Title V Operational Permit
Technical Review and Statement of Basis

1.0 BACKGROUND

Roseburg Forest Products Co. is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR) and SCAPCD Rule 2.13 (Additional Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990), because it is a major source as defined by SCAPCD Rule 2.13. It is a major source because it has the "potential to emit", as defined by SCAPCP Rule 2.13, more than 100 tons per year of a regulated air pollutant.

2.0 FACILITY INFORMATION

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3.0 FACILITY DESCRIPTION

The Roseburg Forest Products Weed facility produces softwood veneer measured on a 3/8" basis at a production rate of 249,660 MSF/year. The veneer is produced from wood logs that are harvested from forests. When the wood logs reach the facility, they are loaded on the debarker deck where the bark is removed and the logs are cut to a predetermined length. The logs are then transported on a conveyor to the steam vats were they are exposed to elevated temperature and moisture. The logs are removed from the vats using a loader, which then places the steamed logs onto a feeder to the veneer lathe. The logs are then peeled into sheets of veneer in a variety of thicknesses measured on a 3/8" basis. The veneer then travels on a conveyor where it is clipped into sheets up to 54" in width. After being cut into sheets, the veneer is separated and stacked according to type and size. If drying is required, the sheets are routed to the veneer dryers where heat generated from steam removes the moisture from the green veneer. Veneer dryer emissions are controlled by a regenerative catalytic oxidizer. In some cases the veneer is shipped green (wet). The veneer is then stacked and bound for shipping. The facility also produces decorative landscape timbers from the peeler cores by staining the wood in a low pressure spray booth using a water based stain.

Wood residuals from the log debarking process, residuals from the veneer manufacturing process, and off-site wood chips and other residuals are used as fuel for the wood-fired boiler. The wood-fired boiler produces super-heated steam used to drive a steam turbine capable of generating up to 15 MW of electricity. The de-energized steam after the turbine retains enough residual heat to provide the necessary heat input to the water in the log vats, the two indirect heated veneer dryers, and the manufacturing buildings. The emissions from the hogged fuel boiler are controlled by selective non-catalytic reduction (SNCR), multiclones, and an electrostatic precipitator. A continuous emission monitoring system measures NO_x, CO, O_2 and flow to demonstrate compliance with pollutant emission limits and maintain the performance of the SNCR system. A continuous opacity monitor is used to demonstrate compliance with opacity limitations.

4.0 SISKIYOU COUNTY AMBIENT AIR QUALITY STATUS

Siskiyou County is located within the Northeast Plateau Air Basin. This air basin is designated as attainment, unclassified or unclassified/attainment with respect to all National Ambient Air Quality Standards. With respect to the California State Ambient Air Quality Standards, the air basin is designated attainment or unclassified for all pollutants. The ambient air quality standards currently in effect are as follows:

SISKIYOU COUNTY AIR QUALITY ATTAINMENT STATUS

Pollutant	Averaging Time	California Standard		State Standard Attainment Status	National Primary Standard		National Standard Attainment Status
Ozone	1 hour	0.09 ppm		Attainment	–	1	Unclassified/ Attainment
	8 hours	0.070 ppm	2		0.075 ppm		
Carbon Monoxide	1 hour	20 ppm		Unclassified	35 ppm		Unclassified/ Attainment
	8 hours	9.0 ppm			9 ppm		
Nitrogen Dioxide	1 hour	0.18 ppm		Attainment	–		Unclassified/ Attainment
	Annual Avg.	0.030			0.053 ppm		
Sulfur Dioxide	1 hour	0.25 ppm		Attainment	–		Unclassified
	24 hours	0.04 ppm			0.14 ppm		
	Annual Avg.	–			0.030 ppm		
Respirable Particulate Matter (PM_{10})	24 hours	50 µg/m^3		Attainment	150 µg/m^3		Unclassified
	Annual Avg.	20 µg/m^3			–		
Fine Particulate Matter ($PM_{2.5}$)	24 hours	–		Attainment	35 µg/m^3		Unclassifiable/ Attainment
	Annual Avg.	12 µg/m^3			15 µg/m^3		
Lead	30-day avg.	1.5 µg/m^3		Attainment	–		Attainment
	Quarterly	–			1.5 µg/m^3		
	Rolling 3-month avg.	–			0.15 µg/m^3	3	
Hydrogen Sulfide	1 hour	0.03 ppm		Unclassified	No Federal Standards		
Sulfates	24 hour	25 µg/m^3		Attainment			
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more		Unclassified			
Vinyl Chloride	24 hours	0.01 ppm		--			

Notes:

[1] Federal One Hour Ozone National Ambient Air Quality Standard was revoked on June 15, 2005.

[2] This concentration was approved by the Air Resources Board on April 28, 2005 and became effective May 17, 2006.

[3] National lead standard, rolling 3-month average: final rule signed October 15, 2008.

Source: California Air Resources Board. Area Designation Maps, http://www.arb.ca.gov/desig/adm/adm.htm, Maps current as of February, 2012.

5.0 PERMIT CONTENT

This review report is intended to provide the legal and factual basis for the draft permit conditions for the Roseburg Forest Products Weed, California facility Title V Permit. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation.

5.1 Equipment Description

5.1.1 Insignificant Sources

The following table lists equipment and sources of pollutants for which a permit is not required:

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)	The liquids in this tank is of sufficiently low vapor pressure
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)	The liquids in this tank is of sufficiently low vapor pressure
Landscape timber product (peeler cores) spray booth	N/A	District Rule 2.13 IV (C)(1)(q)	Landscape timber products are stained with a no VOC water-based stain

The basis for all of the insignificant activities is SCAPCD Rule 2.13 IV(C)(1)(q), since each source is an activity, process, or emissions unit which is not subject to a source-specific applicable federal requirement and which emits no more than 0.5 tons per year of a HAP and no more than two tons per year of a regulated air pollutant that is not a HAP.

5.1.2 Permitted Devices

The following table lists the equipment units which are required to be contained in the permit:

EU ID	Emission Unit Description	Manufacturer	Capacity
B1	Boiler	Foster Wheeler	130,000 lbs steam / hr
CT1	Cooling Tower	Midwest Towers	N/A
D3	Veneer Dryer #3	Moore Dry Kiln Co.	10,000 SF (3/8" basis) / hr
D4	Veneer Dryer #4	Moore Dry Kiln Co.	18,500 SF (3/8" basis) / hr
C1	Truck Unload/Transfer Cyclone (Material Handling)	None	N/A
C2	Fines Cyclone (Material Handling)	None	N/A
C3	Chip Bin Cyclone (Material Handling)	None	N/A
C4	Cleanup/Spillage Cyclone (Material Handling)	None	N/A
C5	Clipper/Diverter Cyclone (Material Handling)	None	N/A

EU ID	Emission Unit Description	Manufacturer	Capacity
F1	Material Handling Fugitives (Log Debarker, Chipper, Hog, Hogged Fuel Piles, Chip Piles)	Various	N/A
G1	Stationary Internal Combustion Engines/ Generators	Various	N/A
LV1	Log Vats	None	60,000 SF (3/8" basis)/hr

5.1.3 Control Equipment

The facility employs several different strategies to control air pollution including the use of combustion equipment, specialized control devices and best management practices. The following table lists the pollution control equipment installed to reduce the quantity of pollution released by the emission units at the facility:

Pollution Control Device Identification

Emission Unit		Control Device	
ID	Description	ID	Description
B1	Boiler[1]	SNCR	Selective Non-Catalytic Reduction
		ESP1	Electrostatic Precipitator
D3	Veneer Dryer #3	RCO1	Regenerative Catalytic Oxidizer
D4	Veneer Dryer #4	RCO1	Regenerative Catalytic Oxidizer

[1] The boiler also has a multiclone used as inherent process equipment.

Add-on pollution control equipment are installed on the boiler to reduce PM and NO_X emissions. Selective non-catalytic reduction, which consists of urea injected into the boiler combustion chamber, is installed to control NO_X emissions from the boiler. Control of PM emissions is attained through an electrostatic precipitator.

A regenerative catalytic oxidizer (RCO) controls emissions from both veneer dryers. The RCO replaced the wet scrubbers installed on each dryer and was installed to control volatile HAP emissions for compliance with the Plywood and Composite Wood Products NESHAP. The RCO also controls VOC emissions.

5.1.4 Monitoring Equipment

Continuous Emissions Monitors (CEM) /Continuous Parameter Monitors (CPM)

Emission Unit/Control Device		CEM/CPM Equipment
ID	Description	
B1	Boiler	NO_X, CO, O_2, Flow, Opacity
RCO1	Regenerative Catalytic Oxidizer	Temperature

The facility has installed continuous monitoring systems on the boiler consisting of analyzers for carbon monoxide (CO), oxides of nitrogen (NO_X), flow and oxygen (O_2), as well as a continuous opacity monitoring (COM) equipment measuring visible emissions. A continuous parameter monitor (CPM) was installed on the RCO to monitor the combustion temperature.

5.2 Emissions

Plant Site Emissions

Provided below is a summary of the total plant site emissions rates as provided in the application:

Pollutant	Plant Site Emission Rate (tons/yr)
PM	143
PM_{10}	82
$PM_{2.5}$	21
CO	406
NO_x	124
SO_2	25
VOC	49
GHG (total CO2e w/ biogenic CO2)	217,286
GHG (CO2e w/o biogenic CO_2)	8,336

The Roseburg Forest Products Weed, California facility Title V permit application relied upon NCASI (National Council for Air and Stream Improvement, Inc.) emission factors for many sources. The hierarchy for emission factors from least accurate to most accurate is AP-42, industry specific data, facility specific data and continuous emissions monitoring systems (CEMS) data. NCASI is an independent, non-profit research institute that focuses on environmental topics of interest to the forest products industry. NCASI data are considered highly reputable, are commonly employed by permitting agencies across the county, and therefore the air district has relied on NCASI emission factors, where appropriate, in issuing the permit.

Hazardous Air Pollutants

Historically, the Weed facility was a major source of hazardous air pollutant (HAP) emissions because the estimated potential emission rates of at least one individual HAP was more than the 10 tons/year threshold and the aggregated HAPs emission rate was greater than the 25 tons/year threshold. The facility became subject to the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (40 CFR 63 Subpart DDDD) in 2004 and installed an RCO for the veneer dryers exhaust to control HAP emissions.

Currently, the facility is an area (minor) source of HAPs, due to emission controls installed for the PCWP NESHAP, and the estimated potential emission rates of all individual HAPs are less than the 10 tons/year threshold and the aggregated HAPs emission rate is less than the 25 tons/year threshold. Total aggregate HAP emissions are estimated at 11.43 tons/year and the maximum single HAP emission rate (formaldehyde) is estimated to be 5.96 tons/year.

In its 1995 memorandum entitled *Potential to Emit for MACT Standards—Guidance on Timing Issues,* EPA stated that "A facility that is subject to a MACT standard is not necessarily a major source for future MACT standards. For example, if after compliance with a MACT standard, a source's potential to emit is less than the 10/25 tons per year applicability level, the EPA will consider the facility an area source for purposes of the subsequent standard." Since the facility is now an area source of HAP emissions, any new NESHAP requirements applicable to major HAP sources would not apply. However, under EPA's "Once In, Always In" policy, the facility remains subject to any NESHAP that took effect prior to the date that the PCWP NESHAP imposed the federally enforceable requirement to operate the veneer dryer controls. Applicability determinations for each potentially applicable NESHAP are addressed in Section 5.4 below.

HAP	CAS	Total (ton/yr)
1,1,2-Trichloroethane	79005	0.12
Acetaldehyde	75070	0.49
Carbon Disulfide	75150	0.13
Dichloromethane	75092	0.53
Formaldehyde	50000	5.96
Hexane	110543	0.35
Hydrogen chloride	7647010	0.66
Methanol	67561	1.37
Naphthalene	91203	0.16
Propionaldehyde	123386	0.12
Styrene	100425	0.63
Manganese	7439965	0.15
Total HAPs		**11.43**
Max Single HAP		**5.96**

5.3 District Applicable Requirements

Applicable Siskiyou County Air Pollution Control District Rules are identified below.

Siskiyou County Air Pollution Control District Rules				
Regulation		**Applicable**		**Comments**
		Yes	**No**	
1	General Provisions	X		
2	Permit System	X		This facility is a Title V permit source and Regulation 2.13 would also apply
3	Fees	X		
4.1	Visible emissions	X		Applicable to the boiler, veneer dryers, log vats debarker, chippers and hog, cyclones, and fugitive sources (paved road traffic and wood storage piles)
4.2	Nuisance	X		Applicable to the entire facility
4.3	Non-Agricultural Burning	X		Applicable to the entire facility
4.4(A)	Specific Air Contaminant (sulfur compounds)	X		Applicable to the boiler and RCO
4.4(B)	Specific Air Contaminant: Combustion Contaminants	X		Applicable to the boiler and RCO
4.4(B)	Specific Air Contaminant: (fluorine compounds)		X	This facility does not emit this pollutant
4.4 (D)	Specific Air Contaminant	X		Applicable to the boiler and RCO

Siskiyou County Air Pollution Control District Rules				
Regulation		Applicable		Comments
		Yes	No	
	(oxides of nitrogen)			
4.5	Particulate Matter	X		Applicable to the veneer dryers, log vats, and cyclones.
4.6	Circumvention	X		
4.7	Gasoline Storage	X		
4.8	Combination of Emissions	X		Applicable to the veneer dryers/RCO
4.9	Separation of Emissions	X		
4.10	Reduction of Animal Matter		X	The facility does not perform this activity.
4.11	Orchard and Citrus Heaters		X	This facility does not use this equipment
4.12	New Source Performance Standards	X		Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units applies to the boiler.
4.13	National Standards for Hazardous Air Pollutants	X		Subpart M, National Emission Standard for Asbestos applies during demolition or renovation.
4.14	Sulfur Contents of Fuels	X		Applicable to the entire facility.
5	Procedures Before the Hearing Board	X		
6	New Source Siting	X		
7	Agricultural Burning		X	The facility does not perform this activity.
8.1	Benzene Emissions from Retail Service Stations		X	The facility does not perform this activity.
8.2	Aeration of Contaminated Soil and Removal of Underground Storage Tanks	X		Applicable when these actions are performed.
8.3	Hexavalent Chromium Emissions from Chrome Plating		X	The facility does not perform this activity.
8.4	Hexavalent Chromium Airborne Toxic Control Measure	X		Applicable to the cooling tower
8.5	Ethylene Oxide Airborne Toxic Control Measure		X	The facility does not perform this activity.
8.6	Dioxins Airborne Toxic Control Measure		X	The facility does not perform this activity.
8.7	Asbestos Airborne Toxic Control Measure		X	
8.8	Airborne Toxic Control Measure		X	The facility does not perform this activity.

5.4 Federal Applicable Requirements—Applicability Determinations

Federal rules were reviewed to determine applicability to specific sources at the Weed facility. Each rule is labeled as to whether it is "Applicable" or "Inapplicable". For applicable rules, the emission limits and monitoring requirements are detailed. For inapplicable rules, the justification as to why it is not applicable is provided.

Applicable Requirement: 40 CFR 60 Subpart Db – Standards of Performance for Industrial, Commercial, and Institutional Steam Generating Units

This federal regulation limits the emission of oxides of sulfur, particulate, oxides of nitrogen, and opacity from industrial steam generating units with a heat input greater than 100 million BTU/hour, which commenced construction after June 19th, 1984. This regulation applies to the Boiler (Emission Unit B1).

Sulfur Oxides - Since the boiler does not combust coal or fuel oil, it is not subject to sulfur oxide limitations of §60.42b.

Particulate Matter - Because the boiler has a heat input capacity from wood which is greater than 30%, the modification of the boiler commenced after February 28th 2005, and the boiler has a maximum heat capacity under 250 MMBtu/hr, particulate matter emissions are limited to 0.10 lb/MMBtu heat input [§60.43b(h)(3)].

Nitrogen Oxides - Since the boiler does not combust coal, fuel oil or natural gas, the nitrogen oxide limitations of §60.44b do not apply.

Opacity - Because the boiler combusts wood, the opacity of the exhaust gases emitted shall not exhibit greater than 20 percent opacity (6 minute average), except for one 6 minute period per hour of not more than 27 percent opacity [§60.43b(f)]. Because the boiler is subject to an opacity standard, §60.48b(a) requires the installation of a COMs unit to measure opacity according to the requirements of 40 CFR 60 Subpart A.

COMs & CEMs - §60.48b requires an affected facility which is subject to an opacity standard, to install, calibrate, maintain, and operate a COMs for measuring and recording the opacity of its exhaust gases.

Conditions 9, 10, 18, 20, 22, 23, and 25 contain the opacity and particulate matter limitations, the testing requirements, and monitoring requirements for this subpart.

Applicable Requirement: 40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (PCWP)

The facility was a major source of HAPs on October 1, 2007 when the first substantive requirement under the Subpart DDDD NESHAP took effect. Therefore, the facility is a major source of HAPs for purposes of the PCWP NESHAP and Subpart DDDD is an applicable requirement.

This regulation limits the emissions of hazardous air pollutants (HAPs) at major HAP source facilities that manufacture dry veneer, kiln dried lumber, plywood, and/or composite wood products. The affected emission units subject to the PCWP NESHAP requirements are Veneer Dryer #3 (D3) and Veneer Dryer #4 (D4).

The proposed PCWP NESHAP provides three compliance options:

- Production-based compliance options that are based on units of mass of pollutant per unit of production
- Add-on control system compliance options
- Emissions averaging compliance option

RFP has chosen to use add-on controls, allowing the following six options for demonstrating compliance. These six options are listed in Table 1B of the MACT, with operating requirements for each identified in Table 2.

1. Reduce emissions of total HAP, measured as THC (as carbon), by 90 percent. You may choose to subtract methane from THC as carbon measurements; or
2. Limit emissions of total HAP, measured as THC (as carbon) a, to 20 ppmvd. You may choose to subtract methane from THC as carbon measurements; 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.

Compliance is achieved by the use of a regenerative catalytic oxidizer (RCO1) controlling emissions from the veneer dryer heated zones. The facility demonstrated initial compliance using Option (3) of Table 1B and showed a reduction of methanol emissions by 90%. The facility has the option to use any of the six (6) available compliance options specified in Table 1B of the PCWP NESHAP for future compliance demonstrations. In accordance with the requirements for catalytic oxidizers specified in Table 2 of this subpart, the permittee maintains the 3-hour average firebox temperature greater than the minimum temperature established during the most recent performance test for the catalytic oxidizer (RCO1), and periodically monitors the condition of the catalyst. Additionally, since softwood veneer is dried in the veneer dryers, fugitive emissions from the dryer doors and the green end shall be minimized as required by the work practice requirement specified in Table 3. Although RFP does not have a dedicated veneer redryer, the redry moisture content requirements are included in the permit to give the facility the flexibility to utilize this choice in the future.

Conditions 40 through 44 and 46 through 51 contain the compliance options, operating and work practice requirements, monitoring requirements and recordkeeping requirements.

The PCWP NESHAP affected source includes finishing operations not subject to other NESHAP that are associated with the manufacturing of plywood and composite wood products. As is explained below, the peeler core staining process is not covered by any other NESHAP. Therefore, it is part of the PCWP NESHAP affected source. However, there are no requirements applied by the NESHAP. The peeler core staining process is not within the definition of a "Group 1 miscellaneous coating operation," which is the only type of coating process covered by the PCWP NESHAP. Group 1 miscellaneous coating operations is defined in 63.2292 as "application of edge seals, nail lines, logo (or other information) paint, shelving edge fillers, trademark/gradestamp inks, and wood putty patches to plywood and composite wood products (except kiln-dried lumber) on the same site where the plywood and composite wood products are manufactured." As the peeler core stain is not any of these specified coatings, it is not subject to the Group 1 miscellaneous coating standards.

Applicable Requirement: 40 CFR Part 63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [RICE])

The facility will be an area source of HAPs on May 3, 2013 when the first substantive requirement under the Subpart ZZZZ NESHAP takes effect. Therefore, the area source standards of Subpart ZZZZ are applicable requirements for the facility. This regulation establishes operating and maintenance requirements as well as emission standards for HAPs emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAPs. Conditions 75 and 79 contain the limitations and monitoring requirements for this subpart.

Inapplicable Requirement: 40 CFR 63 Subpart QQQQ (Surface Coating of Wood Building Products)

The Surface Coating of Wood Building Products NESHAP does not apply to the peeler core stain process. In 63.4681(a) EPA defined the regulated source category as the "surface coating of wood building products, which means the application of coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building." The peeler cores do not meet the criterion that they be used in the construction of buildings. The peeler cores are not sold or intended for any sort of building construction application. They are sold exclusively for use as decorative landscape timbers. Therefore, Subpart QQQQ is an inapplicable requirement.

Inapplicable Requirement: 40 CFR 63 Subpart HHHHHH (Miscellaneous Surface Coating Operations)

The Miscellaneous Surface Coating Operations NESHAP applies only at area sources. The facility was an area source of HAPs on January 10, 2011 when the first substantive requirement under the Subpart HHHHHH NESHAP took effect. However, Subpart HHHHHH defines miscellaneous surface coating operations as the application of "surface coating to miscellaneous parts and/or products made of metal or plastic... Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart." (63.11180) As the only coating operations that occur at the facility involve the coating of wood, Subpart HHHHHH is not an applicable rule.

Applicable Requirement: 40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

The facility will be an area source of HAPs when the proposed first substantive requirement under the Subpart JJJJJJ NESHAP takes effect. This rule limits HAP emissions from area sources of HAPs. The facility became an area or minor HAP source once the RCO1 was installed to comply with the PCWPNESHAP. The Weed facility boiler is an existing source since construction or reconstruction was commenced before June 4, 2010 and it falls under the biomass boiler category, since it burns greater than 15 percent biomass on a total fuel annual heat input basis.

There are no emission limitations for existing biomass boilers in Table 1 to Subpart JJJJJJ, only work practice standards, emission reductions measures, and management practices. For existing biomass boilers, a biennial tune up of the boiler and a one-time energy assessment performed by a qualified energy assessor is required under Table 2 to Subpart JJJJJJ. There are no testing or monitoring requirements.

Condition 17 adopts by reference the work practice standards, emission reductions measures, and management practices applicable to an existing biomass fired boiler.

Inapplicable Requirement: 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

The facility will be an area source of HAPs on the date that the first substantive requirement under the major source Subpart DDDDD NESHAP will take effect. Therefore, the facility is subject to the Subpart JJJJJJ area source NESHAP and not the Subpart DDDDD major source NESHAP.

Applicable Requirement: 40 CFR 64 Compliance Assurance Monitoring (CAM)

The Compliance Assurance Monitoring (CAM) rule applies to sources that operate emission units with pre-controlled potential emissions at or above the major source thresholds that rely on control devices to comply with applicable requirements. CAM does not apply to sources with emission limitations or standards in a NSPS or NESHAP proposed after November 15, 1990 or emission limits or standards for which the Title V permit already specifies a continuous compliance determination method. The only controls used to comply with a standard are the veneer dryer RCO and the boiler SNCR, multiclone and ESP. The veneer dryer RCO is used to comply with a standard in the PCWP NESHAP which is a NESHAP proposed after 1990. Therefore, a CAM plan is not required for the veneer dryer RCO. The SNCR is used to control NOx and the permit already contains conditions which require continuous monitoring using a CEM. Therefore, a CAM plan is not required for the boiler SNCR. The multiclone is used as inherent process equipment to capture sparks for fire control and so a CAM plan is not required. The ESP is continuously monitored using a COM, but opacity monitoring does not necessarily relate to particulate emissions. Therefore, a CAM plan is required for the ESP. The facility has prepared an approved CAM plan for the ESP and it is included as Appendix A of the permit.

Inapplicable Requirement: 40 CFR 72 through 75, Acid Rain
This facility is not an affected facility as defined in 40 CFR 72 through 75 because it does not combust fossil fuel and does not distribute 25 MW or more to the grid; therefore the Acid Rain Permit requirements do not apply.

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

Insignificant Activities
The facility has insignificant activities as defined in District Rule 2.13 IV [C][1][q]. The standards that usually apply to insignificant activities are for opacity (40%) and particulate matter (0.30 gr/scf). The District does not consider it likely that these insignificant activities could exceed an applicable emissions limit or standard because these insignificant activities are generally equipment or activities that do not have emissions controls and do not typically have visible emissions. Since there are no controls, no visible emissions, and the emissions are less than two tons per year, the District does not believe that specific monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

Applicable Requirements
Specific district and federal requirements (e.g. emission limits or standards) that have been determined to be applicable to the Weed facility, along with the associated monitoring, recordkeeping, and reporting that are necessary to determine compliance with the applicable requirements, are incorporated into the Title V permit under each emission unit section. All conditions in the permit are enforceable by both the EPA and State, except for any conditions referenced in Tables 3, 4, 6, 8, 9, 10, 12 and 13 as not federally enforceable.

Testing Requirements
These sections of the permit provide the District with test methods and procedures to be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more tests than those specified in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, the District and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may volunteer to conduct testing to confirm the compliance status.

Monitoring and Recordkeeping Requirements
40 CFR 70.6(a)(3)(i) requires that all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit. The requirement to include monitoring sufficient to assure compliance does not require that the permit impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emissions unit is not threatened by a lack of regular monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e. no monitoring) will meet section 70.6(a)(3)(i).

The records of all monitoring specified in this Title V Operating Permit must be kept at the plant site for at least 5 years, unless a longer period is specified (for certain NSPS data). All records necessary to determine compliance with any permit condition shall be made available to the District/EPA inspectors upon request.

Reporting Requirements

The permittee is required to submit a monitoring report every six months certifying that the monitoring requirements have been completed and identifying any deviation from the permit monitoring requirements. By March 15 of each year the permittee is required to submit 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 permittee must also submit semi-annual NSPS reports addressing boiler opacity.

5.6 Compliance Schedule

A compliance schedule is required in all Title V permits where the source is not in compliance with all applicable requirements pursuant to SCAPCD Rule 2.13(VI)(B)(9). Since the APCD has not determined that the facility is out of compliance with any applicable requirements, a compliance schedule is not required or appropriate.

5.7 Permit Shield

The facility is entitled to the permit shield for those requirements identified as inapplicable in sections 5.3 and 5.4 above.

6.0 ALTERNATE OPERATING SCENARIO

No alternate operating scenarios have been requested for this facility.

7.0 COMPLIANCE STATUS

Reviews of the permit files for this facility indicate that the facility is operating in compliance with all applicable requirements.