C][1][q]
Diesel Storage Tank	12,000 gallons	District Rule 2.13 IV [C][1][q]
Landscape timber product (peeler cores) spray booth	N/A	District Rule 2.13 IV [C][1][q]

**SIGNIFICANT EQUIPMENT EMISSIONS**

**Permitted Activities**

2. The equipment listed in Table 2 are considered significant sources of air emissions.

**Table 2 – Significant Equipment Emissions**

EU ID	Emission Unit Description	Manufacturer	Capacity
B1	<b>Boiler</b>	Foster Wheeler	130,000 lbs steam / hr
	Selective Non-Catalytic Reduction (SNCR)		
	Multiclone (MC1)	Zurn Multiclone	
	Electrostatic Precipitator (ESP1)	PPC Industries	
CT1	<b>Cooling Tower</b>	Midwest Towers	N/A
D3	<b>Veneer Dryer #3</b>	Moore Dry Kiln Co.	10,000 SF (3/8" basis) / hr
	Regenerative Catalytic Oxidizer (RCO1)	Geoenergy GeoCat	
D4	<b>Veneer Dryer #4</b>	Moore Dry Kiln Co.	18,500 SF (3/8" basis) / hr
	Regenerative Catalytic Oxidizer (RCO1)	Geoenergy GeoCat	
C1	<b>Truck Unload/Transfer Cyclone</b> (Material Handling)	None	N/A
C2	<b>Fines Cyclone</b> (Material Handling)	None	N/A
C3	<b>Chip Bin Cyclone</b> (Material Handling)	None	N/A
C4	<b>Cleanup/Spillage Cyclone</b> (Material Handling)	None	N/A
C5	<b>Clipper/Diverter Cyclone</b> (Material Handling)	None	N/A
F1	<b>Material Handling Fugitives</b> (Log Debarker, Chipper, Hog, Hogged Fuel Piles, Chip Piles)		N/A
G1	<b>Stationary Internal Combustion Engines/ Generators</b>		
LV1	<b>Log Vats</b>	None	60,000 SF (3/8" basis)/hr

## Emission Limits and Standards, Testing, Monitoring, and Recordkeeping Requirements

The following tables and conditions contain the applicable requirements, along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

### Facility-Wide Requirements

Table 3 – Facility-Wide Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition	Federally Enforceable ?
District Rule 4.1	3	Fugitive Emissions	Ringelmann 2 for any 3-minute period in one hour	NA	NA	Y
District Rule 4.2(A)	4	Air Contaminants	Not cause a nuisance	NA	6	N
Title 13 CCR sections 2281, 2282 and 2284, Title 17 CCR 93114	5	Sulfur Content of Fuels	15 ppm or less	NA	NA	Y

3. **Applicable Requirement – Fugitive Emissions:** With respect to Fugitive Emissions, the permittee shall not discharge into the atmosphere from any single source of emissions whatsoever, any contaminant for a period or periods aggregating more than 3 minutes in any one hour which is: *[District Rule 4.1]*
- a. as dark or darker in shade as that designated as No.2 in the Ringelmann chart, as published by the United States Bureau of Mines;
  - b. of such opacity as to obscure an observer's view to a degree equal to, or greater than, smoke as described in Condition 3a above. The following is a list of some, but not all, sources for fugitive emissions at this facility:
    - i. Dust on roadways;
    - ii. Blowing sawdust;
    - iii. Handling of Fly Ash; and
    - iv. Leaking exhaust lines.
4. **Applicable Requirement – Nuisance Condition:** The permittee shall not discharge from any source whatsoever, such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property. *[District Rule 4.2(A)]* This condition is not federally enforceable.
5. **Applicable Requirement - Sulfur Content of Fuels:** The permittee shall not burn any liquid or solid fuel having a sulfur content in excess of 15 ppm by weight. *[Title 13 CCR sections 2281, 2282 and 2284, Title 17 CCR 93114]*

Roseburg Forest Products  
Title V Permit Number TVOP 030912  
Expiration Date: 5 years from date of issuance

6. **Monitoring Requirement – Nuisance Condition:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, and status of plant operation during the observed period. A plant representative must investigate the condition within 48 hours of receipt of the nuisance complaint. *[District Rule 2.7]* This condition is not federally enforceable.

Emission Unit B1 (Boiler) Requirements

Table 4 – Emission Units B1 (Boiler) and CT1 (Cooling Tower) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Testing Condition	Monitoring Condition	Monitoring/Frequency	Reporting	Federally Enforceable?
40 CFR 60.43b(f)	7	Opacity Limitations	20%, except for one 6 minute period per hr of <27% (6 minute average)	N/A	20.a, 21	COMS at all times	Semi-annual	Y
40 CFR 60.43b(h)(3) -and- District Rule 4.4 (B)(2)	8	PM	43 ng / J (0.10 lb/MMBtu) heat input -and- 0.20 gr / scf	16	N/A	N/A	Annual	Y
District Rule 2.7	9	Fuel Type	Unadulterated Wood	N/A	N/A	N/A	Annual	Y
	10	Steam Production	130,000 lbs/hr (24-hour average)	N/A	24	Continuously	Annual	Y
	11	Pollution Control and Monitoring Equipment	Use at all times; ESP & SNCR need not operate during startup/ shutdown	N/A	25	Based on parametric data	Annual	Y
	13	Pollution Control Equipment	Operate per manufacturer's specs	N/A	27, 28	N/A	Annual	Y
	14	Hex Chrome	Prohibited in cooling towers	N/A	N/A	N/A	Annual	Y
	District Rule 2.10	12	PM <sub>10</sub>  PM <sub>2.5</sub>  NO <sub>x</sub>  CO  ROG  SO <sub>2</sub>	61 lbs/day, 0.023 lbs/Mlbs-steam  57 lbs/day, 0.022 lbs/Mlbs-steam  677 lbs/day, 0.26 lbs/Mlbs-steam  2,360 lbs/day, 0.85 lbs/Mlbs-steam  92.2 lbs/day, 0.035 lbs/Mlbs-steam  136 lbs/day, 0.052 lbs/Mlbs-steam	17, 18, 19	20.b, 20.c, 22, 26	Continuous (CO & NO <sub>x</sub> daily limit) Periodic testing (PM <sub>10</sub> , CO & NO <sub>x</sub> lbs/Mlbs-steam limits) 3-hour average (CO & NO <sub>x</sub> ) 6-hour average (PM <sub>10</sub> )	Annual
40 CFR Part 63, Subpart JJJJJJ	15	Area Source Boiler NESHAP	Comply with work practice standards	N/A	N/A	N/A	Annual	Y

7. **Applicable Requirement - Opacity:** The permittee shall not cause or allow to be discharged into the atmosphere from Emission Unit B1 (Boiler) any gases that exhibit greater than 20 % opacity (6-minute average), except for one 6-minute period per hour of not more than 27 % opacity. This standard applies at all times, except during periods of start up, shutdown, or malfunction. [40 CFR 60.43b(f)]
8. **Applicable Requirement - Particulate Matter:**
- a. The permittee shall not cause or allow to be discharged from Emission Unit B1 (Boiler) any gases that contain particulate matter in excess of 43 ng / J (0.10 lbs/ MMBtu) [40 CFR 60.43b(h)(3)]; and
  - b. The permittee shall not cause or allow to be discharged from Emission Unit B1 (Boiler) any gases that exceed 0.20 grains of particulate per cubic foot of exhaust gas calculated to 12% carbon dioxide, at standard conditions. [District Rule 4.4.B.2]
  - c. The standards in conditions 8.a and 8.b apply at all times, except during periods of start up, shutdown, or malfunction. [40 CFR 60.46b(a)]
9. **Applicable Requirement – Unadulterated Wood:** The permittee shall fire Emission Unit B1 (Boiler) only on unadulterated wood, which means wood products that have not been painted, pigment-stained, or pressure treated with compounds such as chromate copper arsenate, pentachlorophenol, and creosote. Plywood, particleboard, oriented strand board, and other types of wood products bound by glues and resins are not considered unadulterated wood and are prohibited from being used as a fuel for the boiler. [District Rule 2.7]
10. **Applicable Requirement – Steam Production:** The permittee shall not allow the Emission Unit B1 (Boiler) steam production rate to exceed a 24-hour average of 130,000 pounds per hour. [District Rule 2.7]
11. **Applicable Requirement – Control and Monitoring Equipment:** The permittee shall use the air pollution control and monitoring equipment for Emission Unit B1 (Boiler) at all times when the combustion process is occurring in the boiler except that the electrostatic precipitator and selective non-catalytic reduction need not be operated during periods of startup and shutdown. Air pollution control and monitoring equipment for Emission Unit B1 (Boiler) has been defined as the following: [District Rule 2.7 and 2.10]
- a. Fly ash reinjection
  - b. Multiclone collector
  - c. Electrostatic precipitator
  - d. Combustion controls
  - e. Selective non-catalytic reduction
  - f. CEMS for NO<sub>x</sub>, CO, O<sub>2</sub> and opacity
  - g. Flow rate monitor
12. **Applicable Requirement – Emissions Limits:** The permittee shall not cause or allow to be discharged from Emission Unit B1 (Boiler) any gases that exceed the following emission limits during all periods other than start up, shutdown or malfunction: [District Rule 2.7]
- a. PM<sub>10</sub>: 61 lbs/day and 0.023 lbs/Mlbs-steam
  - b. PM<sub>2.5</sub>: 57 lbs/day and 0.022 lbs/Mlbs-steam
  - c. NO<sub>x</sub>: 677 lbs/day and 0.26 lbs/Mlbs-steam
  - d. CO: 2,360 lbs/day and 0.850 lbs/Mlbs-steam
  - e. ROG: 92.2 lbs/day and 0.035 lbs/Mlbs-steam
  - f. SO<sub>2</sub>: 136 lbs/day and 0.052 lbs/Mlbs-steam
13. **Applicable Requirement –** The permittee shall operate all pollution control equipment identified in condition 11 per manufacturer's specifications. [District Rule 2.7]

14. **Applicable Requirement** – The permittee shall not add any hexavalent chromium containing chemicals or any compound that may produce hexavalent chromium to the boiler cooling tower. *[District Rule 8.4(C)(1)]*
15. **Applicable Requirement** – The permittee shall comply with the applicable work practice standards, emission reduction measures and management practices and the notification, reporting and recordkeeping requirements required for existing biomass fired boilers by the area source boiler NESHAP of 40 CFR Part 63, Subpart JJJJJ commencing by the deadlines stated in the rule. *[40 CFR 63.11201, Table 2 and 40 CFR 63.11225]*
16. **Testing Requirement – Particulate Matter:** The Permittee shall demonstrate compliance with the particulate matter limit of Condition 8 using the following method: *[District Rule 2.7 and 2.10]*
  - a. EPA Method 5
  - b. The Permittee shall be required to have particulate matter emissions from the Device B-1 (Boiler) tested once per calendar year.
17. **Testing Requirement – Steam Based Limits:** At least once per permit term the permittee shall conduct a performance test to demonstrate compliance with the pound per thousand pound steam limits in Conditions 12.a, 12.c, 12.d, 12.e, and 12.f. Compliance shall be determined based on the average of three valid testing runs. *[District Rule 2.7 and 2.10]*
18. **Testing Requirements – General:**
  - a. The permittee shall provide, or cause to be provided, performance testing facilities on Emission Unit B1 (Boiler) as follows *[40 CFR 60.8(e)]*:
    - i. Sampling ports adequate for the test methods applicable to the facility. This includes:
      - A. Constructing an air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and,
      - B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
    - ii. Safe sampling platforms(s);
    - iii. Safe access to sampling and testing equipment; and
    - iv. Utilities for sampling and testing equipment.
  - b. The permittee shall submit any performance test protocol to the District not later than 30 days prior to the scheduled test start date. The permittee shall also submit any performance test protocol required to demonstrate compliance with conditions 7 or 8.a to EPA Region 9. *[40 CFR 60.8(d); District Rule 2.10]*
  - c. The permittee shall submit the results of any performance test to the District within 60 days of completion of testing. The results of any performance test conducted to demonstrate compliance with conditions 7 or 8.a shall also be sent to EPA Region 9. *[District Rule 2.7]*
  - d. Emission Unit B1 (Boiler) shall be tested at 90 percent of maximum steam production capacity or greater, utilizing standard wood fuel blends. *[District Rule 2.7]*
19. **Testing Requirement – CEMS:** Relative accuracy test audits (RATAs) shall be performed on each CEMS at least once every twelve months, in accordance with the requirements of Appendix B to 40 CFR 60. Calibration Gas Audits of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guide lines. The APCO shall

be notified in writing at least 10 days in advance of the scheduled date of the audits. Audit reports shall be submitted to the APCO within 60 days after the testing was performed. [40 CFR 60, Appendix B]

20. **Monitoring Requirements – Compliance with Emission Limits:** The Permittee shall demonstrate compliance with the emission unit B-1 (Boiler) emission limits identified in this permit using the following methods:
- a. **Visible Emissions:**
    - i. The Permittee shall operate at all times and maintain a continuous opacity monitoring system (COMS). [40 CFR 60.48b(a)]
    - ii. The COMS shall be operated in conformance with 40 CFR 60, Appendix B, Performance Specification 1. [40 CFR 60.49b(b)]
    - iii. The COMS will automatically, intrinsic to the opacity monitor, check the zero and upscale (span) calibration drifts at least once daily.
    - iv. The optical surfaces exposed to the effluent gases must be cleaned before performing the zero and upscale drift adjustments.
    - v. For systems using automatic zero adjustments, the optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4% opacity. [40 CFR 60.13(d)(1)]
  - b. **Carbon Monoxide, Nitrogen Oxides, Flow and Oxygen:**
    - i. The Permittee shall operate at all times and maintain a continuous emissions monitoring system (CEMS) for the determination of carbon monoxide, nitrogen oxides, exhaust gas flow and oxygen from the Device B-1 (Boiler).
    - ii. The CEMS shall be operated in conformance with 40 CFR 60, Appendix B, Performance Specifications and Appendix F, Quality Assurance Procedures.
    - iii. Monitoring shall be conducted in accordance with 40 CFR 60.13.
  - c. **Annual Relative Accuracy Test Audit (RATA):**
    - i. In order to verify compliance with emissions limits, the Permittee shall perform an annual Relative Accuracy Test Audit (RATA) for Carbon Monoxide, Nitrogen Oxides and Oxygen on the CEMS, in accordance with 40 CFR Appendix F.
  - d. **ESP – CAM for Particulate:** [40 CFR 64.3], See Appendix A.
    - i. Within 180 days of permit issuance, the secondary current will be maintained at or above the minimum current level required to generate corona, determined by the generation and extrapolation of the V/I curve during startup on the test fuel.
    - ii. Within 180 days of permit issuance, the secondary voltage will be maintained at or above 110% of the minimum voltage level required to generate corona, determined by the generation and extrapolation of the V/I curve during startup on the test fuel.
21. **Monitoring and Recordkeeping Requirements - COMS:**
- a. The permittee shall install, calibrate, maintain and operate a COMS for measuring the opacity of emissions discharged to the atmosphere from Emission Unit B1 (Boiler) at all times the emission unit is in operation and record the output of the system. The COMS shall be designed and operated in conformance with 40 CFR 60, Appendix B, Performance Specification 1. [40 CFR 60.48b(a)]
  - b. The COMS measuring the opacity of emissions from Emission Unit B1 (Boiler) shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. [40 CFR 60.13(e)(1)]
  - c. The permittee shall cause the COMS to reduce all data to 6-minute averages. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period. [40 CFR 60.13 (h)]

- d. The span value of the COMS shall be between 60 and 80 %. [40 CFR 60.48b(e)(1)]
22. **Monitoring and Recordkeeping Requirements - CEMS:** The permittee shall maintain in good working order and operate an in-stack continuous emission monitoring system (CEMS) on the Emission Unit B1 (Boiler) exhaust to demonstrate compliance with the daily CO and NO<sub>x</sub> emission limits in conditions 12.c and 12.d. The in-stack continuous emission monitoring system shall continuously monitor and record CO, NO<sub>x</sub>, and O<sub>2</sub> concentrations and exhaust gas flow in the Emission Unit B1 (Boiler) stack whenever the boiler is operating. [District Rule 2.11; 40 CFR 60.7; 40 CFR 60.8 and 40 CFR 60.13]
- a. The permittee shall maintain continuous emission monitoring records for the monitoring system in a form suitable for inspection and approved by the District. Such records shall include, but are not limited to:
- The continuous emission monitoring measurements for CO, NO<sub>x</sub> and O<sub>2</sub> expressed in average hourly ppm (CO, NO<sub>x</sub> and O<sub>2</sub> only), pounds per hour and pounds per day emissions (CO and NO<sub>x</sub> only), and flow expressed in average hourly thousand standard cubic feet per minute;
  - The date, time, and duration of any start-up, shutdown or malfunction in the operation of any of the boiler or the emission monitoring equipment;
  - The results of performance testing, evaluation, calibration, checks, adjustments, and maintenance of the continuous emission monitoring system;
  - The CEMs shall be operated and maintained in accordance with the most recent Continuous Emissions Monitoring System Quality Assurance, Quality Control (CEMS QA/QC) Plan satisfying the requirements of 40 CFR Part 60, Appendices B and F and approved by the District for monitoring of CO, NO<sub>x</sub>, O<sub>2</sub> and flow.
23. **Monitoring and Recordkeeping Requirements – Change:** The permittee shall provide written notification to EPA Region 9 and the District of any proposed physical or operations change to Emission Unit B1 (Boiler) which may increase the emission rate of any air pollutant to which an emission limit standard applies under 40 CFR 60, Subpart Db, unless the change is specifically exempted under 40 CFR 60.14(e). This notice shall be postmarked at least 60 days before the change is commenced and shall include information describing the precise nature of the changes, present and proposed emission control systems, steam and heat input capacity of the facility before and after the change, and the expected completion date of the change. The District and/or EPA Region 9 may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]
24. **Monitoring and Recordkeeping Requirements – Steam Capacity:** The steam produced by Emission Unit B1 (Boiler) shall be monitored and recorded on a continual basis. These records shall be made available to the District upon request. The permittee shall maintain these records for not less than five years from the time they were produced. [District Rule 2.13]
25. **Monitoring and Recordkeeping Requirements – Ammonia:** Using the Emissions Monitoring Plan developed under ATC 040208-B, whenever parametric data indicate that ammonia emissions could exceed 25 ppmd on an uncorrected basis, the permittee shall, as soon as possible, but no later than within 24 hours, either take corrective action or measure actual emissions using the reference method.  
[District Rule 2.11]
26. **Monitoring and Recordkeeping Requirements – Emissions Calculations:** The permittee shall calculate and maintain a record of the annual NO<sub>x</sub> and CO emissions from Emission Unit B1 (Boiler) (in units of tons per calendar year) through calendar year 2020 using the best available data. The permittee shall submit a report to EPA Region 9 within 60 days after any year through 2020 where the annual NO<sub>x</sub> emissions from Emission Unit B1 (Boiler) equal or exceed 117.1 tons per year or the annual CO emissions from Emission Unit B1 (Boiler) equal or exceed 404 tons per year. That report shall contain all of the information specified in 40 CFR 52.21(r)(6)(v). [40 CFR 52.21(r)(6)]
27. **Monitoring and Recordkeeping Requirements – SNCR:** The permittee shall operate, inspect, and maintain the Emission Unit B1 (Boiler) SNCR unit in accordance with the manufacturer's specifications.  
[District Rule 2.7]

28. **Monitoring and Recordkeeping Requirements - ESP:** The permittee shall operate, inspect, and maintain the Emission Unit B1 (Boiler) Electrostatic Precipitator (ESP) in accordance with the manufacturer's specifications. *[District Rule 2.7]*
29. **Recordkeeping Requirement - General:** The Permittee shall maintain the following records on site:  
*[District Rule 2.13 (VI)(B)(6)]*
- a. Maintain records of all testing, monitoring and support information associated with any applicable federal and local requirements identified in this permit, including:
    - i. Date, place, and time of sampling or monitoring;
    - ii. Operating condition at the time of sampling;
    - iii. Date, place and method of analysis; and
    - iv. Results of analysis.
  - b. The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report or application.
  - c. Any other record keeping deemed necessary by the APCO to ensure compliance with all applicable federal requirements.
30. **Recordkeeping Requirements – CEMS:** The CEMs records shall be maintained at the facility for five years and shall be available to the APCO or the EPA Administrator upon request.  
*[District Rule 2.13(VI)(B)(6)]*
31. **Reporting Requirement – Performance Test:** The Permittee shall report facility operating conditions, including the status of process and control systems, which occurred during the performance tests. The Permittee shall record and include in the final report the following operational parameters taken during compliance testing: *[District Rule 2.13(VI)(B)(5)]*
- a. Device B-1 (Boiler):
    - i. Boiler steam rate (pounds/hour),
    - ii. Wood fuel moisture content (%),
    - iii. Percent overfire air (%),
    - iv. Fuel input (MMBtu/hour), and
  - b. Electrostatic Precipitator (ESP):
    - i. Primary and secondary amperage of the Transformer Rectifier (TR) set
    - iii. Primary and secondary voltage of the Transformer Rectifier (TR) set
    - iv. Spark rate in each ESP field
32. **Reporting Requirement – Monitoring Report:** Every six months, the permittee shall submit to the District a Monitoring Report and shall identify any deviation from the permit monitoring requirements applicable to emission unit B1, including any previously identified to the District under Condition 33.  
Each Monitoring Report shall be accompanied by a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the report. *[District Rule 2.13 (VI)(B)(7)(b)&(e)]*
33. **Reporting Requirement – Excess Emissions or Summary Report for CMS and Opacity:** The permittee is required to submit to the District and EPA Region 9 an Excess Emission and Monitoring Systems Performance Reports and/or Summary Reports for Emission Unit B1 (Boiler) opacity. Each report shall comply with the requirements of 40 CFR 60.7(c) or (d), as applicable, as summarized below. *[40 CFR 60.7(c)&(d)]*
- a. If the total duration of excess emissions for the reporting period is less than 1 % of the total operating time for the reporting period and CMS downtime for the reporting period is less than 5 % of the total operating

Roseburg Forest Products  
Title V Permit Number TVOP 030912  
Expiration Date: 5 years from date of issuance

- time for the reporting period, only the Summary Report form shall be submitted, and the Excess Emissions Report need not be submitted, unless requested by the EPA Region 9 or the District.
- b. If the total duration of excess emissions for the reporting period is 1 % or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 % or greater of the total operating time for the reporting period, the Summary Report form and the Excess Emissions Report shall both be submitted.
  - c. The Summary Report form for the boiler opacity shall contain the information and be in the format as shown below:

**Table 5 - Summary Report – Gaseous & Opacity Excess Emission & Monitoring System Performance**

Pollutant: Reporting period dates: Company: Emissions Limitation: Address: Monitor Manufacturer and Model Number: Date of Latest CMS Certification or Audit: Process Unit(s) Description: Total Source Operating Time in Reporting Period <sup>1</sup> :			
Emission Data Summary <sup>1</sup>		CMS Performance Summary <sup>1</sup>	
1. Duration of excess emissions in reporting period due to:		1. CMS downtime in reporting period due to:	
a. Startup/shutdown		a. Monitoring equipment malfunctions	
b. Control equipment problems		b. Non-Monitor equipment malfunctions	
c. Process problems		c. Quality assurance calibration	
d. Other known cause		d. Other known causes	
e. Unknown cause		e. Unknown causes	
2. Total duration of excess emissions		2. Total CMS downtime	
3. Total duration of excess emissions x (100) [Total source operating time] <sup>2</sup>	%	3. [Total CMS downtime] X (100) [Total source operating time] <sup>2</sup>	%
<sup>1</sup> For opacity, record all time in minutes. For gases, record all time in hours.			
<sup>2</sup> For the reporting period: If the total duration of excess emissions is 1% or greater of the total operating time or the total CMS downtime is 5 % or greater of the total operating time, both the Summary Report form and the Excess Emission Report are required to be submitted.			

d. The Excess Emissions and Monitoring Systems Performance Report form for the Emission Unit B1 (Boiler) opacity shall contain the information, as described below:

- i. The magnitude of excess emissions computed in accordance to 40 CFR 60.13(h), any conversion factor(s) used, the date and time of commencement and completion of each time period of excess emissions, and the total process operating time during the reporting period.
- ii. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the affected facility, the nature and cause of any malfunction (if known), and the corrective action taken and/or preventative measures adopted.
- iii. The date and time identifying each period during which the continuous monitoring system was inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.
- iv. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

e. The reporting period for the Excess Emissions and Monitoring Systems Performance Report and/or the Summary Report is each six-month period. All reports shall be included as part of the semi-annual monitoring report. [40 CFR 60.49b(w); 40 CFR 60.7(c); 40 CFR 60.7(g)]

34. **Reporting Requirement – Deviations:** Any deviation from requirements, including those attributable to breakdown conditions, as described in Conditions 85-93, shall be promptly reported to the APCO who will determine what constitutes “prompt” reporting in terms of the requirement, the degree, and type of deviation

Roseburg Forest Products  
Title V Permit Number TVOP 030912  
Expiration Date: 5 years from date of issuance

likely to occur. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken.  
*[District Rule 2.13(VI)(B)(7)(a)&(c)]*

### Emission Units D3, and D4 (Veneer Dryers) Requirements

Table 6 – Emission Units D3-D4 (Veneer Dryer) Requirements

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition	Monitoring/ Frequency	Reporting	Federally Enforceable?
District Rule 4.1, Visible Emissions	35	Opacity Limitations	40% opacity or Ringelmann 2 for more than three (3) minutes in any one (1) hour	N/A	N/A	N/A	Annual	Y
District Rule 4.5, Particulate Matter	36	PM	0.30 gr / scf of exhaust gas	N/A	43	N/A	Annual	Y
District Rule 4.6	37	Pollution Control Equipment	Operate per manufacturer's specs	N/A	N/A	N/A	Annual	Y
40 CFR 63.2250(b)	38	Operate	According to 40 CFR 63.6(e)(3)	N/A	N/A	N/A	Semi-annual	Y
40 CFR 63.2240, Table 1B	39	HAP Control Option	Choose one of six options	N/A	44	once every 12 months	Semi-annual	Y
					49	N/A		
40 CFR 63.2240, Table 2	40	Temperature	Above minimum temperature, 3-hour block average	N/A	46 47	Continuously	Semi-annual	Y
40 CFR 63.2241a, Table 3	41	Fugitives	Minimize	N/A	45	Follow written plan	Semi-annual	Y
	42	Redry inlet Moisture	≤ 25% (by weight, dry basis), 24-hour block average	N/A	46 48	Continuously	Semi-annual	Y

35. **Applicable Requirement - Opacity:** Except as provided in the District regulations, the permittee shall not cause or allow to be discharged into the atmosphere from Emission Units D3-D4 (Veneer Dryers) any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:  
*[District Rule 4.1]*

- a. as dark or darker in shade as that designated as No. 2 on the Ringelmann chart, as published by the United States Bureau of Mines;
- b. of such opacity as to obscure an observer's view to a degree equal to, or greater than, smoke described in Condition 35(a) above.

36. **Applicable Requirement - Particulate Matter:** The permittee shall not cause or allow to be discharged from Emission Units D3-D4 (Veneer Dryers), particulate matter in excess of 0.30 grains per cubic foot of exhaust

gas at standard conditions, or in any one hour, total quantities in excess of the amount listed in Table7, whichever is the more restrictive condition. To use Table7, first determine the veneer dryer process weight per hour, then find that process weight rate on the table, opposite of which is the maximum number of pounds of contaminants that may be discharged into the atmosphere in any one hour. Where the process weight per hour falls between figures in the left hand column, the exact weight of permitted discharge shall be interpolated.  
 [District Rule 4.5]

**Table 7 – Process Weights and Emission Rates for Dryers, Cyclones & Log Vats**

Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)
50	0.25	1900	4.03	4700	6.45
100	0.46	2000	4.14	4800	6.52
150	0.66	2100	4.24	4900	6.60
200	0.85	2200	4.34	5000	6.67
250	1.03	2300	4.44	5500	7.03
300	1.20	2400	4.55	6000	7.37
350	1.35	2500	4.64	6500	7.71
400	1.50	2600	4.74	7000	8.05
450	1.63	2700	4.84	7500	8.39
500	1.77	2800	4.92	8000	8.71
550	1.89	2900	5.02	8500	9.03
600	2.01	3000	5.10	9000	9.36
650	2.12	3100	5.18	9500	9.67
700	2.24	3200	5.27	10000	10.00
750	2.34	3300	5.37	11000	10.62
800	2.43	3400	5.44	12000	11.28
850	2.53	3500	5.52	13000	11.89
900	2.62	3600	5.61	14000	12.50
950	2.72	3700	5.69	15000	13.13
1000	2.80	3800	5.77	16000	13.74
1100	2.97	3900	5.85	17000	14.36
1200	3.12	4000	5.93	18000	14.97
1300	3.26	4100	6.01	19000	15.58
1400	3.40	4200	6.08	20000	16.19
1500	3.54	4300	6.15	30000	22.22
1600	3.66	4400	6.22	40000	28.30
1700	3.79	4500	6.30	50000	34.30
1800	3.91	4600	6.37	60000	40.00

37. **Applicable Requirement – Performance:** The permittee shall maintain and operate RCO1 in accordance with the manufacturers' specifications for optimum performance and efficiency. *[District Rule 2.7]*
38. **Applicable Requirement – Performance:** The permittee must always operate and maintain Emission Units D3-D4 (Veneer Dryers), including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(3) (Startup, Shutdown and Malfunction Plan). *[40 CFR 63.2250(b)]*
39. **Applicable Requirement – PCWP Compliance Option - Control:** The permittee shall ensure that the control systems on the heated zones in Emission Units D3-D4 (Veneer Dryers) comply with one of the following options during any time that green veneer is being dried in one or both dryers:  
*[40 CFR 63.2240, Table 1B]*
1. Reduce emissions of total HAP, measured as THC (as carbon), by 90 percent; or
  2. Limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd; or
  3. Reduce methanol emissions by 90 percent; or
  4. Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
  5. Reduce formaldehyde emissions by 90 percent; or
  6. Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.
40. **Applicable Requirement – PCWP Operating Requirement - Temperature:** The permittee shall maintain the 3-hour block average temperature in the RCO at or above 795.9 degrees F as established during the initial performance test on 12/04/2008, during any time that green veneer is being dried in a veneer dryer. The permittee can reset this temperature by performing a new performance test compliant with the requirements of 40 CFR 63.2262. *[40 CFR 63.2240, Table 2]*
41. **Applicable Requirement – PCWP Work Practice Requirement - Fugitive Emissions:** The permittee shall develop a written plan for minimizing fugitive emissions from the veneer dryer doors through proper maintenance procedures and at the green end of the dryers through proper balancing of the heated zone exhausts. *[40 CFR 63.2241(a), Table 3]*
42. **Applicable Requirement – PCWP Work Practice Requirement - Redry Moisture:** The permittee may operate Emission Units D3-D4 (Veneer Dryers) during time periods that the catalytic oxidizer temperature is not compliant with the requirements of condition 40 if the permittee demonstrates that the 24-hour block average inlet moisture content of veneer being dried in the veneer dryer is less than or equal to 25 percent (by weight, dry basis) during any such period. *[40 CFR 63.2241(a), Table 3]*
43. **Monitoring Requirement – Particulate Matter:** To determine compliance with particulate matter limits in Condition 36 of this permit, the Permittee shall maintain the catalytic oxidizer temperature above the minimum temperature established during the initial performance test or as subsequently reset as required by Condition 40 or demonstrate that the 24-hour block average inlet moisture content of veneer being dried in the veneer dryer is less than or equal to 25 percent (by weight, dry basis) during any such period. *[District Rule 2.10]*
44. **Monitoring and Recordkeeping Requirement – PCWP Operating Requirement - Catalyst:** The permittee shall check the activity level of a representative sample of the RCO1 catalyst at least once every 12 months. *[40 CFR 63.2240, Table 2]*
45. **Monitoring and Recordkeeping Requirement – PCWP Work Practice Requirement – Fugitive Emissions:** The permittee shall follow and document implementation of the plan required under Condition 41 for minimizing fugitive emissions. *[40 CFR 63.2271(a), Table 8]*
46. **Monitoring and Recordkeeping Requirement – PCWP General Monitoring:** The permittee shall ensure that each continuous parameter monitoring system (CPMS) required by 40 CFR 63 Subpart DDDD (PCWP

MACT) is installed, operated, and maintained according to this section:

- 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. [40 CFR 63.2269(a)(1)]
  - b. At all times, maintain the monitoring equipment including, but not limited to, maintaining the necessary parts for routine repairs of the monitoring equipment. [40 CFR 63.2269(a)(2)]
  - c. Record the results of each inspection, calibration, and validation check. [40 CFR 63.2269(a)(3)]
47. **Monitoring and Recordkeeping Requirement – PCWP Temperature Monitoring:** For each temperature monitoring device, the permittee must meet the requirements in Conditions 47.a through 47.f.  
[40 CFR 63.2269(b)]
- a. Locate the temperature sensor in a position that provides a representative temperature.  
[40 CFR 63.2269(b)(1)]
  - b. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger. [40 CFR 63.2269(b)(2)]
  - c. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.  
[40 CFR 63.2269(b)(3)]
  - d. Perform an electronic calibration at least once per semiannual compliance period according to the procedures in the manufacturer's Owner's Manual. Following the electronic 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 reading within 30°F of the process temperature sensor's reading. [40 CFR 63.2269(b)(4)]
  - e. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor. [40 CFR 63.2269(b)(5)]
  - f. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. [40 CFR 63.2269(b)(6)]
48. **Monitoring and Recordkeeping Requirement – PCWP Wood Moisture Monitoring:** If a furnish moisture meter is installed in order to demonstrate that the 24-hour block average inlet moisture content of veneer being dried in the veneer dryer is less than or equal to 25 percent (by weight, dry basis) pursuant to condition 42, the permittee shall meet the requirement in Conditions 48.a through 48.e below. These requirements do not apply so long as the permittee does not choose to demonstrate that veneer being introduced into the dryer has a moisture content of 25 percent or less. [40 CFR 63.2269(c)]
- a. Use a continuous moisture monitor on the veneer dryers, with a minimum accuracy of 3 percent (dry basis) moisture or better in the 15 to 25 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 veneer dryers used to redry veneer with less than 20 percent (dry basis) moisture.  
[40 CFR 63.2269(c)(1)]
  - b. Locate the moisture monitor in a position that provides a representative measure of veneer moisture.  
[40 CFR 63.2269(c)(2)]
  - c. 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). [40 CFR 63.2269(c)(3)]
  - d. At least quarterly inspect all components of the moisture monitor for integrity and all electrical connections for continuity. [40 CFR 63.2269(c)(4)]
  - e. Use the following equation to convert percent moisture measurements on a wet basis to a dry basis:  
[40 CFR 63.2269(c)(5)]  
$$MC_{dry} = [(MC_{wet}/100)/(1-(MC_{wet}/100))] \times 100$$

Where:  
MC<sub>dry</sub> = percent moisture content of wood material (wt%, dry basis);  
MC<sub>wet</sub> = percent moisture content of wood material (wt%, wet basis);
49. **Monitoring and Recordkeeping Requirement – PCWP Continuous Compliance:** The permittee shall demonstrate continuous compliance with the compliance options of Condition 39, the operating requirement of Condition 40, and the work practice standards of Conditions 41 and 42 by maintaining the following:

- a. Except for, as appropriate, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), all monitoring shall be conducted in continuous operation at all times that the process units are operating. [40 CFR 63.2270(b)]
  - b. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, startups, shutdowns, malfunction and during times covered by the routine control device maintenance exemption are not to be included in the averaging calculations. [40 CFR 63.2270(b & c)]
  - c. The 3-hour block average of all recorded readings shall be calculated after every 3-hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in Condition 49.b). [40 CFR 63.2270(d)]
  - d. For veneer redryer wood moisture monitoring, if the permittee chooses to demonstrate that veneer being introduced into the dryer has a moisture content of 25 percent or less, the 24-hour block average of all recorded readings shall be calculated after every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours (excluding periods described in Condition 49.b). This requirement does not apply if the permittee chooses to assume that all veneer being introduced into the dryer has a moisture content of greater than 25 percent. [40 CFR 63.2270(e)]
  - e. To calculate the data averages for each 3-hour or 24-hour averaging period, the permittee shall 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 Condition 49.b). [40 CFR 63.2270(f)]
  - f. Report each instance in which the permittee did not meet each compliance option and operating requirement in 40 CFR Part 63 Subpart DDDD Tables 7 and 8 that apply. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in Conditions 49.f.i through 49.f.iii. These instances are deviations from the compliance options, operating requirements, and work practice requirements in the NESHAP. These deviations must be reported according to the requirements in 40 CFR 63.2281 provided in Condition 53. [40 CFR 63.2271(b)]
    - i. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the startup, shutdown and malfunction (SSM) Plan. [40 CFR 63.2271(b)(1)]
    - ii. Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to SCAPCD's satisfaction that the permittee was operating in accordance with the SSM Plan. SCAPCD will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e). [40 CFR 63.2271(b)(2)]
    - iii. Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the permittee demonstrates to SCAPCD's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. The routine control device maintenance exemption must not exceed 0.5 percent of annual operating uptime for each process unit controlled. [40 CFR 63.2271(b)(3) and 40 CFR 63.2251(b)(2)]
50. **Recordkeeping Requirement:** The Permittee shall maintain the following records on site: [District Rule 2.13 (VI)(B)(6)]
- a. Maintain records of all testing, monitoring and support information associated with any applicable federal and local requirements identified in this permit, including:
    - i. Date, place, and time of sampling or monitoring;
    - ii. Operating condition at the time of sampling;
    - iii. Date, place and method of analysis; and
    - iv. Results of analysis.
  - b. The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report or application.

- c. Any other record keeping deemed necessary by the APCO to ensure compliance with all applicable federal requirements.
  
- 51. **Reporting Requirement – Monitoring Report:** Every six months, the permittee shall submit to the District a Monitoring Report and shall identify any deviation from the permit monitoring requirements applicable to emission units D3 and D4, including any previously identified to the District under Condition 54.  
  
Each Monitoring Report shall be accompanied by a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the report. *[District Rule 2.13(VI)(B)(7)(b)&(e)]*
  
- 52. **Reporting Requirement - PCWP NESHAP Notifications:** The permittee must notify the District within 30 days prior to taking any of the actions specified below: *[40 CFR 63.2280(g)]*
  - a. Modification or replacement of the control system for emission units D3 or D4; or
  - b. A change to a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for emission units D3 or D4 or their respective control devices.
  
- 53. **Reporting Requirement - PCWP NESHAP Continuous Compliance Demonstration:** The permittee shall certify compliance with the requirements of Conditions 39, 40, 41, 42, and 44 as part of each semi-annual compliance certification. *[40 CFR 63.2271 and 40 CFR 63.2281]*
  - a. This report must include identification of each instance in which the permittee did not meet each compliance option and/or operating requirement in Table 7 of Subpart DDDD that applies to the facility. This includes periods of startup, shutdown and malfunctions and periods of control device maintenance. *[40 CFR 63.2271(b)]*
  - b. The permittee shall report to SCAPCD by fax or by telephone within two (2) working days if actions taken during a period of startup, shutdown or malfunction are inconsistent with the SSM Plan. *[40 CFR 63.10(d)(5)(ii)]*
  - c. The permittee shall submit a written follow-up report with SCAPCD within seven (7) days after the end of any SSM event where actions were taken inconsistent with the SSM Plan unless SCAPCD has authorized alternative arrangements. *[40 CFR 63.10(d)(5)(ii)]*
  
- 54. **Reporting Requirement – Deviations:** Any deviation from requirements, including those attributable to breakdown conditions, as described in Conditions 85-93, shall be promptly reported to the APCO who will determine what constitutes “prompt” reporting in terms of the requirement, the degree, and type of deviation likely to occur. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken. *[District Rule 2.13(VI)(B)(7)(a)&(c)]*

### Emission Units C1, C2, C3, C4, and C5 (Cyclone) Requirements

Table 8 – Emission Units C1-C5 (Cyclone) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Testing Condition	Monitoring Condition	Monitoring/Frequency	Reporting	Federally Enforceable?
District Rule 4.1, Visible Emissions	55	Opacity Limitations	40% opacity or Ringelmann 2 for more than three (3) minutes in any one (1) hour	N/A	57	Visual Survey weekly	Semi-annual	Y
District Rule 4.5, Particulate Matter	56	PM	0.30 gr / scf of exhaust gas	N/A	N/A	N/A	Annual	Y

55. **Applicable Requirement - Opacity:** Except as provided in the District regulations, the permittee shall not cause or allow to be discharged into the atmosphere from Emission Units C1-C5 (Cyclones), any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:  
*[District Rule 4.1]*

- a. as dark or darker in shade as that designated as No. 2 on the Ringelmann chart, as published by the United States Bureau of Mines;
- b. of such opacity as to obscure an observer's view to a degree equal to, or greater than, smoke described in Condition 55.a, above.

56. **Applicable Requirement - Particulate Matter:** The permittee shall not cause or allow to be discharged from Emission Units C1-C5 (Cyclones), particulate matter in excess of 0.30 grains per cubic foot of exhaust gas at standard conditions, or in any one hour, total quantities in excess of the amount listed in Table 9, whichever is the more restrictive condition. To use Table 9, first determine the cyclone process weight per hour, then find that figure on the table, opposite of which is the maximum number of pounds of contaminants that may be discharged into the atmosphere in any one hour. Where the process weight per hour falls between figures in the left hand column, the exact weight of permitted discharge shall be interpolated. *[District Rule 4.5]*

Table 9 – Process Weights and Emission Rates for Dryers, Cyclones & Log Vats

Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)
50	0.25	1900	4.03	4700	6.45
100	0.46	2000	4.14	4800	6.52
150	0.66	2100	4.24	4900	6.60
200	0.85	2200	4.34	5000	6.67
250	1.03	2300	4.44	5500	7.03
300	1.20	2400	4.55	6000	7.37
350	1.35	2500	4.64	6500	7.71
400	1.50	2600	4.74	7000	8.05
450	1.63	2700	4.84	7500	8.39

Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)
500	1.77	2800	4.92	8000	8.71
550	1.89	2900	5.02	8500	9.03
600	2.01	3000	5.10	9000	9.36
650	2.12	3100	5.18	9500	9.67
700	2.24	3200	5.27	10000	10.00
750	2.34	3300	5.37	11000	10.62
800	2.43	3400	5.44	12000	11.28
850	2.53	3500	5.52	13000	11.89
900	2.62	3600	5.61	14000	12.50
950	2.72	3700	5.69	15000	13.13
1000	2.80	3800	5.77	16000	13.74
1100	2.97	3900	5.85	17000	14.36
1200	3.12	4000	5.93	18000	14.97
1300	3.26	4100	6.01	19000	15.58
1400	3.40	4200	6.08	20000	16.19
1500	3.54	4300	6.15	30000	22.22
1600	3.66	4400	6.22	40000	28.30
1700	3.79	4500	6.30	50000	34.30
1800	3.91	4600	6.37	60000	40.00

57. **Monitoring and Recordkeeping Requirement - Visual Emission Evaluation:** The Permittee shall monitor the opacity from Emission Units C1-C5 (Cyclones) using the following method:  
*[District Rule 2.10, District Rule 2.11]*
- a. Within 60 days after the issuance of this permit, the certified VEE representative for Roseburg Forest Products shall conduct a certified Method 9 observation on each cyclone. This observation shall take place when the equipment is operating under normal conditions.
  - b. The certified Method 9 observer shall conduct a weekly visual survey of emissions coming from each cyclone. During this weekly survey, the observer will make the following determination:
    - i. If during the weekly observation, the VEE representative does NOT see a visible plume<sup>1</sup> coming from the point source that, on an instantaneous basis, appears to exceed the opacity limit, then the observer shall keep a record of his/her name, date, time, and location for the observation. (<sup>1</sup> See List of Definitions)
    - ii. If the observer sees a visible plume from the point source that does, on an instantaneous basis, appear to exceed the opacity limit, then the observer shall take a 6-minute Method 9 observation of the visible plume. The observer shall record his/her name, date, time, location, and a certified Method 9 reading.
    - iii. The Permittee shall conduct at least one Method 9 opacity test annually for each emission unit subject to the requirements of this section, if the emission unit operated for more than 100 hours during the calendar year.

58. **Recordkeeping Requirement:** The Permittee shall maintain the following records on site:  
*[District Rule 2.13 (VI)(B)(6)]*

- a. Maintain records of all testing, monitoring and support information associated with any applicable federal and local requirements identified in this permit, including:
    - i. Date, place, and time of sampling or monitoring;
    - ii. Operating condition at the time of sampling;
    - iii. Date, place and method of analysis; and
    - iv. Results of analysis.
  - b. The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report or application.
  - c. Any other record keeping deemed necessary by the APCO to ensure compliance with all applicable federal requirements.
59. **Reporting Requirement – Monitoring Report:** Every six months, the permittee shall submit to the District a Monitoring Report and shall identify any deviation from the permit monitoring requirements applicable to emission units C1 – C5, including any previously identified to the District under Condition 60.
- Each Monitoring Report shall be accompanied by a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the report. *[District Rule 2.13(VI)(B)(7)(b)&(e)]*
60. **Reporting Requirement – Deviations:** Any deviation from requirements, including those attributable to breakdown conditions, as described in Conditions 85-93, shall be promptly reported to the APCO who will determine what constitutes “prompt” reporting in terms of the requirement, the degree, and type of deviation likely to occur. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken.  
*[District Rule 2.13 (VI)(B)(7)(a)&(c)]*

### Emission Unit SV1 (Log Vats) Requirements

Table 10 – Emission Unit SV1 (Log Vats) Requirements

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition	Monitoring / Frequency	Reporting	Federally Enforceable ?
District Rule 4.1, Visible Emissions	61	Opacity Limitations	40% opacity or Ringelmann 2 for more than three (3) minutes in any one (1) hour	N/A	63	Visual Survey monthly	Semi-annual	Y
District Rule 4.5, Particulate Matter	62	PM	0.30 gr / scf of exhaust gas	N/A	N/A	N/A	Annual	Y

61. **Applicable Requirement -Opacity:** Except as provided in the District regulations, the permittee shall not cause or allow a discharge into the atmosphere from Emission Unit SV1 (Log Vats), any air contaminant for a period or periods aggregating more than three minutes in any one hour which is: *[District Rule 4.1]*

- a. as dark or darker in shade as that designated as No. 2 on the Ringelmann chart, as published by the United States Bureau of Mines;
- b. of such opacity as to obscure an observer's view to a degree equal to, or greater than, smoke described in Condition 61.a, above.

62. **Applicable Requirement - Particulate Matter:** The permittee shall not cause or allow a discharge from Emission Unit SV1 (Log Vats), of particulate matter in excess of 0.30 grains per cubic foot of exhaust gas at standard conditions, or in any one hour total quantities in excess of the amount listed in Table 11, whichever is the more restrictive condition. To use Table 11, first determine the steam vat process weight per hour, then find that figure on the table, opposite of which is the maximum number of pounds of contaminants that may be discharged into the atmosphere in any one hour. Where the process weight per hour falls between figures in the left hand column, the exact weight of permitted discharge shall be interpolated. *[District Rule 4.5]*

Table 11 – Process Weights and Emission Rates for Dryers, Cyclones & Log Vats

Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)
50	0.25	1900	4.03	4700	6.45
100	0.46	2000	4.14	4800	6.52
150	0.66	2100	4.24	4900	6.60
200	0.85	2200	4.34	5000	6.67
250	1.03	2300	4.44	5500	7.03
300	1.20	2400	4.55	6000	7.37
350	1.35	2500	4.64	6500	7.71
400	1.50	2600	4.74	7000	8.05
450	1.63	2700	4.84	7500	8.39

Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)	Process Weight (Lb/Hr)	Emission Rate (Lb/Hr)
500	1.77	2800	4.92	8000	8.71
550	1.89	2900	5.02	8500	9.03
600	2.01	3000	5.10	9000	9.36
650	2.12	3100	5.18	9500	9.67
700	2.24	3200	5.27	10000	10.00
750	2.34	3300	5.37	11000	10.62
800	2.43	3400	5.44	12000	11.28
850	2.53	3500	5.52	13000	11.89
900	2.62	3600	5.61	14000	12.50
950	2.72	3700	5.69	15000	13.13
1000	2.80	3800	5.77	16000	13.74
1100	2.97	3900	5.85	17000	14.36
1200	3.12	4000	5.93	18000	14.97
1300	3.26	4100	6.01	19000	15.58
1400	3.40	4200	6.08	20000	16.19
1500	3.54	4300	6.15	30000	22.22
1600	3.66	4400	6.22	40000	28.30
1700	3.79	4500	6.30	50000	34.30
1800	3.91	4600	6.37	60000	40.00

63. **Monitoring and Recordkeeping Requirement - Visual Emission Evaluation:** The Permittee shall monitor the opacity from the steam vat using the following method: *[District Rule 2.10]*
- a. Within 60 days after the issuance of this permit, the certified VEE representative for Roseburg Forest Products shall conduct a certified Method 9 observation on the log vats. This observation shall take place when the equipment is operating under normal conditions.
  - b. The certified Method 9 observer shall conduct a monthly visual survey of emissions coming from the log vats. During this monthly survey, the observer will make the following determination:
    - i. If during the monthly observation the VEE representative does **NOT** see a visible plume<sup>1</sup> coming from the point source that, on an instantaneous basis, appears to exceed the opacity limit, then the observer shall keep a record of his/her name, date, time, and location for the observation; (<sup>1</sup> See List of Definitions)
    - ii. If the observer sees a visible plume from the point source that does, on an instantaneous basis, appear to exceed the opacity limit, then the observer shall take a 6-minute Method 9 observation of the plume. The observer shall record his/her name, date, time, location, and a certified Method 9 reading;
    - iii. The permittee shall conduct at least one Method 9 opacity test annually for each stack subject to the requirements of this section, if the unit operated more than 100 hours during the calendar year.
64. **Recordkeeping Requirement:** The Permittee shall maintain the following records on site: *[District Rule 2.13 (VI)(B)(6)]*
- a. Maintain records of all testing, monitoring and support information associated with any applicable federal and local requirements identified in this permit, including:

- i. Date, place, and time of sampling or monitoring;
    - ii. Operating condition at the time of sampling;
    - iii. Date, place and method of analysis; and
    - iv. Results of analysis.
  - b. The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report or application;
  - c. Any other record keeping deemed necessary by the APCO to ensure compliance with all applicable federal requirements.
65. **Reporting Requirement – Monitoring Report:** Every six months, the permittee shall submit to the District a Monitoring Report and shall identify any deviation from the permit monitoring requirements applicable to emission unit SV1, including any previously identified to the District under Condition 66.
- Each Monitoring Report shall be accompanied by a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the report. *[District Rule 2.13 (VI)(B)(7)(b)&(e)]*
66. **Reporting Requirement – Deviations:** Any deviation from requirements, including those attributable to breakdown conditions, as described in Conditions 85-93, shall be promptly reported to the APCO who will determine what constitutes “prompt” reporting in terms of the requirement, the degree, and type of deviation likely to occur. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken.  
*[District Rule 2.13(VI)(B)(7)(a)&(c)]*

**Emission Unit F1 (Material Handling Fugitives) Requirements**

**Table 12 – Emission Unit F1 (Material Handling Fugitives) Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition	Monitoring/ Frequency	Federally Enforceable ?
District Rule 4.1	67	Fugitive Emissions	40% opacity or Ringelmann 2 for any 3-minute period in one hour	NA	68	Visual Survey weekly	Y

67. **Applicable Requirement – Fugitive Emissions:** With respect to Fugitive Emissions, the permittee shall not cause or allow a discharge into the atmosphere from Emission Unit F1 (Material Handling Fugitives), any contaminant for a period or periods aggregating more than three minutes in any one hour which is:  
 [District Rule 4.1]
- a. as dark or darker in shade as that designated as No.2 in the Ringelmann chart, as published by the United States Bureau of Mines;
  - b. of such opacity as to obscure an observer’s view to a degree equal to, or greater than, smoke as described in Condition 67.a, above. The following is a list of some, but not all, sources for fugitive emissions at this facility:
    - i. Dust on roadways;
    - ii. Blowing sawdust;
    - iii. Handling of Fly Ash; and
    - iv. Leaking exhaust lines.
68. **Monitoring and Recordkeeping Requirement - Visual Emission Evaluation:** The Permittee shall monitor fugitive emissions from: [District Rule 2.7]
- a. plant site by performing weekly visual inspections to determine whether visible fugitive emissions are crossing the property line that derive from the permittee’s operations. If the observer sees visible fugitive emissions from permittee’s facility that do, on an instantaneous basis, appear to exceed the opacity limit as they leave the permittee’s property, then the observer shall either take a 6-minute Method 9 observation of the fugitive emissions to document that they are compliant or implement mitigation measures to ensure fugitive emissions do not cross property lines. The observer shall record his/her name, date, time, location, and whether, if instantaneous emissions above the limit were detected, whether a certified Method 9 reading was taken or whether mitigation measures were taken. If mitigation measures were taken, they shall be recorded;
  - b. monitoring of air conveyance piping (conduit) systems shall be accomplished once each 6 months and any leaks of conveyed material shall be immediately repaired and documented.

### Emission Unit G1 (Stationary Internal Combustion Engines/Generators) Requirements

Table 13 – Emission Unit G1 (Stationary Internal Combustion Engines/Generators) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Testing Condition	Monitoring Condition	Monitoring / Frequency	Reporting	Federally Enforceable?
District Rule 4.1 (A)(B)	69	Opacity Limitations	40% opacity or Ringelmann 2 for more than three (3) minutes in any one (1) hour	N/A	76	Visual Survey weekly	Semi-annual	Y
District Rule 4.4 (B)(2)	70	PM	0.20 gr / scf of exhaust gas	74	N/A	N/A	Annual	Y
District Rule 4.4 (D)	71	NO <sub>x</sub>	140 lbs / hr, assuming 100% as NO <sub>2</sub>	74	N/A	N/A	Annual	Y
CCR Title 13, Div. 3, Chpt. 5, Art. 2, Sec. 2281 & 2282	72	Diesel Fuel Sulfur Content	15 ppm by weight	N/A	N/A	N/A	Annual	Y
40 CFR Part 63 Subpart ZZZZ	73	HAPs	Operation and Maintenance Requirements	N/A	77	As Needed	As Needed	Y

69. **Applicable Requirement - Opacity:** The permittee shall not discharge into the atmosphere from any single source within Emission Unit G1 (Stationary Internal Combustion Engines/Generators) any emissions that exceed No. 2 on the Ringelmann Chart or 40 % opacity for a period or periods aggregating more than three minutes in any one hour. *[District Rule 4.1]*
70. **Applicable Requirement - Particulate Matter:** The permittee shall not discharge into the atmosphere from any single source within Emission Unit G1 (Stationary Internal Combustion Engines/Generators) particulate matter that exceeds 0.20 gr / scf calculated to 12% CO<sub>2</sub> at standard conditions. *[District Rule 4.4 (B)(2)]*
71. **Applicable Requirement - Nitrogen Oxide:** The permittee shall not discharge into the atmosphere from any single source within Emission Unit G1 (Stationary Internal Combustion Engines/Generators) oxides of nitrogen in excess of 140 pounds per hour assuming 100% emission as nitrogen dioxide (NO<sub>2</sub>). *[District Rule 4.4 (D)]*
72. **Applicable Requirement - Sulfur Content:** The permittee shall not use diesel fuel to power any single source within Emission Unit G1 (Stationary Internal Combustion Engines/Generators) that has a sulfur content of greater than 15 ppm by weight. *[Title 13 CCR sections 2281, 2282 and 2284]*
73. **Applicable Requirement –HAPs:** The permittee shall operate and maintain stationary internal combustion engines (Emission Unit G1) in compliance with the applicable sections of the Stationary Reciprocating Internal Combustion Engine NESHAP. *[40 CFR 63.6580]*
74. **Applicable Requirement –ATCM:** 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]*
75. **Testing Requirement:** The permittee shall demonstrate compliance with the emissions limits in Conditions 70 and 71 by maintaining records of all fuel consumption in Emission Unit G1 (Stationary Internal

Combustion Engines/Generators). [District Rule 2. 7]

76. **Monitoring and Recordkeeping Requirement- Visual Emission Evaluation:** The Permittee shall monitor the opacity from Emission Unit G1 (Stationary Internal Combustion Engines/Generators) using the following method: [District Rule 2.10 and 2.11]
- a. Within 60 days after the issuance of this permit the certified VEE representative for Roseburg shall conduct a certified Method 9 observation on Emission Unit G1 (Stationary Internal Combustion Engines/Generators). This observation shall take place when the equipment is operating under normal conditions. If an individual engine within Emission Unit G1 has not operated for more than 12 hours in any seven day period within 60 days after the issuance of this permit, the Permittee shall conduct the initial certified Method 9 observation for that engine during the first week when the engine operates more than 12 hours in a seven day period;
  - b. After the initial Method 9 observation, as stated above, the certified Method 9 observer shall conduct a weekly visual survey of emissions coming from Emission Unit G1 (Stationary Internal Combustion Engines/Generators). During this weekly survey the observer will make the following determination:
    - i. If, during the weekly observation, the VEE representative does NOT see a visible plume<sup>1</sup> coming from the point source that, on an instantaneous basis, appears to exceed the opacity limit, then the observer shall keep a record of his/her name, date, time, and location for the observation; (<sup>1</sup> See List of Definitions)
    - ii. If the observer sees a visible plume from the point source that does, on an instantaneous basis, appear to exceed the opacity limit, then the observer shall take a 6-minute Method 9 observation of the plume. The observer shall record his/her name, date, time, location, and a certified Method 9 reading;
    - iii. The Permittee shall conduct at least one Method 9 opacity test annually for each stack subject to the requirements of this section, if the unit operated during the calendar year.
  - c. Weekly opacity observations for any engine within Emission Unit G1 (Stationary Internal Combustion Engines/Generators) shall only be required during seven-day periods (weekly) when an engine has operated 12 or more hours.
77. **Monitoring and Recordkeeping Requirement – Operation/Maintenance:** The Permittee shall maintain records concerning the operation and maintenance of Emission Unit G1 (Stationary Internal Combustion Engines/Generators) as described in the applicable sections of the Stationary Reciprocating Internal Combustion Engine NESHAP. [40 CFR 63.6580]
78. **Recordkeeping Requirement:** The Permittee shall maintain the following records on site: [District Rule 2.13 (VI)(B)(6)]
- a. Maintain records of all testing, monitoring and support information associated with any applicable federal and local requirements identified in this permit, including:
    - i. Date, place, and time of sampling or monitoring;
    - ii. Operating condition at the time of sampling;
    - iii. Date, place and method of analysis; and
    - iv. Results of analysis.
  - b. The Permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report or application;
  - c. Any other record keeping deemed necessary by the APCO to ensure compliance with all applicable federal requirements.

79. **Reporting Requirement – Monitoring Report:** Every six months, the permittee shall submit to the District a Monitoring Report and shall identify any deviation from the permit monitoring requirements applicable to emission unit G1, including any previously identified to the District under Condition 80.

Each Monitoring Report shall be accompanied by a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the report. *[District Rule 2.13(VI)(B)(7)(b)&(e)]*

80. **Reporting Requirement – Deviations:** Any deviation from requirements, including those attributable to breakdown conditions, as described in Conditions 85-93, shall be promptly reported to the APCO who will determine what constitutes “prompt” reporting in terms of the requirement, the degree, and type of deviation likely to occur. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken.  
*[District Rule 2.13(VI)(B)(7)(a)&(c)]*

## REPORTING REQUIREMENTS

81. The permittee (responsible official) shall submit by March 15 of each year to the District and EPA Region 9 a compliance certification that addresses the previous calendar year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The compliance certification shall state that all submitted information is true, accurate, and complete.  
[District Rule 2.13 VI(B)(14)(c)]
82. A progress report (if needed) shall be made on a compliance schedule at least semiannually and shall include: [District Rule 2.13 (VI)(B)(7)(d)]
- a. The date when compliance will be achieved;
  - b. An explanation of why compliance was not or will not be achieved by the schedule date; and
  - c. A log of any preventative or corrective action taken.
83. Any application form or compliance certification submitted pursuant to the conditions in this permit shall contain certification of truth, accuracy, and completeness by the responsible official. This certification and any other certification required under this part shall state that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.  
[District Rule 2.13 VI)(B)(7)(e) and (IV)(C)(1)(m)]

## PERMIT DURATION

84. This permit shall be valid for a fixed term of five years from the date of issuance. For renewal of a permit, a responsible official shall submit a standard District application no earlier than 18 months, and no later than six months, before the expiration date of the current Permit to Operate. The Permit to Operate for all emissions units at a stationary source shall undergo simultaneous renewal. If the permittee submits a timely and complete application for renewal, this permit shall continue in full force and effect, notwithstanding expiration of this permit, until the District takes final action on the application.  
[40 CFR 70.6, (2); District Rule 2.13]

## BREAKDOWN CONDITIONS

85. For the purposes of this condition, a breakdown condition means an unforeseeable failure or malfunction of any air pollution control equipment or related operating equipment which causes a violation of any emission limitation or restriction prescribed by the applicable rules and regulations, or by state law, or similar failure of any required in-stack continuous monitoring equipment where such failure or malfunction: [District Rule 2.12]
- a. is not the result of neglect or disregard of any air pollution control law, or rule, or regulation;
  - b. is not intentional or the result of negligence;
  - c. is not the result of improper maintenance;
  - d. does not constitute a nuisance; and
  - e. is not a recurrent breakdown of the same equipment.
86. Any breakdown condition meeting the qualifications of this permit shall constitute a violation of applicable emission limitations or restrictions prescribed by these rules and regulations; however, the APCO may elect

to take no enforcement action if the owner or operator demonstrates to the APCO's satisfaction that a breakdown condition exists and the following requirements are met: *[District Rule 2.12 (B)(1)]*

- a. The breakdown is reported to the District Office as soon as reasonably possible, but no later than one (1) hour after its detection during a regular business day (8:00 am -5:00 pm), or one (1) hour after the start of the next regular business day, whichever is sooner. Report all applicable breakdowns to the District at (530) 841-4029 or (530) 841-4030.
  - b. The owner or operator takes immediate steps to minimize the impact of the breakdown and come into compliance.
  - c. The breakdown does not interfere with the attainment or maintenance of any national ambient air quality standard.
87. The breakdown shall be logged, investigated, and handled to its final disposition in accordance with uniform District procedures. *[District Rule 2.12 (B)(2)]*
88. Upon receipt of notification of a breakdown condition, the APCO shall promptly investigate and determine whether the occurrence constitutes a breakdown condition. If it is not a breakdown condition, the APCO may take appropriate enforcement action including, but not limited to, seeking fines, an abatement order, or an injunction against further operation. *[District Rule 2.12 (B)(3)]*
89. Within ten (10) days after a breakdown occurrence has been corrected, the permittee shall submit a written report to the APCO including, but not limited to, the following details: *[District Rule 2.12 (C)]*
- a. Duration of excessive emissions;
  - b. Estimate of quantity of emissions;
  - c. Statement of the cause of the occurrence, and
  - d. Corrective measures to be taken to prevent a recurrence. Documentation of the breakdown condition may be required by the Control Officer.
90. The burden of proof shall be on the permittee to provide sufficient information to demonstrate that a breakdown did occur. If the permittee fails to provide sufficient information, the APCO shall undertake appropriate enforcement action. *[District Rule 2.12(D)]*
91. Failure to comply with reporting requirements, or comply in a timely manner with reporting requirements established in conditions in this permit, shall constitute a separate violation of this permit. *[District Rule 2.12(E)]*
92. False claims of breakdown occurrence shall constitute a separate violation for any person to file a report with the APCO that falsely, or without probable cause, claims that an occurrence is a breakdown. *[District Rule 2.12 (F)]*
93. The permittee may, in lieu of shutdown, obtain an emergency variance for any extended breakdown provisions, for any occurrence which causes a breakdown condition meeting the requirements of this permit and which may persist for longer than twenty-four (24) hours (ninety-six [96] hours for monitoring equipment). *[District Rule 2.12(G)]*

#### EMERGENCY PROVISIONS

94. The permittee shall comply with District Rule 2.12 (Equipment Breakdown ), and the emergency provisions contained in all applicable federal requirements. *[District Rule 2.13(12)(a)]*

95. Within two weeks of an emergency event, the responsible official shall submit to the District a properly signed, contemporaneous log or other relevant evidence, which demonstrates that; *[District Rule 2.13(b)]*
- a. An emergency occurred;
  - b. The permittee can identify the cause(s) 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 working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken.
96. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. *[District Rule 2.13 VI (12)(c)]*

## PERMIT MODIFICATIONS

### Minor Permit Modifications

The following conditions apply to both minor and significant modifications made to the permit.

97. After obtaining any required pre-construction permits, the permittee shall submit a standard District application for each emission unit affected by the proposed permit revision that qualifies as a minor permit modification. The emissions unit(s) affected by the proposed permit modification shall not commence operation until the APCO approves the permit revision or until the requirement of Condition 98, below, is met. The application shall include the following: *[District Rule 2.13 IV(B)(4)(a)]*
- a. A description of the proposed permit revision and changes in emissions, and additional applicable federal requirements that will apply;
  - b. Proposed permit terms and conditions; and
  - c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used.
98. After filing the minor permit modification application, as required pursuant to Condition 97, and prior to final action by the District to issue or deny the requested minor permit modification or determine it is a significant modification, the source may immediately make the change(s), provided: *[District Rule 2.13IV (B)(4)(b)]*
- a. The modified emission unit(s) complies with the conditions of any applicable pre-construction or temporary permit to operate issued pursuant to District rules and regulations;
  - b. The modified emission unit(s) complies with all proposed permit terms and conditions identified in its minor permit modification application;
  - c. The change(s) is not prohibited by any permit conditions including those issued pursuant to Rule 2.13; and
  - d. The change(s) does not violate any applicable federal requirement or any rule or regulation of the District.

99. Allowing a stationary source to make a change prior to permit issuance does not constitute final action and does not preclude the District from denying the change or requiring the change to be processed as a significant permit modification, nor does it preclude the EPA from objecting to the permit modification. *[District Rule 2.13 IV(B)(4)(c)]*
100. After the stationary source makes the change(s) and before the minor permit modification is issued, the stationary source need not comply with the existing permit terms and conditions it seeks to modify. If the modified emission unit(s) fail to comply with the terms and conditions of the proposed minor permit modification, the existing permit terms and conditions the stationary source seeks to modify may be enforced against it. *[District Rule 2.13 IV(B)(4)(d)]*

### Significant Permit Modifications

101. After obtaining any required pre-construction permit, the permittee shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant permit modification. Upon request by the APCO, the permittee shall submit copies of the latest construction permit for each affected emissions unit. The emission unit(s) affected by the proposed permit modification shall not commence operation until the APCO takes final action to issue the revised permit or until the requirements in Condition 102 are met. *[District Rule 2.13 IV (B)(3)]*
102. An emission unit may commence operation of change(s) in a proposed significant permit modification prior to final action by the APCO to issue the permit modification, provided: *[District Rule 2.13 IV (B)(3)]*
- The stationary source has received and complies with, as required, a pre-construction permit under Section 112 (g) of the federal Clean Air Act (CAA), or under pre-construction review programs either approved into the State Implementation Plan (SIP), or authorized by the provisions of 40 CFR 52.21, pursuant to Parts C and D of Title I of the CAA;
  - The stationary source has received and complied with a temporary permit to operate issued pursuant to District Rule 2.1 F;
  - The stationary source submits an application for a significant permit modification within 12 months of commencing operation of the change(s);
  - The change(s) is not prohibited by any permit conditions including those issued pursuant to Rule 2.13; and
  - The modified emissions unit(s) complies with all applicable federal requirements and rules and regulations of the District.

### DISTRICT ACTION ON WRITTEN REQUESTS

The APCO shall act on a written request of a responsible official for permit action using the applicable procedure specified in this subsection. *[District Rule 2.13(V)(G)]*

103. **Administrative Permit Amendment:** The APCO shall take final action no later than 60 days after receiving the written request for an administrative permit amendment.
- After designating the permit revisions as an administrative permit amendment, the APCO may revise the permit without providing notice to the public or any affected state.
  - The APCO shall provide a copy of the revised permit to the responsible official and the U.S. EPA.

- c. While the APCO need not make a completeness determination on a written request, the APCO shall notify the responsible official if the APCO determines that the permit cannot be revised as an administrative permit amendment.
104. **Permit Modification for a Condition that is not Federally Enforceable:** The APCO shall take action on a written request for a permit modification for a condition that is not federally enforceable in accordance with the requirements of Rule 2.1 (Permits Required) and 6.2 (Standards for Permits to Operate) under the following circumstances:
- a. Any change at the stationary source allowed by the permit modification shall meet all applicable federal requirements and shall not violate any existing permit term or condition; and
  - b. The APCO provides to the U.S. EPA a contemporaneous written notice describing the change, including the date, any change in emissions or air pollutants emitted, and any applicable federal requirement that would apply as a result of the change.
105. **Permits to Operate for New Emissions Unit:** The APCO shall take action on a written request for a permit to operate for a new emissions unit in accordance with the requirements of Rule 2.1 (Permits Required) and 6.2 (Standards for Permits to Operate) under the circumstances specified in conditions 104.a and 104.b, above. However, the APCO shall require the submittal of a standard District application and take action on that application pursuant to the requirements of Rule 2.13 if any of the following apply:
- a. The construction or operation of the emissions unit is a modification under U.S. EPA regulations promulgated pursuant to Title I of the CAA, including 40 CFR Parts 51, 52, 60, 61, 63;
  - b. The construction or operation of the emissions unit is addressed or prohibited by permits for other emissions units at the stationary source; or
  - c. The emissions unit is an acid rain unit subject to Title IV of the CAA,

#### PERMIT REOPENING FOR CAUSE

106. The APCO shall reopen and revise a permit to operate during the annual review period required by section 42301(c) of the H&SC, or petition the District hearing board to do so pursuant to section 42307 of the H&SC, whichever is applicable, prior to its expiration date upon discovery of cause for reopening or upon notification of cause for reopening by the U.S. EPA, or within 18 months of promulgation of a new applicable federal requirement. The APCO shall act only on those parts of the permit for which cause to reopen exists. *[District Rule 2.13(V)(H)]*

#### OPERATIONAL FLEXIBILITY

107. The APCO shall allow specified changes in operations at a source without requiring a permit revision for conditions that address an applicable federal requirement. The APCO shall not allow changes which constitute a modification under Title I of the CAA or Rules 2.1 (Permits Required) and 6.1 (Standards for Permits to Construct), or that result in an exceedance of the emissions allowable under the permit, whether expressed therein as a rate of emissions or in terms of total emissions without revision to the permit. The source may gain operational flexibility through use of the following options: *[District Rule 2.13(V)(I)]*
108. **Alternative Operating Scenarios:** The APCO shall allow the use of alternative operating scenarios provided that: *[District Rule 2.13(V)(I)(1)]*
- a. Terms and conditions applicable to each operating scenario are identified by the responsible official in the permit application,

- b. The terms and conditions are approved by the APCO,
  - c. The terms and conditions are incorporated into the permit; and
  - d. The terms and conditions are in compliance with all applicable District, state, and federal requirements.
109. The permittee shall maintain a contemporaneous log to record each change made from one operating scenario to another. *[District Rule 2.13(V)(I)(1)]*
110. **Voluntary Emissions Caps:** The APCO shall issue a permit that contains terms and conditions that allow for trading of emissions increases and decreases within the stationary source solely for the purpose of complying with a voluntary emissions cap established in the permit independent of otherwise applicable federal requirements provided that: *[District Rule 2.13(V)(I)(2)]*
- a. The requirements of conditions 108.a, 108.c, and 108.d, above, are met;
  - b. The terms and conditions are approved by the APCO as quantifiable and enforceable; and
  - c. The terms and conditions are consistent with the applicable pre-construction permit.
111. **Contravening an Express Permit Condition:** The APCO shall allow for changes in operation that contravene an express condition addressing an applicable federal requirement in a permit to operate provided that: *[District Rule 2.13(V)(I)(3)]*
- a. The change will not violate any applicable federal requirement;
  - b. The change will not contravene federally enforceable conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements;
  - c. The change is not a modification under Title I of the CAA or any provision of Rule 6.1(Standards for Permits to Construct);
  - d. The change does not result in exceeding the emissions allowable under the permit, whether expressed therein as a rate of emissions or in terms of total emissions;
  - e. Written notice is given to the U.S. EPA and APCO 30 days in advance of a change, and the notice clearly indicates which term or condition will be contravened, requests operational flexibility under this subsection, describes the change, identifies the emissions units which will be affected, the date on which the change will occur, the duration of the change, any change in emissions of any air pollutant, whether regulated or not, and any new emissions of any air pollutant not emitted before the change, whether regulated or not; and
  - f. The APCO has not provided a written denial to the responsible official within 30 days of receipt of the request for an operational change. The written denial shall identify which of conditions 111.a, 111.b, 111.c, 111.d, or 111.e have not been satisfied.

#### GENERAL OPERATIONAL STANDARDS

112. All terms in this permit are federally enforceable, unless otherwise noted. *[District Rule 2.13(VI)(A)]*
113. The permittee shall ensure the following provisions are adhered to regarding compliance; *[District Rule 2.13 VI (11)]*

- a. The permittee shall comply with all permit conditions;
  - b. The permittee does not convey property rights or exclusive privilege of any sort;
  - c. The non-compliance with any permit condition is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or denial of permit renewal;
  - d. The permittee shall not use the, "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition;
  - e. A pending permit action or notification of anticipated non-compliance does not stay any permit condition; and
  - f. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining: 1) compliance with the permit or, 2) whether or not cause exists for a permit or enforcement action.
114. The "Right of Entry," as stipulated in California Health and Safety Code (H&SC) Section 41510, of Division 26, shall apply at all times. The source shall allow the entry of the District, Air Resource Board (ARB), or EPA officials for the purpose of inspection and sampling, including: *[District Rule 2.13 VI (10)]*
- a. Inspection of the stationary source, including equipment, work practices, operations, and emission-related activity;
  - b. Inspection and duplication of records required by the Permit to Operate; and
  - c. Source sampling or other monitoring activities.
115. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the U.S. EPA Administrator which may include, but not be limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspections of the source. *[40 CFR 60.11(d)]*
116. Persons repairing appliances using chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), or other ozone depleting substances for maintenance, service, or disposal shall comply with all applicable rules. *[40 CFR 82.156]*
117. All recycling and recovery of any CFCs or HCFCs must comply with 40 CFR 82.158. *[40 CFR 82.158, Stratospheric Ozone Protection]*
118. Any technician performing maintenance, service, repair, or disposal of low pressure appliances using CFCs, HCFCs or other ozone depleting material must be certified in accordance with 40 CFR 82.161. *[40 CFR 82.161, Stratospheric Ozone Protection]*
119. All air monitoring data, including emissions data compiled from stationary sources, are public records. *[District Rule 1.3]*
120. All information, analyses, plans, or specifications that disclose the nature, extent, quantity, or degree of air contaminants which any article, machine, equipment, or other contrivance will produce, which the District requires any applicant to provide before such applicant builds, erects, alters, replaces, operates, sells, rents, or uses such article, machine, equipment, or other contrivance, are public records, with the exception of

certified trade secrets. *[District Rule 1.3]*

121. Trade secrets, which may include that information described in the California Government Code Section 6254.7, are not public records. Trade secrets may only be certified upon written request by the owner of said secrets and with concurrence of the APCO. Within 10 days of receipt of any documents containing trade secrets, so designated by the owner, the APCO shall: *[District Rule 1.3]*
  1. Concur in the certification of said trade secrets, and notify the owner that the documents will be placed in a locked file to be made accessible only to the staff of the District or to the public following a court order.
  2. Return to the owner all documents which have been designated as trade secrets, following a determination by the APCO that they are not necessary in conducting the activities of the District.
  3. Notify the owner that said trade secrets do not meet the criteria established, and place the documents in a locked file. All such documents will be considered as public records and will be so designated at the end of a 30-day period, unless the owner files an appeal with the Board of Supervisors (Board). Upon request, any specific public records in the possession of the District may be made available to the public within 10 days. Such requests shall be in writing, and a reasonable fee may be charged, not to exceed the actual cost of providing the requested information.
122. The APCO pursuant to all applicable laws shall enforce these rules and regulations. The pursuit of any one remedy shall not be deemed an election of remedies. All available remedies may be pursued individually, collectively, concurrently, or consecutively, at the option of the APCO. *[District Rule 1.4 (A)]*
123. Any person who violates any provision of District rules and federal Regulations, or any order, permit, rule or regulation of the Air Resources Board or of the District, including the District Hearing Board, is guilty of a misdemeanor and is subject to penalties as provided in the California Health and Safety Code (Sec. 42400, 42400.1, 42400.2, 42400.5 and 42401). *[District Rule 1.4 (B)]*
124. Any person who violates any provision of District rules and federal Regulations, or any order, permit, rule or regulation of the Air Resources Board or of the District, including the District Hearing Board, is liable for civil penalties as provided in the California Health and Safety Code (Sec. 42402, 42402.1, 42402.2, 42402.5 and 42403). *[District Rule 1.4(C)]*
125. If any provisions of this Permit to Operate shall be rendered void or unconstitutional by judicial or other determination, all other parts of this Permit to Operate, which are not expressly held to be void or unconstitutional, shall continue in full force and effect. *[District Rule 1.5]*
126. Any violation of an emission standard, ambient air quality standard, or breakdown of emission measuring instruments, shall be reported to the District in accordance with the "Breakdown Conditions" section of this permit. *[District Rule 2.12]*
127. This Permit to Operate is not transferable, whether by operation of law or otherwise from one location to another, from one person to another, or from one piece of equipment to another, except on written approval of the APCO. *[District Rule 2.3]*
128. In order to determine the nature, extent, quantity, or degree of air contaminants which are, or may be, discharged by this source, the APCO may at any time require from any person subject to the District regulations all of the following: *[District Rule 2.10]*
  - a. Analyses, plans, specifications, and data on the process and production rate, equipment descriptions

- and any other information needed;
- b. Facilities for sampling and testing purposes. The APCO shall identify, in writing, the size and location of the sampling platform. All facilities shall be constructed in accordance with the General Industry Safety Orders of the State of California;
  - c. Testing to determine the emissions of air contaminants; and
  - d. Continuous monitoring equipment to measure and record the source operating conditions and/or contaminant emissions.
129. Except as otherwise provided in these permit conditions, no person shall use open outdoor fires for the purpose of disposal or burning of petroleum wastes, demolition debris, tires, tar, trees, wood waste, or other combustible or flammable solid or liquid waste; or for metal salvage or burning of motor vehicle bodies. *[District Rule 4.3]*
130. No person shall install or use any equipment, which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of this permit. *[District Rule 4.6, 6.1]*
131. By January 15th of each year, all holders of an Authority to Construct or Permit to Operate shall be notified by the District of the annual renewal fee based upon the current fee schedules. The permittee shall pay the initial fee or the annual renewal fee to the District Office in person or may mail postmarked no later than 30 days after notification. *[District Rule 3.1(B)(2)&(4)]*

**APPENDIX A**

**FINAL DRAFT**

## Appendix A: Compliance Assurance Monitoring (CAM)

Emission Unit: B1 (Boiler)

Pollutant: Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)

Control Device: ESP1 (Electrostatic Precipitator)

Emission Limit: PM<sub>10</sub> - 61 lbs/day, PM<sub>2.5</sub> - 57 lbs/day

Monitoring Approach: The monitoring approach for this CAM applicable emission unit is contained in Table 1 below.

Table 1	
<b>A. General Criteria</b>	
Indicator	ESP 1 Power: Secondary Voltage and Secondary Current
Measurement Approach	Secondary voltage is measured using a voltmeter and secondary current is measured using an ammeter. The total power (P) input to the ESP is the sum of the products of the secondary voltage (V) and the current (I) in each field. Provided that the current is sufficient to generate a corona, the secondary voltage becomes the critical parameter in maintaining optimum collection efficiency.
Indicator Range	A minimum voltage and current will be established during initial stack testing. The minimum current will ensure that a corona is produced to charge particles. This will be determined by plotting voltage/current to determine the break point at which corona is established. The minimum voltage of the ESP fields will be maintained at greater than 110% of the minimum voltage established in the initial stack testing to ensure there is sufficient attraction of the charged particles to the collector plates.
<b>B. Performance Criteria</b>	
Data Representativeness	The secondary voltage and current for each ESP field are directly measured using instrumentation integrated in the ESP unit to measure and control the particulate collection efficiency.
Verification of Operational Status	Monitoring of the voltage and current of each ESP field.
Quality Assurance/Quality Control	Calibration, maintenance, and operation of instrumentation using procedures that takes into account manufacturer's specifications.
Monitoring Frequency	Roseburg Forest Products will identify the monitoring frequency when the Voltage/Current curve is generated.
Data Collection Procedures	Roseburg Forest Products will identify the data collection procedures when the Voltage/Current curve is generated. Records will be maintained in accordance with permit Condition 29.
Averaging Period	Roseburg Forest Products will identify the averaging period when the Voltage/Current curve is generated.
Stack Test/Monitoring Initiation	Roseburg Forest Products will identify the minimum threshold current at which corona is produced and a voltage above which compliance with emission limits is achieved by generating a Voltage/Current curve. If adequate data is not currently available Roseburg Forest Products will schedule and conduct an EPA Method 5 test to set this threshold and demonstrate compliance with emission limits and opacity.

FINAL DRAFT