Georgia-Pacific Wood Products LLC
Hosford OSB

Facility ID No. 0770010
Liberty County

DRAFT Title V Air Operation Permit Renewal

Permit No. 0770010-012-AV
(Renewal of Title V Air Operation Permit No. 0770010-003-AV)

Permitting and Compliance Authority:
State of Florida
Department of Environmental Protection
Air Resource Management, Northwest District

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Pensacola, Florida 32502-5740

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DRAFT Title V Air Operation Permit Renewal

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DRAFT PERMIT

PERMITTEE:
Georgia-Pacific Wood Products LLC
12995 Northeast State Road 65
Hosford, Florida 32334-0322

Permit No. 0770010-012-AV
Hosford OSB
Facility Id No. 0770010
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing Hosford OSB facility is located in Liberty County at 12995 Northeast State Road 65, Hosford, Florida. UTM Coordinates are: Zone 16, 713.5 km East and 3369.5 km North. Latitude is: 30° 26' 25" North; and, Longitude is: 84° 45' 16" West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft)

_____

Rick Bradburn
Air Program Administrator

RB/dm/c

Subsection A. Facility Description.

This Oriented Strand Board (OSB) facility consists of four principal manufacturing processes: (1) furnish production, which includes debarking, slashing, and flaking; (2) flake drying; (3) forming and pressing; and (4) finishing, which consists of trimming (sawing), sanding and edge sealing. The facility has a maximum annual production rate of 600 million board-feet based on a 3/8-inch thickness.

Logs are unloaded and temporarily stored in the log yard. The logs are then debarked and processed into flakes. The drying process consists of five flake dryers (horizontal, cylindrical rotary drum-type) heated by suspension-type burners that combust wood residuals. The suspension type burners are designed to burn processed wood fuel. Raw wood fuel is processed in the hammer mill to reduce raw fuel to the appropriate size and then stored in a metering bin. From the metering bin, the ground wood fuel is pneumatically transferred and blown into the burner. The wood fuel is introduced tangentially to the burners, creating a cyclonic flow pattern, thereby promoting combustion efficiency.

The flue gases leave the combustion zone at approximately $1,600^0$F, but are immediately cooled by the addition of ambient air between the burner and the dryer infeed. The hot exhaust from the burners combines with ambient air pulled through by the dryer's pneumatic system to dry the flakes. The amount of ambient air introduced and resulting gas temperature at the dryer inlet are dependent on the dryer operating rate, wood moisture content, desired moisture content of the furnish, etc. Air pollutant emissions associated with the drying operation include products of wood fuel combustion, such as Particulate Matter (PM), Volatile Organic Compounds (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NOx) and Sulfur Dioxide (SO_2), and various hazardous air pollutants (HAPs). PM, VOC, CO and various HAP emissions are also produced from the flake drying process itself. The emissions from the dryers are controlled by multiclones (one on each dryer) followed in series by two regenerative thermal oxidizers (RTO) which are operated in parallel.

The dried wood flakes are blended with resin and wax and formed into a mat on the forming line in layers oriented at right angles to provide structural integrity. Once the appropriate mat thickness has been achieved, the mat is transferred into the thermal oil-heated press, where under heat and pressure, the resin bonds with the flakes to form the structural panel known as OSB. The thermal oil is heated to the appropriate temperature in a separate system consisting of two, wood fuel, suspension-type burners. During normal operations, the exhaust gases from the thermal oil system burners are routed through the dryer system, to assist heating. Air pollutant emissions associated with the board press operation include PM, VOC, CO, NOx and various HAPs. The press is controlled by a Thermal Catalytic Oxidizer (TCO)/Regenerative Catalytic Oxidizer (RCO). The only difference between the RTO and a TCO/RCO is that in a TCO/RCO a portion of the heat retention media is replaced with a precious metal catalyst to allow operation at lower temperatures. Therefore, the press control device has the flexibility to operate as an RTO/RCO/TCO.

An electrostatic precipitator (ESP) controls the Thermal Oil Heater (TOH) exhaust during periods when the wood fuel is being combusted. Once the exhaust gases pass through the ESP, they are conveyed to the flake dryers and to their associated RTOs prior to being exhausted to the atmosphere. If the TOH has to abort to the atmosphere due to a malfunction or other abnormal condition (e.g., start-up or shut down), it will exhaust through the TOH abort stack or the ESP abort stack using only natural gas (other than the short period of time required to make the transition form wood fuel to gas in the event of a sudden shutdown of the dryer). Air pollutant emissions associated with TOH operation include PM, VOC, CO, NO_x and trace amounts of SO_2 and HAPs.

Upon exiting the press, the OSB is cut to size, and miscellaneous coating operations may be performed prior to packaging and shipping the finished OSB off site. The dry end material generated during the cutting and finishing operations is either used as fuel to heat the dryers and thermal oil system or shipped off site for use as wood fuel or as furnish in other wood products manufacturing operations.

Numerous material handling operations, which represent both point sources and fugitive emission sources, are associated with production of the OSB. Those operations that can be characterized as point sources include the screen fines with saw trim transfer pneumatics, saw trim and finishing line pneumatics, materials reject and flying saw pneumatics, specialty saw and sander pneumatics, fuel system pneumatics, forming bin pneumatics, and hammer mill system pneumatics. The pollutant emissions from these operations are PM, VOC, and various HAPs. PM emissions resulting from these material handling systems are controlled by fabric filters.

Fugitive sources of PM include the bark handling (batch drops and wind erosion from storage piles), paved roads, debarkers, bark hog, and miscellaneous coating operations. Fugitive emission sources of VOC and/or various HAPs occur from the miscellaneous coating operations (edge seal, nail lines, stencil, grade stamps, etc.), overlay process, and flake blending.

An overlay process was added to the existing facility as part of the finishing process. The overlay operation receives panels from the finishing line or other board substrates, (i.e., off-site plywood), and operates in parallel to other finishing operations. The overlay line applies adhesive glue and then applies overlay onto the board substrate. VOC and HAP emissions from this process come from the adhesive used to attach the overlay.

In addition to the main production activities, there are a number of activities that support the main operation of the facility, including storage tanks for wax and fuels, facility roads, and internal combustion engines (ICE) associated with emergency equipment.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Five Flake Dryers with two RTOs
002	Panel Press with one RTO/TCO/RCO
003	Screen fines with saw trim transfer baghouse exhaust
004	Saw trim/finishing baghouse exhaust
005	Mat reject/flying saw baghouse exhaust
006	Specialty saw/sander baghouse exhaust
007	Fuel system pneumatics baghouse exhaust
008	Forming bins baghouse exhaust
009	Hammer mill baghouse exhaust
011	Thermal oil system ESP (bypass stacks)
012	Emergency Generator (1314 hp) and Fire Pump Engine (218 hp) (work practice requirements for pump engine beginning May 3, 2013)
013	Overlay process
014	Miscellaneous Coating Operations (edge seal, stencil, grade stamps)
Unregulated Emissions Units and Activities	
010	Fugitives (roads, piles, bins, bark hog, and debarker)

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received April 22, 2011, this facility is a major source of hazardous air pollutants (HAP), based on potential point source and fugitive emissions of formaldehyde and total HAP. The facility is subject to 40 CFR Part 63, subpart DDDD (National Emission Standards for

Hazardous Air Pollutants for Plywood Composite and Wood Products (PCWP). The facility has chosen the compliance option for add-on control systems, specifically the option to reduce emissions of total HAP, measured as THC (as carbon), by 90 percent per 40 CFR63.2240(b) and Table 1B to subpart DDDD of part 63 option (1). However, the facility may choose other add-on control systems compliance options from the PCWP MACT to demonstrate compliance. The emission units and fugitive sources are subject to limits determined as BACT for PM and VE, NOx, CO and VOC. Because this facility operates two stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ, - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. However, since the engines being operated meet the Subpart ZZZZ definition of "existing units", there are no unit specific applicable requirements that must be met pursuant to this rule at this time but beginning May 3, 2013, the emergency fire pump engine will have to comply with work practice requirements. The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	**EU No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	011
40 CFR 60, Subpart Dc, NSPS, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	011
40 CFR 63, Subpart A, NESHAP General Provisions	001, 002, 012, 013, 014
40 CFR 63, Subpart DDDD, NESHAP Plywood and Composite Wood Products	001, 002, 014
40 CFR 63, Subpart QQQQ, NESHAP Surface Coating of Wood Building Products	013
40 CFR 63, Subpart ZZZZ, NESHAP Stationary Reciprocating Internal Combustion Engines	012
40 CFR 64, Compliance Assurance Monitoring	001, 002, 011
Rules 62-4, 62-204, 62-210, 62-212, 62-213, 62-296.320, 62-297, F.A.C. and BACT	all

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.

a. All VOC containers shall be tightly covered when not in use.
b. Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
c. All equipment, pipes, hoses, lids, fittings, etc., shall be operated/maintained in such a manner as to minimize leaks, fugitive emissions and spills of VOC materials.
d. Excessive air turbulence across exposed VOC's shall be prevented.
e. Any VOC spillage shall be immediately confined and cleaned up. Wastes shall be placed in appropriate and closed containers for reuse, recycling, or appropriate disposal.

[Rule 62-296.320(1)(a), F.A.C. and Permit 0770010-002-AC]
{Permitting Note: Fugitive sources of VOC are the blenders where chips are blended with wax, and additives; and finished product storage. The specific formulation is not limited by this permit provided fugitive emissions will not exceed the estimate for this permit. The precautions specified above constitute BACT and are estimated to limit potential emissions for fugitive VOC to 1 TPY.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Paving and maintenance of roads, parking areas and yards.
b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c. Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e. Landscaping or planting of vegetation.
f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
g. Confining abrasive blasting where possible.

h. Enclosure or covering of conveyor systems.
i. The drum debarkers and bark hog shall be enclosed to the extent practicable.
j. Bark by-product transfer points and chutes shall be enclosed to the extent necessary to minimize the emissions of unconfined particulate matter.
k. Bark storage piles shall be enclosed on three sides and shaped and oriented to minimize wind erosion.
l. The manufacturing area and access roadways for the facility shall be paved with asphalt or concrete, and shall be swept or vacuumed as needed to prevent the emissions of unconfined particulate matter.

[Rule 62-296.320(4)(c) and 62-212.400, F.A.C., BACT and Permit 0770010-002-AC]

{Permitting Note: The areas for log transfer to the debarking operations and service road are not required to be paved. Fugitive sources of particulate matter are bark handling, wind erosion of bark stockpiles, drum debarkers, bark hog, and road traffic on paved and unpaved roads. The precautions specified above constitute BACT and are estimated to limit potential emissions of fugitive PM/PM_{10} to 5.0 TPY.}

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

Subsection A. Emissions Unit 001

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
001	Five flake dryers with two RTOs

This emissions unit consists of the emission points for each of two identical RTOs (operated in parallel) used to control emissions from five flake dryers (horizontal, cylindrical rotary drum-type). During normal operations, the dryers utilize heat from the exhaust gas of the thermal oil system (EU 011), and are also heated by suspension-type burners that combust wood residuals. The suspension-type burners are designed to burn processed wood fuel. The wood fuel is introduced tangentially to the burners, creating a cyclonic flow pattern, and thereby promoting combustion efficiency. Each suspension-type burner has a maximum heat input of 40 MMBtu/hr. Each of the dryers also has a dedicated natural gas burner rated at 40 MMBtu/hr which can be used to supplement the heat supplied by the wood-fired suspension burner. Each dryer is equipped with multiclones ahead of its connection to the RTOs at a pressure equalization chamber. This emissions unit is subject to the requirements for Prevention of Significant Deterioration (PSD), Permit No. PSD-FL-282A and PSD-FL-282 B, pursuant to Rule 62-212.400(5), F.A.C., for PM/PM_{10}, NOx, CO and VOC, and the state rules as indicated in this permit. The emission limit for VOC is also representative of the requirements of the case-by-case MACT determination required for this project. This emissions unit is subject to 40 CFR 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, adopted and incorporated by reference in Rule 62-204.800, F.A.C. and the CAM requirements of 40 CFR 64 for PM and VOC.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The processing rate from all five dryers shall be limited to 693,272 oven dried tons of flake per 12-month rolling total. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Permit 0770010-002-AC]

A.2. Permitted Capacity. The maximum allowable heat input rate is as follows:

EU No.	MMBtu/hr Heat Input	Fuel Type
001 Each Dryer	40 MMBtu/hr based on monthly average	wood waste/natural gas
001 Each RTO	32 MMBtu/hr based on monthly average	natural gas only

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE) and 62-213.440, F.A.C.; and, Permit No(s). 0770010-001-AC/PSD-FL-282 and 0770010-011-AC/PSD-FL-282B]

A.3. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0770010-002-AC]

A.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Control Technology

A.5. Control Technology: Emissions from the dryers shall be controlled with multiclones and two regenerative thermal oxidizers (RTOs). The RTOs shall be fired exclusively from natural gas, and heat input for each RTO shall be limited to 32 MMBtu/hr, based on a monthly average. In no case shall any dryer operate without its emissions directed to an RTO. Emissions from no more than three dryers shall be directed to any one RTO. Both RTOs shall be operated to control emissions when four or five dryers are operating. When either or both RTOs are taken offline for bakeouts, washouts or other maintenance activities, the number of operating dryers shall be reduced to comply with this paragraph. The 3-hour block average firebox temperature for each RTO must be maintained above the minimum firebox temperature established during the performance test conducted in accordance with 40 CFR 63.2262 that demonstrates compliance with both NESHAP subpart DDDD for THC and BACT for VOC. The set point of each RTO shall be maintained to ensure that the 3-hour block average firebox temperature is maintained above the minimum firebox

temperature established during the performance test. [Rules 62-4.070(3), 62-204.800(11)(b), and 62-212.400, F.A.C., BACT and case-by-case MACT, and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. The table does not supersede any of the terms or conditions of this permit.}

A.6. Emissions Limited: Emissions from both RTOs combined shall not exceed the following limits for the listed pollutants. These limits are based on five dryers operating at capacity with exhaust directed to two RTOs. During periods of operation with less than five dryers, allowable emissions for PM, PM_{10}, NOx, CO and VOC shall be the limits below multiplied by the number of operating dryers divided by five. In no case shall emissions from any one RTO exceed 60 percent of the limits below:

POLLUTANT	EMISSION LIMIT	AVERAGING TIME	BASIS
PM/PM_{10}	42.7 lb/hour	3 hours[1]	BACT
NOx	75.8 lb/hour[2]	3 hours[1]	BACT
CO	42.4 lb/hour	3 hours[1]	BACT
VOC	79.7 lb/hour[3]	3 hours[1]	BACT
VE	10% opacity	6 minutes[4]	BACT

[1] The averaging times for these pollutants correspond to the required length of sampling for the emission tests.
[2] Reported as pounds of NO_2 per hour.
[3] Reported as pounds of carbon per hour.
[4] This averaging time represents the minimum averaging time per EPA Method 9. Opacity is limited to 20% when the RTOs are offline for routine maintenance.

[Rules 62-4.070(3), 62-204.800(11)(b), 62-212.400(12) - (Source Obligation**),** and 62-212.400, F.A.C., BACT and case-by-case MACT, and Permit 0770010-002-AC]
{Permitting Note: These emission limits effectively limit annual emissions to: PM/PM_{10}, 187.0; NO_x, 332.0; CO, 185.9; and VOC, 349.1 TPY. Emission limits for this emission unit include the emissions from the thermal oil system (EU 011) during normal operating conditions. Total potential emissions of SO_2 for this emissions unit and emission unit 011 from firing wood are estimated to be 33.6 TPY. Emissions of SO_2 are not limited by this permit.}

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.7. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

A.8. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

A.9. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C. and Permit No. 0770010-002-AC/PSD-282A]

Test Methods and Procedures

A.10. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5B	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
7 or 7E[1]	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources (1 hour)
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
25A[2]	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

[1] Results shall be reported as pounds of NO_2 per hour.
[2] Results shall be reported as pounds of carbon per hour.

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-297.310(7) and 62-297.401, F.A.C., and Permit 0770010-002-AC]

A.11. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.12. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each RTO shall be tested to demonstrate compliance with the emissions standards. [Rule 62-297.310(7), F.A.C. and Permit No. 0770010-002-AC]

Recordkeeping and Reporting Requirements

A.13. Reporting Requirements. See Subsection G. Common Conditions and Appendix RR, Facility-Wide Reporting Requirements, for reporting requirements.

A.14. Records of Process Rate Required: The owner or operator shall make and maintain records of the processing rates of the dryers, in units of oven dried tons of flake per month and tons per consecutive 12-month period, to demonstrate compliance. Records in units of tons per consecutive 12-month period shall be made from monthly records of process rates for the past 12 months, and shall be completed no later than the 10th day of each month. [Rule 62-4.070(3), F.A.C., and Permit 0770010-002-AC].

A.15. Records of Operation for Dryers: The owner or operator shall make and maintain daily records of wood fuel consumption, daily records of the hours of operation of the dryers, and monthly records of the natural gas consumption. Using these records and current fuel heat values, the owner or operator shall calculate the monthly average heat input for each dryer in units of million Btu/hr, to demonstrate compliance. The owner or operator shall determine the current heat value for the wood fuel no less than annually. The owner or operator may rely on natural gas heat values provided by the gas supplier. The current natural gas heat value shall be updated no less than quarterly. [Rule 62-4.070(3), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

Other Requirements

A.16. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite

Wood Products. The facility has chosen to demonstrate compliance with the applicable requirements of this subpart by the add-on control system compliance options and a continuous monitoring system. The facility must be in compliance with the applicable requirements of this subpart and all applicable general provisions. [Rule 62-213.440, F.A.C., and Appendix NESHAP, subpart DDDD & subpart A]

A.17. This emissions unit is also subject to conditions contained in **Subsection G. Common Conditions.**

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Panel press with one RTO or TCO/RCO

The emissions unit consists of the emission point for the thermal catalytic oxidizer (TCO)used to control emissions from the panel press for a mat of wood flakes, resin and wax. The only difference between an RTO and a TCO/RCO is that in a TCO/RCO a portion of the heat retention media is replaced with a precious metal catalyst to allow operation at lower temperatures. The owner or operator may, during the term of this permit and without need for modification of this permit, elect to replace the RTO with a thermal or regenerative catalytic oxidizer (TCO/RCO). Where this subsection of this permit refers to an RTO, it shall also mean a TCO/RCO. The press is indirectly heated by the thermal oil system (EU 011). This emission unit is subject to the requirements for Prevention of Significant Deterioration (PSD) pursuant to Rule 62-212.400, F.A.C., for PM/PM_{10}, NOx, CO, and VOC, and the state rules as indicated in this permit. The emission limit for VOC is also representative of the requirements of the case-by-case MACT determination required for this project. This emission unit is subject to 40 CFR 63 subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, adopted and incorporated by reference in Rule 62-204.800, F.A.C., and CAM requirements for VOC

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

EU No.	MMBtu/hr Heat Input	Fuel Type
002 RTO	16 MMBtu/hr, based on a monthly average	natural gas only

[Rules 62-4.070(3), 62-4.160(2), 62-204.800, 62-210.200(PTE), and 62-212.400, F.A.C.; and, Permit No. 0770010-002-AC/PSD-FL-282A.]

B.2. Permitted Capacity. Production of oriented strandboard shall be limited to 600 million square feet on a 3/8-inch basis, per consecutive 12-month period. Records of production shall be made and maintained at the facility sufficient to demonstrate compliance with this limitation. [Rules 62-4.070(3), 62.4-160(2), 62-204.800, 62-210.200(PTE), and 62-212.400(12) – (Source Obligation), F.A.C.; and, Permit No. 0770010-002-AC/PSD-FL-282A.]

B.3. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0770010-002-AC/PSD-FL-282A]

B.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Control Technology

B.5. Emissions from the panel press shall be controlled with an RTO and/or a TCO/RCO. The owner or operator may, during the term of this permit and without need for modification of this permit, elect to replace the RTO with a TCO/RCO. Where this subsection of this permit refers to an RTO, it shall also mean a TCO/RCO when the RTO is equipped with a catalyst. In no case shall the press operate without its emissions directed to the RTO. When the RTO is taken offline for bakeouts, washouts or other maintenance activities, the press shall not be operated. The 3-hour block average firebox temperature for the RTO must be maintained above the minimum firebox temperature established during the performance test conducted in accordance with 40 CFR 63.2262 that demonstrates compliance with both NESHAP subpart DDDD for THC and BACT for VOC. The setpoint of the RTO shall be maintained to ensure that the three-hour block average firebox temperature is maintained above the minimum firebox temperature established during the performance test.

[Rules 62-4.070(3), 62-204.800(11)(b), and 62-212.400, F.A.C., BACT and case-by-case MACT, Table 2 & 7 to 40 CFR 63 subpart DDDD; and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.6. Emissions Limited: Emissions from the RTO shall not exceed the following limits for the listed pollutants. These limits are based on the panel press operating at capacity.

POLLUTANT	EMISSION LIMIT	AVERAGING TIME	BASIS
PM/PM_{10}	3.6 lb/hour	3 hours[1]	BACT
NOx	13.5 lb/hour[2]	3 hours[1]	BACT
CO	9.2 lb/hour	3 hours[1]	BACT
VOC	12.6 lb/hour[3]	3 hours[1]	BACT
VE	10% opacity	6 minutes[4]	BACT

[1] The averaging times for these pollutants correspond to the required length of sampling for the subsequent emission tests.
[2] Reported as pounds of NO_2 per hour.
[3] Reported as pounds of carbon per hour.
[4] This averaging time represents the minimum averaging time per EPA Method 9. Opacity is limited to 20% when the RTO is offline for routine maintenance.

[Rules 62-4.070(3), 62-204.800(11)(b), 62-212.400(12) - (Source Obligation), and 62-212.400, F.A.C., BACT and case-by-case MACT, and Permit 0770010-002-AC/PSD-FL-282A]

{Permitting Note: These emission limits effectively limit annual emissions to: PM/PM_{10}, 15.5; NO_x, 59.2; CO, 40.4; and VOC, 55.3 TPY. Potential emissions of SO_2 from the RTO for this emissions unit are negligible and are not limited by this permit.}

Test Methods and Procedures

B.7. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
5B	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
7 or 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources (30 minutes)
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

[1] Results shall be reported as pounds of NO_2 per hour.
[2] Results shall be reported as pounds of carbon per hour

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-297.310 and 62-297.401, F.A.C., Permit 0770010-002-AC/PSD-FL-282A]

B.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.9. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), the EU 002 RTO shall be tested to demonstrate compliance with the emissions standards. [Rule 62-297.310(7), F.A.C. and Permit No. 0770010-002-AC]

B.10. Additional Operating Requirements. The owner or operator shall operate the press with an enclosure that meets the design specifications in §63.2292 or measure the capture efficiency of the capture device for the press using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as appropriate), or use the alternative tracer gas method contained in appendix A to 40 CFR 63 subpart DDDD. The results of the capture efficiency verification have been submitted with the Notification of Compliance Status. [40 CFR 63.2267].

Recordkeeping and Reporting Requirements

B.11. Records of Process Rate Required. The owner or operator shall make and maintain records of the production rate of OSB, in units of million square feet on a 3/8-inch basis per month and million square feet on a 3/8-inch basis per consecutive 12-month period, to demonstrate compliance. Records in units of production per consecutive 12-month period shall be made from monthly records of process rates for the past 12 months, and shall be completed no later than the 10th day of each month. [Rule 62-4.070(3), F.A.C., and Permit 0770010-002-AC]

B.12. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

B.13. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. The facility has chosen to demonstrate compliance with the applicable requirements of this subpart by the add-on control system compliance options and a continuous monitoring system. The facility must be in compliance with the applicable requirements of this subpart and all applicable general provisions. [Rule 62-213.440, F.A.C. and Appendix NESHAP subpart DDDD & subpart A]

B.14. This emissions unit is also subject to conditions contained in **Subsection G. Common Conditions.**

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
003	Screen fines with saw trim transfer baghouse exhaust
004	Saw trim/finishing baghouse exhaust
005	Mat reject/flying saw baghouse exhaust
006	Specialty saw/sander baghouse exhaust
007	Fuel system pneumatics baghouse exhaust
008	Forming bins baghouse exhaust
009	Hammer mill baghouse exhaust

These emissions units consist of emission points for enclosed material handling processes predominantly sawdust and wood residuals. Particulate emissions for most units are controlled by integrated cyclones and baghouses. These emissions units are subject to the requirements for Prevention of Significant Deterioration pursuant to Rule 62-212.400, F.A.C., for PM/PM_{10}, and the state rules as indicated in this permit. Emissions are limited in units of pounds per hour and represent BACT for these sources. Limits are based on BACT determinations of 0.01 grains per dry standard cubic foot (gr/dscf) for EU 006 and 008. The limit for EU 004 and EU 005 is 0.005 gr/dscf. There is greater than 99.99% control efficiency for EU 003, 007 and 009. For purposes of estimating potential emissions from these emissions units, all PM is considered to be PM_{10}. The conditions of this permit effectively limit combined annual emissions from these emissions units to 59.1 TPY of PM/PM_{10}.

Essential Potential to Emit (PTE) Parameters

C.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0770010-002-AC/PSD-FL-282A]

C.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.3. Particulate Matter Emissions Limited: Emissions of PM shall not exceed the following limits. Emissions units 003 through 009 are equipped with a particulate capture and control system consisting of a local exhaust ventilation system ducted to a receiver/baghouse (an integrated cyclone and bag filter).

EMISSIONS UNIT	EMISSION LIMIT
003	2.60 lb/hr
004	1.34 lb/hr
005	2.28 lb/hr
006	2.21 lb/hr
007	0.43 lb/hr
008	1.96 lb/hr
009	2.65 lb/hr

[Rules 62-4.070(3), 62-212.400(12) - (Source Obligation), and 62-212.400, F.A.C., BACT, and Permit 0770010-002-AC]

C.4. Visible Emissions. Visible emissions from each emissions unit shall not exceed 5% opacity. [Rules 62-212.400 and 62-212.400(12), F.A.C. - (Source Obligation), BACT, and Permit 0770010-002-AC]

C.5. Compliance with VE Limit in Lieu of Stack Test: For EU 003 through 009, compliance testing for PM emissions from these EU is waived and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emissions standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A. [Rule 62-297.620(4), F.A.C. and Permit 0770010-002-AC/PSD-FL-282A]

Test Methods and Procedures

C.6. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
5B (if required)	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
9	Visual Determination of the Opacity of Emissions from Stationary Sources (30 minutes)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-4.070(3), 62-212.400, and 62-297.401, F.A.C., BACT and Permit 0770010-002-AC]

C.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

C.8. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), the EUs 003, 004, 005, 006, 007, 008, and 009 shall be tested to demonstrate compliance with the emissions standards. [Rule 62-297.310(7), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

C.9. Daily Visual Observation Required: The owner or operator shall, at least once each day, observe the emission points of EU 003 through 009 while these units are in operation, and log whether visible emissions are observed or not and document corrective actions taken, to help ensure that the visible emissions limit of 5% opacity, is not exceeded. [Rule 62-4.070(3), F.A.C. and Permit 0770010-002-AC/PSD-FL-282A]
{Permitting Note: Method 9 observation is not required for compliance with this condition.}

Recordkeeping and Reporting Requirements

C.10. Records of Daily Visual Observations: The owner or operator shall make and maintain records of the daily visual observations. [Rule 62-4.070 and Permit 0770010-002-AC/PSD-FL-282A]

C.11. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
011	Thermal oil system ESP (bypass stacks)

The thermal oil system is used to provide heat to the press. It consists of two heaters that use oil as a heat transfer medium, with each heater equipped with 40 MMBtu/hr wood fuel (suspension-type) burner and a 30 MMBtu/hr natural gas fuel backup burner. Each heater is controlled independently, and neither is configured to fire wood and natural gas simultaneously. Exhaust from the heaters is directed to an electrostatic precipitator (ESP), and from there normally routed to the dryer system (when this occurs the thermal oil heater is subject to CAM for PM). If the TOH has to abort to the atmosphere before the dryers and RTO due to experiencing a malfunction, or abnormal operation (e.g., start-up or shut down), it will exhaust through the TOH abort stack or the ESP abort stack using only natural gas (other than the short period of time required to make the transition from wood fuel to gas in the event of a sudden shutdown of the dryer). Wood firing is not limited by this permit, but visible emissions shall not exceed 10% when firing wood and bypassing while switching to natural gas.

This emissions unit is subject to the requirements for Prevention of Significant Deterioration pursuant to Rule 62-212.400, F.A.C., for PM/PM_{10}, NOx, CO and VOC, and the state rules as indicated in this permit. This emissions unit is also subject to the requirements of 40 CFR 60 subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60.40c-60.48c) for the periods whenever exhaust is emitted directly to the atmosphere from this emissions unit. Due to fuel usage being limited to natural gas, only the reporting and record keeping requirements of the NSPS apply. This emissions unit is also subject to the requirements for carbonaceous fuel burning equipment of Rule 62-296.410(2)(b), F.A.C., which limits visible emissions and particulate matter while firing wood fuel. Since emissions are routed to the dryer system while wood fuel is fired, and the emission limits for the dryer system are more stringent than the limits of this rule, compliance with the dryer system limits will ensure compliance with this rule.

BACT for this emissions unit is the exclusive firing of natural gas when exhaust is emitted directly to the atmosphere from this emissions unit. Operation of the ESP is required at all times while firing wood fuel; although switching to firing natural gas is required when aborting to atmosphere, such transition may take a small amount of time. Emissions are otherwise not limited. Potential emissions from wood firing are accounted for in the estimate for emissions unit 001. Potential emissions from firing natural gas are:

Pollutant	Tons/Year
PM/PM_{10}	0.5
NOx	26.3
CO	26.3
VOC	1.3
SO_2	0.16

Potential emissions are overestimated by assuming 8,760 hours per year operation while firing natural gas, with no control for PM/PM10 from the ESP due to bypassing at the levels resulting from gas firing. Total potential emissions of SO2 for this emissions unit and emissions unit 001 from firing wood are estimated to be 29.4 TPY. Emissions of SO2 are not limited by this permit.

{Permit Note: Due to the fact that the thermal oil heaters exhaust primarily through the dryers, and according to the Federal Register response to comments on the proposed amendments and clarifications for subpart DDDD dated February 16, 2006,(Federal Register/Vol. 71, No. 32- Pg. 8367 Section III) this response declares that any instances of exhaust that is aborted (from the dryer) through the ESP or bypassing the ESP while burning natural gas will be covered under the Startup, Shutdown, Malfunction (SSM) plan for the dryers covered under PCWP MACT, instead of the subpart DDDDD - Boiler MACT. However, if the indirect heat exhaust stream does not

routinely pass through the direct-fired dryers, then this exhaust stream would be subject to the future Boiler MACT.} {Boiler NESHAP subpart DDDDD, 40 CFR 63 was struck down after promulgation and is being revised by EPA. When the revised regulation is promulgated it may be applicable to this emissions unit and may require a Title V permit revision.}

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum allowable heat input rate is as follows:

EU No.	MMBtu/hr Heat Input	Fuel Type
011 both heaters	80 MMBtu/hr on a monthly average basis	wood waste
011 both heaters	60 MMBtu/hr on a monthly average basis	natural gas

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), F.A.C.; and, Permit No. 0770010-002-AC/PSD-FL-282A.]

D2. Methods of Operation. Each heater shall be fired with wood waste or natural gas. Wood and natural gas shall not be co-fired on the same Thermal Oil Heater. However, each of the two heaters can use either fuel at any given time. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A, 40 CFR 60.48c(g)(2), and 0770010-011-AC/PSD-FL-282B]

D.3. Control Technology: Emissions from the thermal oil system shall be controlled with an Electrostatic Precipitator (ESP) at all times except when firing natural gas. Exhaust from the electrostatic precipitator shall be directed to the dryer system and ultimately to the dryer RTOs (EU 001). Exhaust may be emitted from the emission points when the dryer system is not operating or is otherwise not available, but during such times the thermal oil system shall be fired exclusively with natural gas. If, because of malfunction, exhaust is emitted directly to the atmosphere without ESP control from this emissions unit while the thermal oil system burners are firing wood, the wood fuel feed shall be discontinued as quickly as practicable, and the system shall be switched to firing natural gas, or operation shall be discontinued. In no case shall excess emissions from firing wood exceed the limitations set forth in this section of this permit. [Rules 62-4.070(3), 62-212.400, 62-212.400(12) - (Source Obligation), and 62-296.410(2)(b)., BACT, and Permit 0770010-002-AC/PSD-FL-282A]

{Permit Note: Any instances of exhaust that is aborted (from the dryer) and routed through the ESP or bypassing the ESP while burning natural gas, will be covered under the Startup, Shutdown, Malfunction (SSM) plan for the dryers covered under PCWP MACT, instead of the subpart DDDDD - Boiler MACT. However, if the indirect heat exhaust stream does not routinely pass through the direct-fired dryers, then this exhaust stream may be subject to the future Boiler MACT.}

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

D.4. Visible Emissions. Visible emissions from each emissions point shall not exceed 5% opacity. [Rules 62-212.400(12) - (Source Obligation) and 62-212.400, F.A.C., BACT, and Permit 0770010-002-AC/PSD-FL-282A]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

D.5. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the

Department for longer duration. [Rule 62-210.700(1), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

D.6. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized. [Rule 62-210.700(2), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

D.7. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C. and Permit No. 0770010-002-AC/PSD-FL-282A]

Monitoring of Operations

D.8. CAM Plan. This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Test Methods and Procedures

D.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
5B	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM_{10}.)
7 or 7E	Determination of Nitrogen Oxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources (30 minutes)
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-4.070(3), 62-297.310, and 62-297.401, F.A.C., and Permit 0770010-002-AC/PSD-FL-282A]

D.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

D.11. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), EU 011 shall be tested to demonstrate compliance with the emissions standards for VE. [Rule 62-297.310(7), F.A.C. and Permit No. 0770010-002-AC]

D.12. Compliance Tests Prior To Renewal. Compliance tests shall be performed for EU 011 once every 5 years. The tests shall occur prior to obtaining a renewed operating permit to demonstrate compliance with the emission limits for PM/PM10, NO_x, CO, and VOC. [Rules 62-210.300(2)(a) and 62-297.310(7)(a), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A]

Recordkeeping and Reporting Requirements

D.13. Records of Operation. The owner or operator shall maintain monthly records of fuel consumption and hours of operation of the thermal oil system heaters, and shall each month, using these records and current fuel heat values, calculate the average monthly heat input for both heaters in units of million Btu/hr, to

demonstrate compliance with the heat input limit **.** The owner or operator shall determine the current heat value for the wood fuel no less than annually. The owner or operator may rely on natural gas heat values provided by the gas supplier. The current natural gas heat value shall be updated no less than quarterly.

The owner shall also maintain records of operation to show the duration each month that the thermal oil system is operated with exhaust discharged from this emissions unit, and the fuels fired during these periods. [Rule 62-4.070(3), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

D.14. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

D.15. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [Rule 62-213.440, F.A.C.]

40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

FEDERAL NSPS REQUIREMENTS

{Permitting Note: For ease of use, inapplicable paragraphs are not shown. The numbering of the federal rules (dated 1/28/2009) in the following conditions has been preserved for ease of reference to the rules. The term "Administrator" when used in 40 CFR 60 shall mean the Secretary or the Secretary's designee. This emissions unit is subject to the requirements of 40 CFR 60 subpart Dc for the periods whenever exhaust is emitted directly to the atmosphere from this emissions unit. Because fuel usage during these periods is limited to natural gas, only the reporting and record keeping requirements of the NSPS apply.}

APPLICABILITY AND DEFINITIONS

D.16. Pursuant to 40 CFR 60.40c Applicability and Delegation of Authority:

(a) The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

D.17. Pursuant to 40 CFR 60.41c Definitions:

{Permitting Note: Definitions not applicable to this project have been omitted for brevity.}

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum

(LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see § 60.17), or (3) a mixture of hydrocarbons that maintains a gaseous state at ISO conditions. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 34 and 43 megajoules (MJ) per dry standard cubic meter (910 and 1,150 Btu per dry standard cubic foot).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or heats any heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

D.18. <u>Pursuant to 60.48c Reporting and Record Keeping Requirements</u>:

(a) Completed.

(b) – (f) N.A.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) N/A.

(h)N/A.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years *following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

**{Permitting Note: The only fuel authorized by this permit while emissions unit 011 is subject to the NSPS requirements is natural gas. Records must be maintained for five years pursuant to the requirements for Title V facilities.}*

<u>40 CFR 60, Subpart A - General Provisions Requirements</u>

{Permitting Note: For ease of use, inapplicable paragraphs are not shown. The numbering of the original rules in the following conditions has been preserved for ease of reference to the rules. The term "Administrator" when used in 40 CFR 60 shall mean the Secretary or the Secretary's designee.}

D.19. <u>Pursuant to 40 CFR 60.1 Applicability</u>:

(a) Except as provided in 40 CFR 60 subparts B and C, the provisions of this part apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.

(b) Any new or revised standard of performance promulgated pursuant to section 111(b) of the Act shall apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of such new

or revised standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.

(c) In addition to complying with the provisions of this part, the owner or operator of an affected facility may be required to obtain an operating permit issued to stationary sources by an authorized State air pollution control agency or by the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Title V of the Clean Air Act (CAA) as amended November 15, 1990 (42 U.S.C. 7661). For more information about obtaining an operating permit see part 70 of this chapter.

D.20. <u>Pursuant to 40 CFR 60.7 Notification And Record Keeping</u>:

(a) Any owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:

(1) Completed.

(2) [Reserved]

(3) Completed.

(4) A notification of <u>any physical or operational change</u> to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

(b) The owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

(f) The owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records, except as follows:

(1) N/A.

(2) N/A.

(3) The Administrator or delegated authority, upon notification to the source, may require the owner or operator to maintain all measurements as required by paragraph (f) of this section, if the Administrator or the delegated authority determines these records are required to more accurately assess the compliance status of the affected source.

(g) If notification substantially similar to that in 40 CFR 60.7(a) is required by any other State or local agency, sending the Administrator a copy of that notification will satisfy the requirements of 40 CFR 60.7(a).

(h) Individual subparts of this part may include specific provisions which clarify or make inapplicable the provisions set forth in this section.

D.21. <u>Pursuant to 40 CFR 60.11 Compliance With Standards And Maintenance Requirements</u>:

(d) At all times, including periods of startup, shutdown, and malfunction, owners and operators 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 Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(f) Special provisions set forth under an applicable subpart of 40 CFR 60 shall supersede any conflicting provisions of paragraphs (a) through (e) of 40 CFR 60.11.

D.22. <u>Pursuant to 40 CFR 60.12 Circumvention</u>:

No owner or operator subject to the provisions of 40 CFR 60.12 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

D.23. <u>Pursuant to 40 CFR 60.14 Modification</u>:

(a) Except as provided under 40 CFR 60.14(e) and 40 CFR 60.14(f), any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act. Upon modification, an existing facility shall become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere.

(b) Emission rate shall be expressed as kg/hr (lbs./hour) of any pollutant discharged into the atmosphere for which a standard is applicable. The Administrator shall use the following to determine emission rate:

(1) Emission factors as specified in the latest issue of "Compilation of Air Pollutant Emission Factors", EPA Publication No. AP-42, or other emission factors determined by the Administrator to be superior to AP-42 emission factors, in cases where utilization of emission factors demonstrates that the emission level resulting from the physical or operational change will either clearly increase or clearly not increase.

(2) Material balances, continuous monitor data, or manual emission tests in cases where utilization of emission factors as referenced in 40 CFR 60.14(b)(1) does not demonstrate to the Administrator's satisfaction whether the emission level resulting from the physical or operational change will either clearly increase or clearly not increase, or where an owner or operator demonstrates to the Administrator's satisfaction that there are reasonable grounds to dispute the result obtained by the Administrator utilizing emission factors as referenced in 40 CFR 60.14(b)(1) . When the emission rate is based on results from manual emission tests or continuous monitoring systems, the procedures specified in appendix C of 40 CFR 60 shall be used to determine whether an increase in emission rate has occurred. Tests shall be conducted under such conditions as the Administrator shall specify to the owner or operator based on representative performance of the facility. At least three valid test runs must be conducted before and at least three after the physical or operational change. All operating parameters which may affect emissions must be held constant to the maximum feasible degree for all test runs.

(c) The addition of an affected facility to a stationary source as an expansion to that source or as a replacement for an existing facility shall not by itself bring within the applicability of this part any other facility within that source.

(d) [Reserved]

(e) The following shall not, by themselves, be considered modifications under this part:

(1) Maintenance, repair, and replacement which the Administrator determines to be routine for a source category, subject to the provisions of 40 CFR 60.14(c) and 40 CFR 60.15.

(2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility.

(3) An increase in the hours of operation.

(4) Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type, as provided by 40 CFR 60.1, the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications as amended prior to the change. Conversion to coal required for energy considerations, as specified in section 111(a)(8) of the Act, shall not be considered a modification.

(5) The addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or is replaced by a system which the Administrator determines to be less environmentally beneficial.

(6) The relocation or change in ownership of an existing facility.

(f) Special provisions set forth under an applicable subpart of this part shall supersede any conflicting provisions of this section.

(g) Within 180 days of the completion of any physical or operational change subject to the control measures specified in 40 CFR 60.14(a), compliance with all applicable standards must be achieved.

(h) No physical change, or change in the method of operation, at an existing electric utility steam generating unit shall be treated as a modification for purposes of this section provided that such change does not increase the maximum hourly emissions of any pollutant regulated under this section above the maximum hourly emissions achievable at that unit during the 5 years prior to the change.

D.24. <u>Pursuant to 40 CFR 60.19 General notification and reporting requirements</u>:

(a) For the purposes of 40 CFR 60, time periods specified in days shall be measured in calendar days, even if the word "calendar" is absent, unless otherwise specified in an applicable requirement.

(b) For the purposes of this part, if an explicit postmark deadline is not specified in an applicable requirement for the submittal of a notification, application, report, or other written communication to the Administrator, the owner or operator shall postmark the submittal on or before the number of days specified in the applicable requirement. For example, if a notification must be submitted 15 days before a particular event is scheduled to take place, the notification shall be postmarked on or before 15 days preceding the event; likewise, if a notification must be submitted 15 days after a particular event takes place, the notification shall be delivered or postmarked on or before 15 days following the end of the event. The use of reliable non-Government mail carriers that provide indications of verifiable delivery of information required to be submitted to the Administrator, similar to the postmark provided by the U.S. Postal Service, or alternative means of delivery, including the use of electronic media, agreed to by the permitting authority, is acceptable.

(c) Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

(d) If an owner or operator of an affected facility in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such facility under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. The allowance in the previous sentence applies in each State beginning 1 year after the affected facility is required to be in compliance with the applicable subpart in 40 CFR 60. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

(e) If an owner or operator supervises one or more stationary sources affected by standards set under this part and standards set under part 61, part 63, or both such parts of this chapter, he/she may arrange by mutual agreement between the owner or operator and the Administrator (or the State with an approved permit program) a common schedule on which periodic reports required by each applicable standard shall be submitted throughout the year. The allowance in the previous sentence applies in each State beginning 1 year after the stationary source is required to be in compliance with the applicable subpart in this part, or 1 year after the stationary source is required to be in compliance with the applicable 40 CFR part 61 or part 63 of this chapter standard, whichever is latest. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

(f)(1)(i) Until an adjustment of a time period or postmark deadline has been approved by the Administrator under paragraphs (f)(2) and (f)(3) of this section, the owner or operator of an affected facility remains strictly subject to the requirements of this part.

(ii) An owner or operator shall request the adjustment provided for in paragraphs (f)(2) and (f)(3) of this section each time he or she wishes to change an applicable time period or postmark deadline specified in 40 CFR 60.

(2) Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. An owner or operator who wishes to request a change in a time period or postmark deadline for a particular requirement shall request the adjustment in writing as soon as practicable before the subject activity is required to take place. The owner or operator shall include in the request whatever information he or she considers useful to convince the Administrator that an adjustment is warranted.

(3) If, in the Administrator's judgment, an owner or operator's request for an adjustment to a particular time period or postmark deadline is warranted, the Administrator will approve the adjustment. The Administrator will notify the owner or operator in writing of approval or disapproval of the request for an adjustment within 15 calendar days of receiving sufficient information to evaluate the request.

(4) If the Administrator is unable to meet a specified deadline, he or she will notify the owner or operator of any significant delay and inform the owner or operator of the amended schedule.

Subsection E. Emissions Unit 013

The specific conditions in this section apply to the following emissions unit(s):

EU No.	Brief Description
013	Overlay Process

The overlay process applies an overlay on a board. This product is manufactured by side-streaming a portion of the OSB boards or other board substrates from off-site sources onto the overlay line, rolling coating adhesive onto the boards and laminating an overlay onto the boards. The overlay process operates in parallel to other finishing operations. VOC and HAP emissions result from the adhesive used to attach the overlay.

The overlay line is subject to 40 CFR subpart QQQQ—National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products because it is a source where surface coating is done in laminating of a 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, [40 CFR 63.4681] and, it is a new affected source that will be using more than 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). [40 CFR 63.4681(b)] The Hosford OSB facility is an existing major source of HAP emissions, currently emitting more than 25 T HAP/yr.

The applicable wood building products source category is subcategory (a)(4) *Other interior panels*, Panels that are sold for uses other than interior wall paneling, such as coated particleboard, hardboard, and perforated panels. [40 CFR 63.4681(a)(4)]

Permittee has chosen to demonstrate compliance with applicable emission limits via the *Compliant material option* specified in 40 CFR 63.4691(a). Permittee must include all coatings, thinners, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR 63.4690. Permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit(s) in §63.4690, and that each thinner and each cleaning material used contains no organic HAP. [40 CFR 63.4691]

Essential Potential to Emit (PTE) Parameters

E.1. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0770010-005-AC]

E.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. The table does not supersede any of the terms or conditions of this permit.}

E.3. Permittee has chosen to demonstrate compliance with applicable emission limits via the *Compliant material option* specified in 40 CFR 63.4691(a).[40 CFR 63.4691] [Rules 62-204.800(11)(b)73, 62-4.070, and 62-212.300(1)(e), F.A.C., 40 CFR 63 subpart QQQQ, and permittee request.]

Recordkeeping and Reporting Requirements

E.4. Emissions compliance will be demonstrated by record keeping. These recordkeeping requirements are in addition to those of 40 CFR 63 subpart QQQQ. The owner or operator shall maintain records to document the monthly and the consecutive twelve-month rolling totals of panels processed, adhesive used and VOC and HAP in the adhesive to demonstrate compliance. The shipping receipt and material data sheets for the

adhesives showing the amount, density, VOC and HAP content shall be part of the record keeping. The entire HAP and VOC content of the adhesive used is considered emitted to the air. Records in "number of panels" and units of tons of VOC and HAP emitted per consecutive 12-month period shall be made from monthly records for the past 12 months, and shall be completed no later than the 10th day of each month. Such records shall be available to the Department and retained for five years. The VOC and HAP emissions shall be included in the Annual Operating Report for the facility. [Rules 62-4.070, 62-212.300(1)(e), F.A.C.]

E.5. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

E.6. Changes between compliance options for the coating operation must be documented as required by §63.4730(c), and must be reported in the next semiannual compliance report required in §63.4720. [40 CFR 63.4691] Because such changes may increase emissions, permittee must request a determination from the Department in case a construction permit is needed prior to the changes. [Rules 62-204.800(11)(b)73, 62-4.070, 62-210.300(1)(a), and 62-212.300(1)(e), F.A.C., and 40 CFR 63 subpart QQQQ]

E.7. Federal Rule Requirements. In addition to the specific conditions listed above, this emissions unit is also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart QQQQ – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products. [Rule 62-213.440, F.A.C.]

Subsection F. Emissions Unit 014

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
014	Miscellaneous Coating Operations

Several types of miscellaneous coating operations occur inside the manufacturing building. Coatings are applied in a dedicated booth with filter controls in line with the production process. The booth exhausts through a mat filter within the building. The painting of edge seal coating on the edges of the panels occurs inside the paint booth. Coatings are also applied manually on a batch basis outside the booth. These operations include painting the stencil logo on the outside of panels, painting nail/guide lines and ultra seal coating on certain product lines, and painting trademark grade stamps using either the rollers or the ink jet printer.

Emissions unit 014 was previously permitted as part of EU 010 (fugitives), which were an unregulated emissions unit. However, the stenciling, edge sealing, ultra sealing, guide/nail lines, and grade stamps are now regulated as Group 1 Miscellaneous Coating Operations under 40 CFR 63 subpart DDDD.

Pursuant to 40 CFR 63.2292, *Group 1 miscellaneous coating operations* means application of edge seals, nail lines, logo (or other information) paint, shelving edge fillers, trademark/grade stamp 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. Group 1 miscellaneous coating operations also include application of synthetic patches to plywood at new affected sources. Group 1 Miscellaneous coatings are subject to work practice requirements of 40 CFR 63 subpart DDDD-National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products adopted and incorporated by reference in Rule 62-204.800, F.A.C.

Pursuant to 40 CFR 63.2292, *miscellaneous coating operations* means application of any of the following to plywood or composite wood products: edge seals, moisture sealants, anti-skid coatings, company logos, trademark or grade stamps, nail lines, synthetic patches, wood patches, wood putty, concrete forming oils, glues for veneer composing, and shelving edge fillers. Miscellaneous coating operations also include the application of primer to oriented strandboard siding that occurs at the same site as oriented strandboard manufacture and application of asphalt, clay slurry, or titanium dioxide coatings to fiberboard at the same site of fiberboard manufacture.

Essential Potential to Emit (PTE) Parameters

F.1. Permitted Capacity. Production of oriented strandboard shall be limited to 600 million square feet on a 3/8-inch basis, per consecutive 12-month period. Records of production shall be made and maintained at the facility sufficient to demonstrate compliance with this limitation. [Rules 62-4.070(3), 62-212.400(12) - (Source Obligation), and 62-210.200(PTE), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A]

F.2. Hours of Operation. This emissions unit may operate continuously (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C., Permit No. 0770010-002-AC/PSD-FL-282A]

F.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

F.4. Work Practice Requirements (for Group 1 Miscellaneous Coatings only):

a. For Group 1 Miscellaneous Coating Operations, the owner or operator shall use only non-HAP coatings. Non-HAP coating means a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. [Table 3 of 40 CFR 63 subpart DDDD, 63.2241 (a) and 63.2292; Application No. 0770010-010-AC]

b. As provided in 40 CFR 63.6(g), the EPA, may choose to grant the owner or operator permission to use an alternative to the work practice requirements. [40 CFR 63.2241(b)]

c. The Group 1 Miscellaneous Coating Operations must comply with the work practice requirements upon initial startup. The owner or operator shall be in compliance the work practice requirements at all times, except during times when the process unit(s) are not operating. [40 CFR 63.2233(a)(2) and 63.2250(a)]

Monitoring, Recordkeeping and Reporting Requirements

F.5. The owner or operator shall demonstrate continuous compliance by continuing to use non-HAP coatings and keeping records showing that he/she is using non-HAP coatings for Group 1 Miscellaneous Coating Operations. [40 CFR 63.2271 (a), and Table 8 to subpart DDDD of part 63].

F.6. The following records must also be kept:

a. A copy of each notification and report that was submitted to comply with subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in §63.10(b)(2)(xiv).

b. Records required in Table 8 to subpart DDDD to show continuous compliance with each work practice requirement.

[40 CFR 63.2282(a) & (b)]

F.7. The records must be in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). [40 CFR 63.2283 (a)]

F.8. As specified in 40 CFR 63.10(b)(1), the owner or operator shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.2283 (b)]

F.9. The owner or operator shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The owner or operator can keep the records offsite for the remaining 3 years. [40 CFR 63.2283 (c)]

F.10. The owner or operator shall report each instance in which he/she did not meet the work practice requirements for Group 1 Miscellaneous Coating Operations. [40 CFR 63.7721 (b)]

F.11. Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), each compliance report must be submitted according to the following:

a. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

b. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively.

c. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), the first and subsequent compliance reports may

be submitted according to the dates the permitting authority has established instead of according to the dates above.

[40 CFR 63.2281(b)]

F.12. The compliance report must contain the following information:

a. Company name and address.

b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

c. Date of report and beginning and ending dates of the reporting period.

d. If there are no deviations from the work practice requirements in Table 8 of 40 CFR 63 subpart DDDD, a statement that there were no deviations from the work practice requirements during the reporting period.

[40 CFR 63.2281(c)]

F.13. For each deviation from the work practice requirement that occurred, in addition to the requirements stated above, the compliance report shall also contain the following information:

a. The total operating time of each affected source during the reporting period.

b. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.2281 (d)]

F.14. The owner or operator shall report all deviations in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A). If the owner or operator submits a compliance report pursuant to the requirements of this subsection along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.2281 (g)]

F.15. Reporting Schedule. The following reports and notifications shall be submitted to the Compliance Authority:

Report	Reporting Deadline	Related Condition(s)
Compliance Report	semiannual postmarked by Jan 1 and July 31	F.7., F.8., F.9., and F.10.

[Rule 62-213.440, F.A.C.]

F.16. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

F.17. Federal Rule Requirements. In addition to the specific conditions listed above, The Group 1 Miscellaneous Coating operations of this emissions unit are also subject to the applicable requirements contained in 40 CFR 63, Subpart A – General Provisions and 40 CFR 63 Subpart DDDD – National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products. [Rule 62-213.440, F.A.C.]

Subsection G. Common Conditions

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
001	Five flake dryers with two RTOs
002	Panel press with one RTO or TCO/RCO

The following conditions apply to the NESHAPs emissions units listed above:

G.1. PCWP MACT Total HAP Limit: The owner or operator shall use each Regenerative Thermal Oxidizer (RTO), and where this subsection of this permit refers to the Panel Press RTO, it shall also mean a TCO/RCO, to reduce the emissions of Total HAP, measured as THC (as carbon), by 90 percent or shall comply with one of the other compliance options to Subpart DDDD of 40 CFR 63 . The owner or operator may choose to subtract methane from THC as carbon measurements. [40 CFR 63.2240 (b) and Table 1B to subpart DDDD of 40 CFR 63]

G.2. Operating Requirements: The 3-hour block average firebox temperature for each RTO must be maintained above the minimum firebox temperature established during the performance test conducted in accordance with 40 CFR 63.2262 that demonstrates compliance with both NESHAP Subpart DDDD for THC and BACT for VOC. When EU002 is operated as a catalytic oxidizer, the owner or operator shall maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test. The owner or operator shall check the activity level of a representative sample of the catalyst at least every 12 months and take any necessary corrective action to ensure that the catalyst is performing within its design range. [62-204.800(10)(d)2, and 62-212.400, F.A.C., BACT and case-by-case MACT, Table 2 & 7 to 40 CFR 63 subpart DDDD; and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

G.3. Opacity Observations: The permittee shall conduct weekly observations of the opacity from EU 001 and EU002 and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep records onsite and make them available to Department personnel upon request.

The permittee shall conduct daily observations of the opacity from EU 001 and EU002 during off-line maintenance functions and keep a record of these observations. If the permittee detects visible emissions, the permittee must immediately take action to identify and correct the cause of the visible emissions. After implementing the corrective action, the permittee must document that the source complies with the visible emissions requirements. The permittee shall maintain records of the cause of any visible emissions and the corrective action taken. The permittee must keep these records onsite and make them available to Department personnel upon request.

[Rules 62-4.070(3), 62-204.800(11)(b), and 62-212.400, F.A.C., BACT and case-by-case MACT, and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

40 CFR 63 Subpart DDDD – General Requirements

G.4. The owner or operator shall comply with the compliance options and operating requirements of 40 CFR 63 subpart DDDD at all times, except:

a. During periods of process unit or control device startup, shutdown, and malfunction.
b. Prior to the process unit initial startup.
c. The process unit is not operating.

Startup and shutdown periods shall not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)]

G.5. The owner or operator shall always operate and maintain the emissions unit, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.2250(b)]

G.6. The owner or operator has developed and implemented a written Startup, Shutdown and Malfunction Plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3) . The permittee must keep a copy of the most recent approved version of the SSMP at the source's location and retain all previous versions of the SSM plan for five years. Each revision to the SSMP must be reported in the semiannual report required by 63.10(d)(5). [40 CFR 63.2250(c) and §63.6(e)(3)]

40 CFR 63, Subpart DDDD – Initial Compliance Demonstration with the Compliance Options and Operating Requirements

G.7. The owner or operator shall demonstrate initial compliance with the compliance option(s) and operating requirements by conducting performance tests and establish site-specific operating requirements in Table 2 to 40 CFR 63 subpart DDDD according to the requirements in 40 CFR 63.2262 and Table 4 to 40 CFR 63 subpart DDDD. [40 CFR 63.2260(a)]

G.8. The owner or operator shall conduct each performance test according to the requirements in 40 CFR 63.7(e)(1), the requirements in Specific Condition No. G.12. through G.20., and according to the applicable methods specified in Table 4 to 40 CFR 63 subpart DDDD. [40 CFR 63.2262(a)]

G.9. The owner or operator shall not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 63.7(e)(1). The owner or operator shall:
a. Test under representative operating conditions as defined in 40 CFR 63.2292.
b. Describe representative operating conditions in the performance test report for the process and control systems and explain why they are representative.
[40 CFR 63.2262(b)]

G.10. Number of Test Runs. Except for DEP Method 9, the owner or operator shall conduct three separate test runs for each performance test required in this section as specified in 40 CFR 63.7(e)(3). Each test run must last at least 1 hour except for testing of an enclosure conducted using the alternative tracer gas method in appendix A to 40 CFR 63 subpart DDDD, which requires a minimum of three separate runs of at least 20 minutes each. [40 CFR 63.2262(c)]

G.11. Location of Sampling Sites. Except for DEP Method 9, sampling sites shall be located at the inlet and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere. [40 CFR 63.2262(d)]

G.12. Collection of monitoring data. The owner or operator shall collect operating parameter monitoring system or continuous emissions monitoring system (CEMS) data at least every 15 minutes during the entire performance test and determine the parameter or concentration value for the operating requirement during the performance test using the methods specified in 40 CFR 63.2262 (k) through (o). [40 CFR 63.2262(e)]

G.13. Nondetect Data. All nondetect data (40 CFR 63.2292) shall be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbon (THC) emission rates. [40 CFR 63.2262 (g)]

G.14. Calculation of Percent Reduction Across a Control System. To comply with any of the compliance options based on percent reduction across a control system in Table 1B to 40 CFR 63 subpart DDDD, as part of the performance test, the percent reduction shall be calculated using Equation 1:

$$PR = CE \times \frac{ER_{in} - ER_{out}}{ER_{in}} (100) \qquad \text{(Equation 1)}$$

Where:
PR = percent reduction, percent;
CE = capture efficiency, percent (determined for reconstituted wood product presses and board coolers as required in Table 4 to this subpart);
ER_{in} = emission rate of total HAP (calculated as the sum of the emission rates of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde), THC, formaldehyde, or methanol in the inlet vent stream of the control device, pounds per hour;
ER_{out} = emission rate of total HAP (calculated as the sum of the emission rates of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde), THC, formaldehyde, or methanol in the outlet vent stream of the control device, pounds per hour.
[40 CFR 63.2262 (h)]

G.15. Establishing thermal oxidizer operating requirements. The owner or operator shall establish the thermal oxidizer operating parameters according to paragraphs (1) and (2) of this condition.

(1) During the performance test, the owner or operator shall continuously monitor the firebox temperature during each of the required 1-hour test runs. For regenerative thermal oxidizers, the owner or operator may measure the temperature in multiple locations (*e.g.* , one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature. The minimum firebox temperature must then be established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

(2) The owner or operator may establish a different minimum firebox temperature for the thermal oxidizer by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph (1) of this condition that demonstrates compliance with the applicable compliance options.

[40 CRF 63.2262 (k)]

G.16. Establishing catalytic oxidizer operating requirements. The owner or operator shall establish the catalytic oxidizer operating parameters according to paragraphs (1) and (2) of this condition.

(1) During the performance test, the owner or operator must continuously monitor during the required 1-hour test runs either the temperature at the inlet to each catalyst bed or the temperature in the combustion chamber. For regenerative catalytic oxidizers, the owner or operator must calculate the average of the temperature measurements from each catalyst bed inlet or within the combustion chamber prior to reducing the temperature data to 15-minute averages for purposes of establishing your minimum catalytic oxidizer temperature. The minimum catalytic oxidizer temperature must then be established as the average of the three minimum 15-minute temperatures monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

(2) The owner or operator may establish a different minimum catalytic oxidizer temperature by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraphs (1) and (2) of this condition that demonstrates compliance with the applicable compliance options.

G.17. Notification of Compliance Status. The owner or operator shall submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 CFR 63.2280(d). [40 CFR 63.2260 (c)]

Monitoring, Installation, Operation, and Maintenance Requirements

G.18. General Continuous Parameter Monitoring Requirements. The owner or operator shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (1) through (3) of this condition.

(1) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
(2) At all times, the owner or operator shall maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
(3) Record the results of each inspection, calibration, and validation check.

[40 CFR 63.226 (a)]

G.19. Temperature Monitoring. For each temperature monitoring device, the owner or operator shall meet the requirements in paragraphs (1) through (6) of this condition.

(1) Locate the temperature sensor in a position that provides a representative temperature.
(2) Use a temperature sensor with a minimum accuracy of 4 degrees F or 0.75 percent of the temperature value, whichever is larger.
(3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 degrees F.
(4) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, the owner or operator shall 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 degrees F of the process temperature sensor's reading.
(5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
(6) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

[40 CFR 63.2269(b)]

Monitoring and Collecting Data To Demonstrate Continuous Compliance

G.20. The owner or operator shall conduct all monitoring in continuous operation at all times that the process unit is operating, except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). For purposes of calculating data averages, the owner or operator shall not use data recorded during monitoring malfunctions, associated repairs, out-of control periods, or required quality assurance or control activities. The owner or operator shall use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations, constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]

G.21. The owner or operator may not use the following data in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable:

a. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; or

b. Data recorded during periods of startup, shutdown, and malfunction.
The owner or operator shall use all the data collected during all other periods in assessing the operation of the control system.
[40 CFR 63.2270(c)]

G.22. Determine the 3-hour block average of all recorded readings, 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 40 CFR 63.2270 (b) & (c). [40 CFR 63.2270(d)]

G.23. To calculate the data averages for each 3-hour or 24-hour averaging period, the owner or operator 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 40 CFR 63.2270 (b) & (c). [40 CFR 63.2270(f)]

Continuous Compliance Demonstration with the Compliance Options, Operating Requirements, and Work Practice Requirements

G.24. The owner or operator shall demonstrate continuous compliance with the compliance option(s) and operating requirements in 40 CFR 63.2240 by:

a. Collecting and recording the operating parameter (temperature) monitoring system data listed in Table 2 to 40 CFR 63 subpart DDDD for the process unit according to 63.2269(a) & (b) and 63.2270; **AND**
b. Reducing the operating parameter monitoring system data to the specified averages in units of the applicable requirement according to the calculations in 40 CFR 63.2270; **AND**
c. Maintaining the average operating parameter above the minimum established according to 40 CFR 63.2262.

[40 CFR 63.2271(a) and Table 7 to Subpart DDDD of 40 CFR 63]

G.25. The owner or operator shall report each instance in which the unit did not meet the applicable compliance option and operating requirement in Table 7 of 40 CFR 63 subpart DDDD. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (1) and (2) of this condition. These instances are deviations from the compliance options and operating requirements. These deviations must be reported according to the requirements in 40 CFR 63.2281.

(1) Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the owner or operator demonstrates to the Department's satisfaction that the unit was operating in accordance with 40 CFR 63.6(e)(1). The Department 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)]

G.26. Test for Destruction Efficiency Required: An annual test for destruction efficiency shall be conducted simultaneously with annual emission test for VOCs for each RTO, with destruction efficiency given by the following, expressed as a percentage:

$$\frac{\text{VOC inlet (lb/hour)} - \text{VOC outlet (lb/hour)}}{\text{VOC inlet (lb/hour)}}$$

Destruction efficiency shall be reported with the VOC test results.
{Permitting Note: Destruction efficiency is not limited by this permit. These results are reported to provide the Department with information about RTO performance.}
[Rule 62-4.070 (3), F.A.C., and Permit 0770010-002-AC]

Compliance Assurance Monitoring (CAM) Requirements

G.27. These emissions unit are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Notification Requirements

G.28. General Notifications Requirements. The owner or operator shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified. [40 CFR 63.2280(a)]

G.29. Performance Test Notification. The owner or operator shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). [40 CFR 63.2280 (c)]

G.30. Notification of Compliance Status. The owner or operator shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h)(2)(ii).

(1) For each initial compliance demonstration required in Table 5 to 40 CFR 63 subpart DDDD that does not include a performance test, the owner or operator shall submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.
(2) For each initial compliance demonstration required in Table 5 that includes a performance test conducted according to the requirements in Table 4 to 40 CFR 63 subpart DDDD, the owner or operator shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2).

[40 CFR 63.2280(d)]

G.31 Modification or Replacement of Control Unit, and Change of Minimum Temperature. The owner or operator shall notify the Department within 30 days before he/she takes any of the actions specified in paragraph (1) and (2) of this condition.

(1) The owner or operator modifies or replaces the control system for the unit.
(2) The owner or operator changes the continuous monitoring parameter minimum value (temperature) for the control device.

[40 CFR 63.2280(g)]

Recording Requirements

G.32. Records of Operation for RTOs: The owner or operator shall make and maintain monthly records of fuel consumption of the RTOs, and shall each month, using these records and records of operation and current natural gas heat value, calculate the monthly average heat input for each RTO in units of million Btu/hr, to demonstrate compliance with the heat input limit. The owner or operator may rely on natural gas heat values provided by the gas supplier. The current natural gas heat value shall be updated no less than quarterly. [Rule 62-4.070(3), F.A.C., and Permit 0770010-002-AC/PSD-FL-282A and 0770010-011-AC/PSD-FL-282B

G.33. Operational Status Indicators: The isolation damper position shall be recorded when position changes occur. Records of the isolation damper positions shall document when exhaust gases from the dryers are

being directed to the RTOs and the number of dryers and RTOs on line, and shall be used, in conjunction with records of operation of the dryers and RTOs, to demonstrate compliance with the requirement to direct dryer exhaust to an RTO and to direct exhaust from no more than three dryers to any one RTO. [Rules 62-4.070(3), 62-204.800(11)(b), and 62-212.400, F.A.C., BACT and case-by-case MACT and Permit 0770010-002-AC/PSD-FL-282A, and 0770010-011-AC/PSD-FL-282B]

G.34. Recordkeeping. The owner or operator shall keep the records listed in the table below.

1) A copy of each notification and report that the owner or operator has submitted, including all documentation supporting any Initial Notification or Notification of Compliance Status that has submitted, according to the requirements in 40CFR 63.10(b)(2)(xiv).
2) The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
3) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2) (viii).
4) The records required in Table 7 to 40 CFR 63 subpart DDDD to show continuous compliance with each applicable compliance option and operating requirement.
5) CEMS records described in §63.10(b)(2)(vi) through (xi).
6) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
7) Request for alternatives to relative accuracy testing for CEMS as required in §63.8(f)(6)(i).
8) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.
9) Records of annual catalyst activity checks and subsequent corrective actions

• Total HAP emissions in tons shall be recorded (based on emissions factors and production data) and reported annually in the Annual Operating Report.
• Volatile Organic Compounds emissions in tons shall be recorded (based on emissions factors and production data) and reported annually in the Annual Operating Report.

[40 CFR 63.2282 and Rule 62-210.370(3), F.A.C.]

G.35. Records Retention. The records shall be in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). The owner or operator shall:

a. Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, as specified by 40 CFR 63.10(b)(1).
b. Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The owner or operator can keep the records offsite for the remaining 3 years.

[40 CFR 63.2283]

Reporting Requirements

G.36. Compliance Report Submittal. Unless the Department has approved a different schedule for submission of reports under 40 CFR 63.10(a), the owner or operator shall submit the compliance report semiannually by the date specified below:

(1) Each compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(2) Each compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively.
[40 CFR 63.2281 (a)&(b), and Table 9 to subpart DDDD of 40 CFR 63]

G.37. Immediate Startup, Shutdown and Malfunction Report. If the unit had a startup, shutdown and malfunction during the reporting period that is not consistent with SSMP, the owner or operator shall submit the report by:

a. Fax or telephone within two working days after starting actions inconsistent with the plan. The report shall contain the action taken for the event.
b. Letter within seven working days after the end of the event unless the owner or operator has made alternative arrangements with the Department. The report shall contain the information in 40 CFR 63.10 (d)(5)(ii).

[40 CFR 63.2281 (a), and Table 9 to subpart DDDD of 40 CFR 63]

G.38. Compliance Report. The compliance report shall contain:

1) Company name and address
2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
3) Date of report and beginning and ending dates of the reporting period.
4) If the unit had a startup, shutdown, or malfunction during the reporting period and the owner or operator took actions consistent with the SSMP, the compliance report must include the information specified in 40 CFR 63.10(d)(5)(i).
5) A description of control device maintenance performed while the control device was offline and one or more* of the process units controlled by the control device were operating, including the information specified below.
   i. The date and time when the control device was shut down and restarted.
   ii. Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
   iii. N/A.

* In no case shall any dryer or press operate without its emissions directed to an RTO. Emissions from no more than three dryers shall be directed to any one RTO. Both RTOs shall be operated to control emissions when four or five dryers are operating. See Essential PTE Parameters for EU 001.

6) The results of any performance tests conducted during the semiannual reporting period.
7) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.
8) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

[40 CFR 63.2281 (c), F.A.C.]

G.39. For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to 40 CFR 63 subpart DDDD that occurs at an affected source where a CMS is not used to comply with the compliance options, operating requirements, or work practice requirements in this subpart, the compliance report must contain the information in 40 CFR 63.2281 (c)(1) through (6) and paragraphs (1) and (2) of this condition. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

1) The total operating time of the unit during the reporting period.

2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.2281 (d), F.A.C.]

G.40. For each deviation from a compliance option or operating requirement occurring at an affected source where a CMS is being used to comply with the compliance options and operating requirements, the report must also contain the information included in paragraphs (c)(1) through (6) and paragraphs (1) through (11) of this condition . This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

1) The date and time that each malfunction started and stopped.
2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
3) The date, time, and duration that each CMS was out-of-control, including the information in Sec. 63.8(c)(8).
4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance; or during another period.
5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
8) A brief description of the process units.
9) A brief description of the CMS.
10) The date of the latest CMS certification or audit.
11) A description of any changes in CMS, processes, or controls since the last reporting period.

[40 CFR 63.2281 (e), F.A.C.]

G.41. The owner or operator shall report all deviations as defined in PCWP MACT in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A). If the owner or operator submits a compliance report pursuant to specific condition A.40 along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the unit may have to report deviations from permit requirements to the permitting authority. [40 CFR 63.2281 (g)]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix ICE, Requirements for Internal Combustion Engines.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities.
Appendix CAM, Compliance Assurance Monitoring Plan and CAM General Conditions.
Appendix NSPS, Subpart A – General Provisions. (Include for all units that are subject to an NSPS subpart).
Appendix NSPS, Subpart Dc - Small Industrial-Commercial-Institutional Steam Generating Units.
Appendix NESHAP, Subpart A – General Provisions. (Include for all units that are subject to a NESHAP).
Appendix NESHAP, Subpart DDDD - Plywood and Composite Wood Products.
Appendix NESHAP, Subpart QQQQ – Surface Coating of Wood Building Products.
Appendix NESHAP, Subpart ZZZZ –Stationary Reciprocating Internal Combustion Engines.
Federal Register Page 8367 from 2/16/06.