

March 15, 2007

Mr. Charles O. McLendon
Plant Manager
Georgia-Pacific Wood Products, LLC
Dudley Plywood, OSB, Chip-N-Saw Plant
Post Office Box 308
Dudley, North Carolina 2833

Dear Mr. McLendon:

SUBJECT: **Air Quality Permit No. 09268T07**
Facility ID: 07/096/00058
Georgia-Pacific Wood Products, LLC
Dudley, North Carolina
Wayne County
Fee Class: Title V

In accordance with your request for an administrative amendment to the Title V Permit received January 26, 2007, we are forwarding herewith Air Quality Permit No. **09268T07** to Georgia-Pacific Wood Products, LLC, 139 Brewington Road, Dudley, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3 of Part I. **The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.**

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition,
Mr. Charles O. McLendon

March 15, 2007

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conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with **both** the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in **writing** to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of GS 143-215-108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of GS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in GS 143-215.114A and 143-215.114B.

This Air Quality Permit shall be effective from March 15, 2007 until March 31, 2008, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Jenny Sheppard at (919)715-6259.

Sincerely yours,

Donald R. van der Vaart Ph.D, P.E.
Chief

Enclosure

c: Gregg Worley, EPA Region 4
Washington Regional Office
Central Files

Table of Changes to Permit Number 09268T07:

Page Number	Condition Number	Change
Cover	Permit Information	Modified to reflect current permit number, issue and effective date, and associated application information and Ownership/Name change
Pages	Part I, Section 3	Updated General Conditions

Insignificant Activities under 15A NCAC 2Q .0503(8)

Emission Source ID No.	Emission Source Description
IES-SWS1	Swing Saw No. 1
IF-BP	Bark Pile
IF-LSV	Log Soaking Vats
IF-LA	Lathes
IF-LPC	Lily Pad Chipper
IF-VC1 and IF-VC2	Veneer Chippers 66 and 67
IF-SHS1 and IF-SHS2	Shaker Screens 1 and 2
IF-TR	Chip Truck Bin/ Rail Loading
IF-TB1	Chip Truck Bin
IF-TB2	Plytrim Truck Bin
IF-PO	Painting Operations
IF-TK1 and IF-TK2	Resin Tanks Nos. 1 and 2 (10,000 gallons capacity each)
IES-TC	Tops chipper
IES-PCR	Pine chip rail loading operation
IF-BFS	Block flaker saw
IF-SFP	Screen fines pile
IF-DFS	Dry flake storage
IF-FSP	Fire storage pile
IF-FTB	Fines truck bin
IES-PCR	Pine chip rail loading operation
IF-LSSC	Logo stencil surface coating operation
IF-CS1	No. 1 cutoff saw
IF-CS2	No. 2 cutoff saw
IF-BB	Bark bin
IF-SWB	Sawdust bin
IF-PSB	Planer shavings bin
IF-BS	Bark shredder

IF-SC	Small chipper
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State of North Carolina,
Department of Environment,
and Natural Resources

Division of Air Quality



AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
09268T07	09268T06	March 15, 2007	March 31, 2008

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 2D and 2Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 2Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: **Georgia-Pacific Wood Products, LLC**
Dudley Plywood/OSB/CNS Plant
Facility ID: **07/096/00058**

Facility Site Location: **139 Brewington Road**
City, County, State, Zip: **Dudley, Wayne County, North Carolina, 28333**

Mailing Address: **Post Office Box 308**
City, State, Zip: **Dudley, North Carolina 28333**

Application Number: **9600058.07A**
Complete Application Date: **December 4, 2007**

Primary SIC Code: **2436**
Division of Air Quality,
Regional Office Address: **Washington Regional Office**
943 Washington Square Mall
Washington, North Carolina 27889

Permit issued this the 15th day of March, 2007

Donald R. van der Vaart Ph.D, P.E., Chief, Air Permits Section
By Authority of the Environmental Management Commission

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PART I

The Division of Air Quality (DAQ), the United States Environmental Protection Agency (EPA), and citizens as defined under the Federal Clean Air Act have the authority to enforce the terms, conditions, and limitations contained in Part I of this permit unless otherwise specified.

Under Title 15A NCAC 2Q, the operation of emission source(s) and associated air pollution control device(s) and appurtenances listed in Part I of this permit is based on plans, specifications, operating parameters, and other information as submitted in the Air Quality Permit Application.

SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
PLYWOOD			
Fugitive Particulate Emission Sources including:			
F-DBPWOSB	Debarker	n/a	n/a
F-DS, F-SS	Deck saws, slasher saws	n/a	n/a
F-BFH	Boiler fuel house	n/a	n/a
F-BH	Bark hog	n/a	n/a
F-PR	Paved/unpaved roads	n/a	n/a
Glue Line - PLYWOOD			
F-GL	Glue line	n/a	n/a
Conveying, sawing, trimming operations including - PLYWOOD:			
BACT ES-CS1	Shaker screen 1 chip conveying system	CD-C17	one simple cyclone (60 inches in diameter)
BACT ES-CS2	Shaker screen 2 chip conveying system at truck bin and chip rail loading	CD-C5, CD-C5A	two simple cyclones (72 inches in diameter and 96 inches in diameter, respectively)
BACT ES-CS3	Plywood sawing and trimming operation	CD-BH1, CD-C1, CD-8A	one bagfilter (4,007 square feet of filter area) installed on two simple cyclones (156 inches and 56 inches in diameter, respectively)
BACT ES-CS4	Pressing, sawing, conveying transfer system	CD-BH8, CD-C8	one bagfilter (407 square feet of filter area) in turn installed on one simple cyclone (60 inches in diameter)
Veneer dryers 1, 2, 3, 4 - PLYWOOD			
BACT,	Four steam heated veneer dryers	CD-VD	one four chamber natural-gas fired

MACT ES-VD1, ES-VD2, ES-VD3, ES-VD4	(50,000 square feet per hour combined drying capacity (3/8 inch basis))		Regenerative Thermal Oxidizer (11.0 million Btu per hour heat input capacity)
Plywood Presses - PLYWOOD			
BACT, MACT F-VP1, F-VP2	Two plywood presses	n/a	n/a
Sanding Operations - PLYWOOD			
BACT ES-BS	Plywood sanding operations (big sander)	CD-BH4, CD-C4	one bagfilter (3,253 square feet of filter area) installed on a simple cyclone (144 inches in diameter)
BACT ES-TGS	Tongue and groove sander	CD-BH3, CD-C3	one bagfilter (3,253 square feet of filter area) installed on a simple cyclone (144 inches in diameter)
MACT ES-DPL	Dry-Ply line	n/a	n/a
MACT F-ES	Edge seal	n/a	n/a
Wood-fired boiler - PLYWOOD			
BACT ES-B1	Woodwaste/bark-fired boiler (254 million Btu per hour heat input rate) with a propane/natural gas-fired sanderdust burner	CD-SC, CD-MC	one venturi scrubber (1,200 gallons per minute water injection rate) installed on a multicyclone (200 nine-inch tubes)
OSB			
BACT ES-RD1, ES-RD2, ES-RD3	Three sanderdust/woodwaste-fired rotary dryers with a propane/natural gas pilot	CD-D1, CD-D2, and CD-D3; CD-ESP	three cyclones (144 inches in diameter each) each installed on a dryer and in series with an electrostatic precipitator with prequench (39,036 square feet of effective collector plate area)
BACT, MACT OSB-P1	One OSB Plant Press ¹	n/a	n/a
BACT ES-DES	Dedust conveying system, sawing, trimming, and hogging operations	CD-BH2, CD-C2, CD-52	one bagfilter (4,882 square feet of filter area) installed on a simple cyclone (120 inches in diameter) and rotary screen press process cyclone
ES-PSB	One automatic paint spray booth with double baffles and dry filters	n/a	n/a
CHIP - N - SAW			
PSD, MACT ES-LK4 and ES-LK5	two woodwaste direct-fired double track lumber kilns (32.2 million Btu per hour maximum heat input and 148,000 maximum board-feet of	n/a	n/a

	lumber per batch, each)		
F-DBCNS	debarker	n/a	n/a
ES-BC	big chipper	CD-46	cyclone (72 inches in diameter)
ES-LC	little chipper	CD-45	cyclone (64 inches in diameter)
ES-SCS	pneumatic sawdust conveying system discharging to sawdust bin (ID No. F-SWB) or fuel storage silo (ID No. ES-44S)	CD-42 CD-44S	cyclone (80 inches in diameter) discharging to the sawdust bin cyclone (72 inches in diameter) discharging to the fuel storage silo
ES-PMCS	planer mill	CD-43	bagfilter (2,310 square feet of filter area)
ES-PSCS	planer shavings conveying system	CD-44A	cyclone (48 inches in diameter)

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1- Emission Source(s) and Control Device(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

PLYWOOD

A. Fugitive Particulate Emission Sources including:

Debarker (ID No. F-DBPWOSB)

Deck saws/ slasher saws (ID No. F-DS and F-SS)

Boiler fuel house (ID No. F-BFH)

Bark hog (ID No. F-BH)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
none	No applicable requirements.	none

B. One glue line (ID No. F-GL)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
toxic air pollutants	See Section 2.2.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section 2.2.(A)(3); State-enforceable only	15A NCAC 2Q .0711

PLYWOOD

BACT

C. One shaker screen 1 chip conveying system (ID No. ES-CS1) and associated simple cyclone (ID No. CD-C17, 60 inches in diameter)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	0.60 lbs/hour, 8,260 maximum operating hours	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the shaker screen 1 chip conveying system (**ID No. ES-CS1**) shall be controlled by one simple cyclones (**ID No. CD-C17**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. a monthly external inspection of the ductwork and cyclone noting the structural integrity. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork and cyclone are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclone shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.
 The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The shaker screen 1 chip conveying system (**ID No. ES-CS1**) shall not discharge into the atmosphere more than 0.60 pound per hour of particulate matter. In addition, this shaker screen 1 chip conveying system shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

PLYWOOD

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1C.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1C.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of shaker screen 1 chip conveying system (**ID No. ES-CS1**) operation
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the shaker screen 1 chip conveying system (**ID Nos. ES-CS1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C. 3. a. (**ID Nos. ES-CS1**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish A_{normal} for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 C.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

PLYWOOD**BACT****D. One shaker screen 2 chip conveying system (ID No. ES-CS2) located at truck bin and rail loading and associated simple cyclones (ID No. CD-C5 and CD-C5A, 72 and 96 inches in diameter, respectively)**

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	1.52 lbs/hour, 8,260 maximum operating hours	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521
N/A	State-only requirement	NCGS 143-215.63 and 143-215.108

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the shaker screen 1 chip conveying system (**ID No. ES-CS2**) shall be controlled by either simple cyclone (**ID No. CD-C5**) or simple cyclone (**ID No. CD-C5A**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
- i. a monthly external inspection of the ductwork and cyclones noting the structural integrity. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork and cyclones are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

PLYWOOD

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The shaker screen 2 chip conveying system (**ID No. ES-CS2**) shall not discharge into the atmosphere more than 1.52 pounds per hour of particulate matter. In addition, this shaker screen 2 chip conveying system shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1D.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1D.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of shaker screen 2 chip conveying system (**ID No. ES-CS2**) operation
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the shaker screen 2 chip conveying system (**ID Nos. ES-CS2**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 D. 3. a. (**ID Nos. ES-CS2**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish A_{normal} for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 D.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

PLYWOOD

4. NCGS 143-215.63 and 143-215.108

- a. This permit is issued with the stipulation that in no case shall the two cyclones (ID Nos. CD-C5 and CD-C5A) installed on the chip truck and rail loading operations be operated simultaneously.

BACT

E. Plywood sawing and trimming operations (ID No. ES-CS3) with associated bagfilter (ID No. CD-BH1, 4,007 square feet of filter area) installed on two simple cyclones (ID Nos. CD-C1 and CD-8A, 156 inches in diameter and 56 inches in diameter, respectively)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	0.90 lb./hour, 8,260 maximum operating hours	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521
N/A	State-only requirement	NCGS 143-215.63 and 143-215.108

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the plywood sawing and trimming operations (ID No. ES-CS3) shall be controlled by two simple cyclones (ID Nos. CD-C1 and CD-C8A) in series with one bagfilter (ID No. CD-BH1, 4,007 square feet of filter area). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork, cyclones, and bagfilters noting the structural integrity; and
 - ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter (ID No. CD-BH1) noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclones and bagfilter are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

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Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The plywood sawing and trimming operations (**ID No. ES-CS3**) shall not discharge into the atmosphere more than 0.90 pound per hour of particulate matter. In addition, this plywood sawing and trimming system shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 E. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1E.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1E.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of plywood sawing and trimming system (**ID No. ES-CS3**) operation
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the plywood sawing and trimming operation (**ID Nos. ES-CS3**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 E. 3. a. (**ID Nos. ES-CS3**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 E.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and

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iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

4. NCGS 143-215.63 and 143-215.108

- a. This permit is issued with the stipulation that in no case shall the two cyclones (ID Nos. CD-C8 and CD-C8A) installed on the plywood trimming and sanding operations (ID No. ES-CS3) and the pressing, sawing, conveying, and transfer operations (ID No. ES-CS4) be operated simultaneously.

BACT

F. Pressing, sawing, conveying, and transfer system (ID No. ES-CS4) with associated bagfilter (ID No. CD-BH8, 407 square feet of filter area) installed on one simple cyclone (ID Nos. CD-C8, 60 inches in diameter)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	0.17 lb./hour, 8,260 maximum operating hours	15A NCAC 2D .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521
N/A	State-only requirement	NCGS 143-215.63 and 143-215.108

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the pressing, sawing, and conveying transfer system (ID No. ES-CS4) shall be controlled by one simple cyclone (ID No. CD-C8) in series with one bagfilter (ID No. CD-BH8, 407 square feet of filter area). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork, cyclone, and bagfilter noting the structural integrity; and
 - ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter (ID No. CD-BH8) noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclone, and bagfilter are not inspected and maintained.

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Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclone and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:

- i. the date and time of each recorded action;
- ii. the results of each inspection; and
- iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The pressing, sawing, and conveying transfer system (**ID No. ES-CS4**) shall not discharge into the atmosphere more than 0.17 pound per hour of particulate matter. In addition, this pressing, sawing, and conveying system shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 F. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1F.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1F.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of pressing, sawing, and conveying transfer system (**ID No. ES-CS4**) operation
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the pressing, sawing, and conveying transfer system (**ID Nos. ES-CS4**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 F. 3. a. (**ID No. ES-CS4**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the

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limit given in Section 2.1 F.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

4. NCGS 143-215.63 and 143-215.108

- a. This permit is issued with the stipulation that in no case shall the two cyclones (ID Nos. CD-C8 and CD-C8A) installed on the plywood trimming and sanding operations (ID No. ES-CS3) and the plywood woodwaste transfer operations (ID No. ES-CS4) be operated simultaneously.

BACT

- G. Four steam heated veneer dryers (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4, 50,000 square feet per hour combined drying capacity (3/8 inch basis)) with one associated four chamber natural gas-fired Regenerative Thermal Oxidizer (ID No. CD-VD, 11.0 million Btu per hour heat input capacity)**

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/ Standards	Applicable Regulation
particulate matter	adequate ductwork and properly designed collectors	15A NCAC 2D .0512
	2.0 lbs./hour particulate matter 438 million square feet of plywood (3/8 inch basis)	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
sulfur dioxide	2.3 pounds per million Btu	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
toxic air pollutants	See Section 2.2.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section 2.2.(A)(3); State-enforceable only	15A NCAC 2Q .0711

hazardous air pollutants	See Multiple Emissions Section 2.2.C(1)	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD
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1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the four steam heated veneer dryers (**ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4**) shall be controlled by a four chamber natural gas-fired Regenerative Thermal Oxidizer (**ID No. CD-VD, 11.0 million Btu per hour heat input capacity**). This Regenerative Thermal Oxidizer (RTO) shall be maintained at all times except during periods when the dryers are not operating or during previously scheduled startup or shutdown periods (including bakeouts and washouts) and Force Majeure events (including malfunctions which qualify as Force Majeure events). The minimum setpoint combustion chamber temperature shall be maintained at 1,575 degrees Fahrenheit and the actual combustion chamber temperature shall not fall below 1,525 degrees Fahrenheit at any time. In addition, airflow must not exceed the maximum airflow obtained during the latest compliance demonstration.

To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:

- i. monthly external inspection of the ductwork and Regenerative Thermal Oxidizer noting the structural integrity; and
- ii. annual internal inspection of the Regenerative Thermal Oxidizer noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork and Regenerative Thermal Oxidizer are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the Regenerative Thermal Oxidizer shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The four steam-heated plywood veneer dryers (ID Nos. ES-VD1 through ES-VD4) shall not discharge into the atmosphere more than 2.00 pounds per hour of particulate matter. [15A NCAC 2D .0530]

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Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 G. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The monitoring/recordkeeping/ reporting requirements as included in Section 2.1G.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1G.2.a. above.

3. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3. If the results of this test are above the limit given in Section 2.1 G. 3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f) and 15A NCAC 2D .0501(c)(4)(A)]

- c. No monitoring/recordkeeping is required for sulfur dioxide emissions from natural gas combustion for the RTO.

4. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the four steam-heated plywood veneer dryers (**ID Nos. ES-VD1 through ES-VD4**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 G. 4. a. (**ID Nos. ES-VD1 through ES-VD4**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 G.4. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

PLYWOOD**Reporting** [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

BACT**H. Two Plywood Presses (ID Nos. F-VP1 and F-VP2)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 2D .0512
	Limit on production of 425 million square feet of Plywood (3/8" basis) 0.03 lb./1000 square feet (3/8" basis)	15A NCAC 2D .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
toxic air pollutants	See Section 2.2.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section 2.2.(A)(3); State-enforceable only	15A NCAC 2Q .0711
hazardous air pollutants	See Multiple Emissions Section 2.2.C(1)	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.
- b. No monitoring/recordkeeping/reporting is required for particulate emissions from the two plywood presses (**ID Nos. F-VP1 and F-VP2**).

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The Plywood Presses (**ID Nos. F-VP1 and F-VP2**) shall not discharge into the atmosphere more than 0.03 pound of particulate matter per 1,000 square feet of plywood produced (3/8" basis). In addition, this source shall be limited to producing 425 million square feet of OSB (3/8 inch basis) per year. [15A NCAC 2D .0530]

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Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 H. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The monitoring/recordkeeping/ reporting requirements as included in Section 2.2.B.1.b. shall be sufficient to demonstrate compliance with the production limit of Section 2.1 H.2.a. above.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the Plywood Presses (**ID Nos. VP-1 and VP-2**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 H. 3. a. (**ID Nos. VP-1 and VP-2**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month, the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 H.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

PLYWOOD**BACT****I. Plywood sanding operations (Big Sander) (ID No. ES-BS) and associated bagfilter (ID No. ES-BS4, 3,253 square feet of filter area) installed on a simple cyclone (ID No. CD-C4, 144 inches in diameter)**

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	1.36 lbs./hour, 7,200 maximum operating hours	15A NCAC 2D .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the plywood sanding operations (**ID No. ES-BS**) shall be controlled by one simple cyclone (**ID No. CD-C4**) in series with one bagfilter (**ID No. CD-BH4**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
- monthly external inspection of the ductwork, cyclone, and bagfilter noting the structural integrity; and
 - annual (for each 12 month period following the initial inspection) (for each 12 month period following the initial inspection) internal inspection of the bagfilter (**ID No. CD-BH4**) noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclone, and bagfilter are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclone and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- the date and time of each recorded action;
 - the results of each inspection; and
 - the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

PLYWOOD

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The plywood sanding operation (**ID No. ES-BS**) shall not discharge into the atmosphere more than 1.36 pounds per hour of particulate matter. In addition, this plywood sanding operation shall be limited to 7,200 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 I. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1I.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1I.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of plywood sanding operations (**ID No. ES-BS**)
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the plywood sanding operations (**ID Nos. ES-BS**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 I. 3. a. (**ID Nos. ES-BS**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 I.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

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Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

BACT

- J. Tongue and groove sander (ID No. ES-TGS) and associated bagfilter (ID No. CD-BH3, 3,253 square feet of filter area) installed on a simple cyclone (ID No. CD-C3, 144 inches in diameter)**

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
	1.42 lbs./hour, 8,260 maximum operating hours	15A NCAC 2D .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the tongue and groove sander (**ID No. ES-TGS**) shall be controlled by one simple cyclone (**ID No. CD-C3**) in series with one bagfilter (**ID No. CD-BH3**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork, cyclone, and bagfilter noting the structural integrity; and
 - ii. annual (for each 12 month period following the initial inspection) (for each 12 month period following the initial inspection) internal inspection of the bagfilter (**ID No. CD-BH3**) noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclone, and bagfilter are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclone and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

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Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The tongue and groove sanding operation (**ID No. ES-TGS**) shall not discharge into the atmosphere more than 1.42 pounds per hour of particulate matter. In addition, this tongue and groove sanding operation shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 J. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1J.1 b., c., d., and e. shall be sufficient to ensure compliance with the emission limit of Section 2.1J.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of tongue and groove sanding operations (**ID No. ES-TGS**)
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the tongue and groove sanding operations (**ID Nos. ES-TGS**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 J. 3. a. (**ID No. ES-TGS**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 J.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;

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- ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
- iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

K. One Dry-Ply line (ID No. ES-DPL) and One Edge Seal (ID No. F-ES)

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
hazardous air pollutants	See Multiple Emissions Section 2.2.C(1)	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD

BACT

- L. Woodwaste/bark-fired boiler (ID No. ES-B1, 254 million Btu per hour heat input rate) with a propane/natural gas-fired sanderdust burner and controlled by a multicyclone (ID No. CD-MC, 200 nine-inch tubes) in series with one venturi scrubber (ID No. CD-SC, 1,200 gallons per minute minimum water injection rate)**

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/ Standards	Applicable Regulation
particulate matter	0.34 lbs/million Btu	15A NCAC 2D .0504
	31.00 lbs./hour, 8,760 maximum operating hours	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
sulfur dioxide	2.3 pounds per million Btu	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
toxic air pollutants	See Section VII.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section VII.(A)(3); State-enforceable only	15A NCAC 2Q .0711
N/A	State-only requirement	NCGS 143-215.63 and 143-215.108

PLYWOOD

1. 15A NCAC 2D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of wood that are discharged from this source into the atmosphere shall not exceed **0.34 pounds per million Btu heat input**. [15A NCAC 2D .0504]

Testing [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with and General Condition JJ. If the results of this test are above the limit given in Section 2.1 L. 1. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504.

- c. Particulate matter emissions from the boiler shall be controlled by the multicyclone (**ID No. CD-MC**) in series with one venturi scrubber (**ID No. CD-SC**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement must include the following:

- i. a monthly external visual inspection of the system ductwork and material collection units for leaks; and
- ii. an annual internal inspection of the scrubber's and multicyclone's structural integrity. As a minimum, the annual internal inspection of the scrubber shall include the following:

- A. An inspection of the spray nozzles, chemical feed system (if so equipped), and the cleaning/calibration of all equipment.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504 if the scrubber, multicyclone, and ductwork are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:

- i. the date and time of each recorded action;
- ii. the results of each inspection;
- iii. a report of any maintenance performed on the scrubber and multicyclone; and
- iv. any variance from manufacturer's recommendations, if any, and corrections made.

Reporting [15A NCAC 2Q .0508(f)]

- e. Within 30 days of a written request from the DAQ, the Permittee shall submit a report of any maintenance performed on the scrubber and multicyclone.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The woodwaste/bark-fired boiler (ID Nos. ES-B1) shall not discharge into the atmosphere more than 31.00 pounds per hour of particulate matter. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 L. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit above by testing the boiler (**ID Nos. ES-B1**) for particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in Section 3 - General Condition JJ. Testing shall be completed and the results submitted **within one year of issuance of permit and once per year thereafter** unless an alternate date is approved by the DAQ. If the results of this test are above the limit given in Section 2.1 L.2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530. The following conditions shall apply during testing:

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- 1) The boiler shall operate at a minimum of 90 percent of maximum operating conditions or at a level representative of average load over the previous twelve months during stack testing to determine compliance with the maximum allowable emission rate. If testing at average load, supporting documentation must be available to the DAQ at the time of testing and provided as part of the final test report.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- d. The monitoring/recordkeeping/ reporting requirements as included in Section 2.1L.1 c., d., e., and f. shall be sufficient to comply with the emission limit of Section 2.1L.2.a. above.

3. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this boiler (ID No. ES-B1) shall not exceed **2.3 pounds per million Btu heat input**. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3. If the results of this test are above the limit given in Section 2.1 L.3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f) and 15A NCAC 2D .0501(c)(4)(A)]

- c. No monitoring/recordkeeping is required for sulfur dioxide emissions from the firing of wood in the boiler.

4. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this boiler (ID No. ES-B1) shall not be more than **20 percent opacity** when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 L.4. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, **once a day** the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following permit effective date. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 L.4. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.
- d. After one calendar year of daily observations without any violation of 15A NCAC 2D .0521, the Permittee may reduce the boiler visual emissions monitoring frequency to **once a week** upon providing a notification and supporting documentation for the monitoring reduction to the DAQ.

Recordkeeping [15A NCAC 2Q .0508(f)]

- e. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

PLYWOOD**Reporting** [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

STATE-ONLY REQUIREMENT**5. NCGS 143-215.63 and 143-215.108**

The woodwaste/bark-fired boiler (ID No. ES-B1) may be used to combust up to 4.5 tons per year of blue edge seal and white logo paint solids generated from the cleanup of OSB paint spray booth (ID No. ES-PSB). No other paint solids are to be burned unless analysis for metals and heat value are conducted and submitted to the Regional Supervisor, Washington Regional Office, Division of Air Quality, for review and approval.

OSB**BACT**

- M. Three sanderdust/ woodwaste-fired rotary dryers (ID Nos. ES-RD1, ES-RD2, and ES-RD3, 120 million Btu per hour total heat input capacity of the three dryers) with a propane/natural gas pilot with three associated simple cyclones (ID Nos. CD-D1, CD-D2, and CD-D3, 144 inches in diameter each) installed in series with an electrostatic precipitator with prequench (ID No. CD-ESP, 39,036 square feet of effective collector plate area)**

Regulated Pollutant	Limits/ Standards	Applicable Regulation
particulate matter	For process rates less than 30 tons per hour $E=4.10P^{0.67}$ where E =allowable emission rate in pounds per hour P =process weight in tons per hour	15A NCAC 2D .0515
	30.00 lbs./hour	15A NCAC 2D .0317 (15A NCAC 2D .0530)
sulfur dioxide	2.3 pounds per million Btu	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
toxic air pollutants	See Section 2.2.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section 2.2.(A)(3); State-enforceable only	15A NCAC 2Q .0711

OSB

1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 M. 1. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f)]

- c. Particulate matter emissions from the three rotary dryers (ID Nos. ES-RD1 through ES-RD3) shall be controlled by three cyclones (ID Nos. CD-D1, CD-D2, and CD-D3, 144 inches in diameter each) installed in series with an electrostatic precipitator with prequench (ID No. CD-ESP, 39,036 square feet of effective collector plate area). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. a monthly visual inspection of all system ductwork and control devices for leaks including the following items for the precipitator:
- A. Visual checks of critical components such as rappers and ash removal equipment;
 - B. Checks for any equipment that does not generate an alarm in the turned-off state, to ensure it is switched on;
 - C. Checks for any signs of plugging of gas distribution plates, and excessive buildup on inlet and outlet plenum floor surfaces;
 - D. Checks for signs of hopper plugging; and
 - E. Checks for broken rapper rod insulators, cracked support bushing insulators, and broken or loose stabilizer bar insulators (if installed), and replacement as required; and
- ii. an annual (for each 12 month period following the initial inspection) internal inspection of the electrostatic precipitator's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the ductwork, cyclones, and electrostatic precipitator are not inspected and maintained.

- d. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the cyclones and electrostatic precipitator; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the cyclones and electrostatic precipitator within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

OSB

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The three sanderdust/woodwaste-fired rotary dryers (ID Nos. ES-RD1 through ES-RD3) shall not discharge into the atmosphere more than 30.00 pounds per hour of particulate matter. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 M. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit above by testing the three sanderdust/woodwaste-fired rotary dryers (**ID Nos. ES-RD1, ES-RD2, and ES-RD3**) for particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in Section 3 - General Condition JJ. Testing shall be completed and the results submitted **within one year of issuance of permit and once per year thereafter** unless an alternate date is approved by the DAQ. If the results of this test are above the limit given in Section 2.1 M. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530. The following conditions shall apply during testing:
 - 1) The dryers shall operate at a minimum of 90 percent of maximum operating conditions or at a level representative of average load over the previous twelve months to determine compliance with the maximum allowable emission rate. If testing at average load, supporting documentation must be available to the DAQ at the time of testing and provided as part of the final test report.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- d. The monitoring/recordkeeping/ reporting requirements as included in Section 2.1M.1 c., d., e., and f. shall be sufficient to ensure compliance with the emission limit of Section 2.1M.2.a. above.

3. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3. If the results of this test are above the limit given in Section 2.1 M. 3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f) and 15A NCAC 2D .0501(c)(4)(A)]

- c. No monitoring/recordkeeping is required for sulfur dioxide emissions from natural gas/ propane/ sanderdust/ woodwaste for these sources.

4. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the three sanderdust/ woodwaste-fired rotary dryers (**ID Nos. ES-RD1 through ES-RD3**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 M. 4. a. (**ID Nos. ES-RD1 through ES-RD3**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

OSB**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 M.4. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

BACT**N. One OSB Plant Press (ID No. OSB-P1)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 2D .0512
	Limit on production of 200 million square feet of OSB (3/8" basis) 0.26 lbs/1000 square feet (3/8" basis)	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806
toxic air pollutants	See Section 2.2.(B)(1); State-enforceable only	15A NCAC 2D .1100
toxic air pollutants	See Section 2.2.(A)(3); State-enforceable only	15A NCAC 2Q .0711
hazardous air pollutants	See Multiple Emissions Section 2.2.C(1)	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD

OSB

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.
- b. No monitoring/recordkeeping/reporting is required for particulate emissions from the OSB press (**ID No. OSB-P1**).

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The OSB Plant Press (ID Nos. OSB-P1) shall not discharge into the atmosphere more than 0.26 pounds of particulate matter per 1,000 square feet of OSB produced (3/8" basis). In addition, this source shall be limited to producing 200 million square feet of OSB (3/8 inch basis) per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 N. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The monitoring/recordkeeping/ reporting requirements as included in Section 2.2 B.1.b. below shall be sufficient to comply with the emission limit of Section 2.1 N.2.a. above.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the OSB Plant Press (**ID Nos. OSB-P1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 N. 3. a. (**ID Nos. OSB-P1**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month, the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 N.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

OSB

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

BACT

O. OSB Dedust conveying system (ID No. ES-DECS) collecting woodwaste from sawing, trimming, and hogging operations with associated bagfilter (ID No. CD-BH2, 4,882 square feet of filter area) in turn installed on a simple cyclone (ID No. CD-C2, 120 inches in diameter) and simple cyclone (ID No CD-52)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/ Standards	Applicable Regulation
particulate matter	adequate ductwork and properly designed collectors	15A NCAC 2D .0512
	1.71 lbs./hour and 8,260 maximum operating hours for source	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
visible emissions	20 percent opacity	15A NCAC 2D .0521

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the OSB Dedust conveying system (**ID No. ES-DECS**) shall be controlled by two simple cyclones (**ID Nos. CD-C2 and CD-52**) in series with one bagfilter (**ID No. CD-BH2, 4,882 square feet of filter area**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork, cyclones, and bagfilters noting the structural integrity; and
 - ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter (ID No. CD-BH2) noting the structural integrity and the condition of the filters.
 The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclones, and bagfilter are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones and bagfilters shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.
 The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

OSB

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

2. 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The OSB Dedust conveying system (**ID No. ES-DECS**) shall not discharge into the atmosphere more than 1.71 pounds per hour of particulate matter. In addition, this OSB Dedust conveying system shall be limited to 8,260 operating hours per year. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 O. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. The control device monitoring/recordkeeping/ reporting requirements as included in Section 2.1N.1 b., c., d., and e. shall be sufficient to comply with the emission limit of Section 2.1O.2.a. above.
- d. To ensure compliance with the limit on annual hours of operation, the following shall be reported to the Regional Supervisor, Division of Air Quality within 30 days after the end of each calendar year quarter:
 - i. Actual hours of OSB Dedust conveying system operation
 - A. For each month during the quarter, and
 - B. For each 12 month period ending on each month during the quarter using a 12 month rolling average.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the OSB Dedust conveying system (**ID Nos. ES-DECS**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 O. 3. a. (**ID Nos. ES-DECS**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month, the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 O.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

P. One automatic paint spray booth with double baffles and dry filters (ID No. ES-PSB)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/ Standards	Applicable Regulation
Particulate matter	adequate ductwork and properly designed collectors	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	See Section 2.2.(A)(2)	15A NCAC 2D .0958
odorous emissions	See Section 2.2.(A)(1); State-enforceable only	15A NCAC 2D .1806

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the spray booth (**ID No. ES-PSB**) shall be controlled by adequate ductwork and properly designed collectors. To assure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
 - i. weekly inspection of the spray booth’s filters noting the condition; and
 - ii. annual (for each 12 month period following the initial inspection) inspection of the associated ductwork noting structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the filters are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the spray booths shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

OSB

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the automatic paint spray booth (**ID Nos. ES-PSB**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 P. 2. a. (**ID Nos. ES-PSB**) above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish “normal” for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 P.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

Q. Two woodwaste direct-fired double track lumber kilns (ID Nos. ES-LK4 and ES-LK5)

The following table provides a summary of limits and standards for the emission sources described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	$E = 4.10 P^{0.67}$ where E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 2D .0515
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
odors	See Multiple Emissions Section 2.2.A(1) - State-enforceable Only	15A NCAC 2D .1806
PSD VOC	228 tons per year	15A NCAC 2Q .0317 (15A NCAC 2D .0530)
TAP	See Multiple Emissions Section 2.2.B(1) - State-enforceable Only	15A NCAC 2D .1100
TAP	See Multiple Emissions Section 2.2.A(3) - State-enforceable Only	15A NCAC 2Q .0711
hazardous air pollutants	See Multiple Emissions Section 2.2.C(1)	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD
TAP	See Multiple Emissions Section 2.2.C(2) - State-enforceable Only	15A NCAC 2Q .0705(a)(1) 15A NCAC 2Q .0711 15A NCAC 2D .1100

1. 15A NCAC 2D .0515: PARTICULATE FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from the woodwaste direct-fired lumber kilns (ID Nos. ES-LK4 and ES-LK5) shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 2Q .0501 (c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 Q.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.
- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of wood in the direct-fired lumber kilns.

2. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from the woodwaste direct-fired lumber kilns shall not exceed **2.3 pounds per million Btu heat input**. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

CHIP N SAW

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3. If the results of this test are above the limit given in Section 2.1 Q.2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.
- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of wood in the direct-fired lumber kilns.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the direct-fired lumber kilns (ID Nos. ES-LK4 and ES-LK5) shall not be more than **20 percent opacity** when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 Q.3.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.
- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of wood in the direct-fired lumber kiln burners and the drying of lumber in the kilns.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for

4. 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. The Permittee shall comply with all the requirements in accordance with the PSD, Final Determination by the Division of Air Quality dated August 16, 1997. The Permittee shall not exceed the VOC emission limit of **3.8 pound per thousand board feet of lumber and 228 tons per year** from the lumber kilns (ID Nos. ES-LK4 and ES-LK5). The amount of Southern Yellow Pine lumber dried in the lumber kilns (ID Nos. ES-LK4 and ES-LK5) shall not exceed **120 million board feet of lumber per year**.

Testing [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the Permittee shall perform such testing in accordance with 15A NCAC 2D .0501(c)(3) and General Condition JJ found in Section 3. If the average of the results of this test are above the limit given in Section 2.1 Q.4.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping [15A NCAC 2Q .0508 (f)]

- c. Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of lumber dried in the kilns by an emission factor of **3.8 pounds of VOC emissions per thousand board feet of lumber** dried. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the VOC emissions exceed the limit given in Section 2.1 Q.4.a. above.
- d. Calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amounts of lumber dried and VOC's emitted are not monitored and recorded.

Reporting [15A NCAC 2Q .0508 (f)]

- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities within 30 days after each calendar year quarter, due and postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 for the calendar year for the preceding three-month period between July and September. The report shall contain the following:

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- i. The monthly VOC emissions for the previous 14 months. The emissions shall be calculated for each of the 12-month periods over the previous 14 months
- ii. The monthly quantities of lumber dried for the previous 14 months; and
- iii. All instances of deviations from the requirements of this permit must be clearly identified.

R. Woodworking operations including:

one debarker (ID No. F-DBCNS),

two chippers (ID Nos. ES-BC and ES-LC) and associated cyclones (ID Nos. CD-46 and CD-45),

one sawdust conveying system (ID No. ES-SCS) and associated cyclones (ID Nos. CD-42 and CD-44S),

one planer mill (ID No. ES-PMCS) and associated bagfilter (ID No. CD-43), and

one planer shavings conveying system (ID No. ES-PSCS) and associated cyclone (ID No. CD-44A)

The following table provides a summary of limits and standards for the emission sources described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	adequate duct work and properly designed collectors	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521
odors	See Multiple Emissions Section 2.2.A(1) - State-enforceable Only	15A NCAC 2D .1806

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the two chippers (ID Nos. ES-BC and ES-LC), the sawdust conveying system (ID No. ES-SCS), and the planer shavings conveying system (ID No. ES-PSCS) shall be controlled by five cyclones (ID Nos. CD-46, CD-45, CD-42 or CD-44S, and CD-44A, respectively). Particulate emissions from the planer mill (ID No. ES-PMCS) shall be controlled by one bagfilter (ID No. CD-43). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork, cyclones, and bagfilters noting the structural integrity; and
 - ii. annual internal inspection of the bagfilters noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclones and bagfilters are not inspected and maintained.

CHIP N SAW

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones and the bagfilter shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

Reporting [15A NCAC 2Q .0508 (f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and by July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the debarker (ID No. F-DBCNS), the chippers (ID Nos. ES-45 and ES-46), the sawdust conveying system (ID No. ES-SCS), the planer mill (ID No. ES-PMCS), and the planer shavings conveying system (ID No. ES-PSCS) shall not be more than **20 percent opacity** when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 R.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once every six months the Permittee shall observe the emission points of this source for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 R.2. a. above.If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

CHIP N SAW

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2.2- Multiple Emission Source(s) Specific Limitations and Conditions

A. Facility-wide affected sources

The above emission sources are subject to this multiple emission source limit.

Regulated Pollutant	Limits/Standards	Applicable Regulation
odors	odorous emissions must be controlled; State enforceable only	15A NCAC 2D .1806
volatile organic compounds	work practice standards	15A NCAC 2D .0958
toxic air pollutants	Toxic air pollutant emissions shall not exceed the levels listed in 2Q .0711 unless ambient standards are not exceeded; State-enforceable only	15A NCAC 2Q .0711

STATE-ONLY REQUIREMENT: ODOR REQUIREMENTS

1. 15A NCAC 2D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

2. 15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

- a. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:

- (1) store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
- (2) clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
- (3) store wipe rags containing volatile organic compounds in closed containers,
- (4) not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
- (5) transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
- (6) clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]

- b. When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:
 - (1) flush parts in the freeboard area,
 - (2) take precautions to reduce the pooling of solvent on and in the parts,
 - (3) tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 - (4) not fill cleaning machines above the fill line,
 - (5) not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

Monitoring

- c. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Recordkeeping

- d. The results of the inspections shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each inspection; and
 - ii. the results of each inspection noting whether or not noncompliant conditions were observed.If the required records are not maintained the permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Reporting

- e. The Permittee shall submit a summary report of the observations by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

STATE-ENFORCEABLE ONLY

3. 15A NCAC 2Q .0711: PERMIT REQUIREMENTS FOR TOXIC AIR POLLUTANTS

The Georgia-Pacific Plywood Plant and adjacent OSB and Chip-N-Saw Plants shall be operated and maintained in such a manner that emissions of TAPs, including fugitive emissions, from the combined facilities will not exceed the TPERs, as listed below, without the Permittee first obtaining a permit to emit TAPs. Pursuant to 15A NCAC 2Q .0711 Emission Rates Requiring a Permit, for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711.

- i. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPERs.
- ii. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D.1100 "Control of Toxic Air Pollutants".
- iii. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

Pollutant (CAS Number)	TPERs Limitations			
	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
acetaldehyde (75-07-0)				6.8
carbon tetrachloride (56-23-5)	460			
chloroform (67-66-3)	290			
methyl ethyl ketone (78-93-3)		78		22.4
methyl isobutyl ketone (108-10-1)		52		7.6
pentachlorophenol (87-86-5)		0.063	0.0064	
polychlorinated biphenyls (1336-36-3)	5.6			
styrene (100-42-5)			2.7	
toluene (108-88-3)		98		14.4
xylene (1330-20-7)		57		16.4

STATE-ENFORCEABLE ONLY

B. Georgia-Pacific, Dudley, NC Emission Sources including:

- X Sources at the OSB Plant (Permit No. 04923T22) including the OSB Plant Press (ID No. OSB-P1), the three OSB sanderdust/woodwaste-fired rotary dryers (ID Nos. ES-RD1, ES-RD2, and ES-RD3), and Boiler (ID No. ES-B1);
- X Sources at the Plywood Plant (Permit No. 09268T01) including the two Plywood Presses (ID Nos. F-VP1 and F-VP-2) , the two Steam-heated Plywood Veneer Dryers (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4), and the Boiler (ID No. ES-B1); and
- X Sources at the Chip-N-Saw Plant (Facility ID No. 07/96/00234) including two Lumber kilns (ID Nos. ES-LK4 and ES-LK5)

The above emission sources are subject to this multiple emission source limit.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Toxic air pollutants	Toxic air pollutant emissions shall not exceed their modeled acceptable ambient levels; State - enforceable only	15A NCAC 2D .1100

1. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT** - Pursuant to 15A NCAC 2D .1100 "Control of Toxic Air Pollutants," and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

Emission Source(s)	Toxic Air Pollutant(s)	Emission Limit(s)
OSB Press (ID No. OSB-P1)	formaldehyde	1.00 lb./hour
	phenol	1.64 lbs./hour
OSB Dryers (ID Nos. ES-RD1, ES-RD2, and ES-RD3)	acrolein	1.81 lbs./hour
	arsenic compounds	5.05 lbs./year
	benzene	1,489.2 lbs./year
	beryllium	0.832 lbs./year
	cadmium	1.796 lbs./year
	chlorine	0.0948 lb./hour
	chromium VI	3.78 lbs./year
	formaldehyde	3.26 lbs./hour
	hydrogen chloride	1.73 lbs./hour
	manganese	4.56 lbs./day
	mercury	0.0023 lb./day
	nickel	0.372 lb./day
	phenol	0.377 lb./hour
vinyl chloride	19.36 lbs./year	
Plywood Presses (ID Nos. VP-1 and VP-2)	formaldehyde	0.0461 lb./hour each
	phenol	0.0340 lbs./hour each
Plywood Dryers (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4)	benzene	17.52 lbs./year
	formaldehyde	0.0180 lb./hour
	phenol	0.056 lb./hour
Boiler (ID Nos. ES-B1)	acetaldehyde	0.63 lb./hour
	acrolein	0.144 lb./hour
	arsenic compounds	10.69 lbs./year
	benzene	21,900 lbs./year
	beryllium	1.76 lbs./year
	cadmium	3.802 lbs./year
	chlorine	0.201 lb./hour
	chromium VI	8.007 lbs./year

Emission Source(s)	Toxic Air Pollutant(s)	Emission Limit(s)
	formaldehyde	1.54 lbs./hour
	hydrogen chloride	3.66 lbs./hour
	manganese	9.624 lbs./day
	mercury	0.0048 lb./day
	nickel	0.0150 lb./day
	phenol	0.0187 lb./hour
	vinyl chloride	40.91 lbs./year
Chip-N-Saw Kilns (ID Nos. ES-LK4 and ES-LK5)	acrolein	0.0322 lbs./hour each
	arsenic compounds	0.0705 lb./year each
	benzene	143.66 lbs./year each
	beryllium	0.223 lb./year each
	cadmium	0.483 lb./year each
	chlorine	0.0254 lb./hour each
	chromium VI	0.0523 lb./year each
	formaldehyde	0.0486 lb./hour each
	hydrogen chloride	0.464 lb./hour each
	manganese	1.222 lb./day each
	mercury	0.00062 lb./day each
	nickel	0.0019 lb./day each
	phenol	0.0013 lb./hour each
	vinyl chloride	0.261 lbs./year each

- a. To ensure compliance with the above limits, the following restrictions shall apply:
- i. The maximum throughput of the OSB press (ID No. OSB-P1) shall not exceed 200 million square feet (3/8" basis) of Oriented Strand Board (OSB) per year.
 - ii. The maximum amount of woodwaste fired in the Plywood facility boiler (ID No. ES-B1) shall not exceed 28.5 tons per hour.
 - iii. The maximum throughput of the Plywood Presses (ID Nos. VP-1 and VP-2) shall not exceed 425 million square feet (3/8" basis) of plywood veneer per year.
 - iv. The maximum throughput of the Plywood Veneer Dryers (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4) shall not exceed 438 million square feet (3/8" basis) of plywood veneer per year.

- b. For compliance purposes, within 30 days after then end of each calendar year quarter, regardless of actual emissions, the following shall be reported to the Regional Supervisor, Division of Air Quality:
 - i. The maximum amount of woodwaste fired in the Plywood facility boiler (tons/hour)
 - A. for each month during the quarter;
 - ii. The throughput of the Plywood veneer dryers (million square feet on 3/8 inch basis)
 - A. for each month during the quarter, and
 - B. for each 12 month period ending on each month during the quarter using a 12 month rolling sum;
 - iii. The throughput of the Plywood presses (million square feet on 3/8 inch basis)
 - A. for each month during the quarter, and
 - B. for each 12 month period ending on each month during the quarter using a 12 month rolling sum.

C. Facility wide emission sources

The following table provides a summary of limits and standards for the emission sources described above:

Regulated Pollutant	Limits/Standards	Applicable Regulations
hazardous air pollutants	Future MACT for Plywood and Composite Wood Products Manufacture	15A NCAC 2D .1111 40 CFR 63, Subpart DDDD
TAP	Future TAP assessment of facility wide sources not defined as wood furniture manufacturing operations in 40 CFR 63.801(a) due at with permit application to comply with last applicable MACT (i.e., DDDD) State Only Requirement	15A NCAC 2Q .0705(a)(1) 15A NCAC 2Q .0711 15A NCAC 2D .1100

1. 15A NCAC 2D .1111 [40 CFR Part 63 Subpart DDDD] NESHAP for Plywood and Composite Wood Products Manufacture

The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, “Maximum Achievable Control Technology” (MACT) as promulgated in 40 CFR Part 63, Subpart DDDD by October 1, 2008. [40 CFR 63.2233(b)]

- a. Demonstration of compliance must be made no later than March 29, 2009 if a performance test is required [40 CFR 63.2261(a)], or October 31, 2008 if a performance test is not required [40 CFR 63.2261(b)].
- b. Notification of compliance status is due by May 28, 2009 if a performance test is required or by November 30, 2008 if a performance test is not required [40 CFR 63.2280(d)] and shall consist of:
 - i. compliance test results or other initial compliance demonstration, as appropriate, submitted to the DAQ regional office and
 - ii. a permit application submitted to the DAQ central office for the incorporation of all work practice standards, emission limits, and monitoring, recordkeeping, and reporting requirements to this permit.

State Only Requirement

2. 15A NCAC 2Q .0705: EXISTING FACILITIES AND SIC CALLS

- a. Air Permit Application Submittal Requirements - In accordance with 15A NCAC 2Q .0705(b), for sources at a facility subject to a MACT standard, excluding the MACT for combustion sources, an air permit application shall be required demonstrating compliance with 15A NCAC 2D .1100 “Control of Toxic Air Pollutants”:
 - i. at the same time the facility submits an air permit application to comply with the last MACT standard (*excluding the MACT for combustion sources*); or
 - ii. on or before the last MACT standard (*excluding the MACT for combustion sources*) compliance deadline date. To allow the Division time to process an application before the compliance deadline date you should submit an application no later than three month prior to the compliance deadline date if you need a construction/operation permit for the installation of a control device(s) to comply with either 2D .1100 or the last MACT standard (*excluding the MACT for combustion sources*).

- b. The permit application demonstrating compliance with 15A NCAC 2D .1100 shall include an evaluation for all toxic air pollutants covered under rule 15A NCAC 2D .1104 for all sources at the facility, excluding those sources exempt from evaluation under 15A NCAC 2Q .0702. If the facility has already demonstrated facility-wide compliance with 2D .1100 the application should include the date of compliance demonstration, air permit number, and a list of applicable toxic pollutants.
- c. Compliance Deadline Date Requirement - The facility shall be in compliance with the 15A NCAC 2D .1100 Toxic Air Pollutants rule by the same deadline date that it is required to be in compliance with the last MACT standard (*excluding the MACT for combustion sources*).

2.3- Other Applicable Requirement - Parametric Monitoring System for Regenerative Thermal Oxidizer

A. Four steam heated veneer dryers (ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4, 50,000 square feet per hour combined drying capacity (3/8 inch basis)) with one associated four chamber natural gas-fired Regenerative Thermal Oxidizer (ID No. CD-VD, 11.0 million Btu per hour heat input capacity)

1. Parametric Monitoring System for Regenerative Thermal Oxidizer (ID No. CD-VD)

Parametric Monitoring System

- a. Volatile organic compound emissions from the four steam heated veneer dryers (**ID Nos. ES-VD1, ES-VD2, ES-VD3, and ES-VD4**) shall be controlled by a four chamber natural gas-fired Regenerative Thermal Oxidizer (**ID No. CD-VD, 11.0 million Btu per hour heat input capacity**). This Regenerative Thermal Oxidizer (RTO) shall maintain a minimum VOC destruction efficiency of 90% for the captured VOC emissions. The 90% destruction efficiency shall be maintained at all times except during periods when the dryers are not operating or during previously scheduled startup or shutdown periods (including bakeouts and washouts) and Force Majeure events (including malfunctions which qualify as Force Majeure events). In order to maintain the 90% destruction efficiency, the minimum setpoint combustion chamber temperature shall be maintained at 1,575 degrees Fahrenheit and the actual combustion chamber temperature shall not fall below 1,525 degrees Fahrenheit at any time. In addition, airflow measured at the outlet of the RTO must not exceed the maximum airflow obtained during the most recent compliance demonstration.

Compliance Control Requirements

- b. The compliance control parameters will be RTO retention chamber temperature and outlet volumetric air flow. Both parameters will be controlled, monitored, and recorded continuously. Readings of the compliance control parameters will be recorded every 15 minutes and averaged every 12 hours.

Operational Status Indicators

- c. The operational status indicators of static pressure at the inlet of the RTO ID fan will be monitored continuously, recorded every 15 minutes, and reported in 12-hour averages. Position of the isolation dampers will be monitored continuously and recorded as they change position.

Monitoring

- d. Two parameters will be monitored to demonstrate that the destruction efficiency of the RTO will remain above the 90% destruction efficiency levels. The RTO retention chamber temperature must remain above the proposed appropriate operating criteria of 1,575 degrees Fahrenheit, and the air flows measured at the outlet of the RTO must fall below the proposed appropriate operating criteria of highest airflow obtained during the most recent compliance demonstration. These criteria represent a worst case scenario for operating the veneer dryers. A worst case scenario is defined as a condition where all veneer dryers are online and operating at maximum sustainable throughputs.

i. RTO Temperature Monitoring

The RTO temperature to be monitored is the average of temperatures taken by thermocouples located in the retention chamber of the RTO. The RTO retention chamber temperature is set to be maintained at 1,575 degrees Fahrenheit. Since a variation of +/- 50 degrees Fahrenheit can be expected between the thermocouples, a minimum operating temperature of 1,525 degrees Fahrenheit is required.

Testing [15A NCAC 2D .0501 (c)(3)]

- e. Compliance shall be determined with the 90 percent VOC reduction requirement above by testing the RTO inlet and outlet (**ID Nos. CD-VD**) for volatile organic compounds in accordance with a testing protocol approved by the DAQ. Testing shall be completed and the results submitted **within two years of issuance of permit and biennially thereafter**.

Calibration and Quality Assurance

- f. The parametric monitoring devices will be calibrated or reevaluated based on compliance demonstration tests.

i. Brandt Gas/ Air Flow Sensor

The Brandt Air/ Gas Flow Sensor will be calibrated annually according to the manufacturer's specifications.

ii. Temperature Verification

The system temperature measurements will be verified at least every 120 days by comparing recorded measurements against measurements taken by means of a calibrated NIST traceable thermocouple meter. This will be accomplished by inserting the portable thermocouple probe into the retention chamber through the bumper access port or another suitable location and recording the measurements taken by the portable unit and comparing the system readings. Any comparisons outside the accuracy of the manufacturer's specifications will be noted, and the thermocouple will be replaced.

iii. Relative Accuracy Test Audit (RATA) for the Airflow Monitor

This Flow RATA follows the principles of the procedures set forth in 40 CFR 75, Appendix A - Specifications and Test Procedures, and 40 CFR 60, Appendix A, with the following exceptions.

Only the maximum flow condition will be tested.

Twelve data sets will be taken. The test run with the single lowest Reference Method value will be discarded, and the test run with the single highest Reference Method value will be discarded as well as the median average run.

iv. Wonderware Industrial SQL Server

The Wonderware Industrial SQL Server will be manually checked and restarted at least weekly to ensure that the system continues to operate and does not overload the RAM memory in the computer. The programming will be checked at least every 120 days to ensure that the system is tracking all the parameters that have been defined and monitored. The system will be checked for proper software version, and any upgrades issued by the software vendor will be evaluated. The Sequel Server Control system will be checked for proper operation and frequency of restarting. All changes to any system will be incorporated into all of the systems so that all systems are identical.

v. System Reliability and Operation Verification Audits

Verification of system reliability and operation will be conducted every 120 days. In addition, some system components will be checked on a more frequent basis as determined by operating experience and conditions. Verification audits will include checking the Brandt airflow sensor, thermocouples, airflow purging system, Wonderware, data management, and isolation damper position as follows:

- A. Brandt Air Flow Meter
The Brandt air flow meter system will be checked in reference to the calibration table developed by the manufacturer of the transmitter. Also, actual airflow traverses with pitot tubes will be done at the RTO stack. The resulting airflows will be compared to the airflows on the computer generated readout. The system will be checked for mechanical tightness of all fittings and all electrical connections. Corrections will be made as necessary and documented on the system assessment report.
- B. Thermocouples
The system temperature measurements will be verified by comparing recorded measurements against measurements taken by means of a calibrated NIST traceable thermocouple meter. Deviations outside the range specified by the manufacturer will result in the replacement of thermocouples.
- C. Purging System
The unit will be checked for proper operation by observing the cycle times weekly and programming the unit for the proper purge cycle. A manual purge will be conducted weekly, while an observer verifies that the system is in fact purging the tubes. The purge air pressure will be checked to assure that adequate pressure is present to properly purge the flow tubes.
- D. Wonderware Industrial SQL Server
The system will be checked for the proper parameters and assigned tag names to ensure that the system is generating the proper data for the compliance control parameters and operational status indicators being monitored. The system will be updated as required when the software revisions become available from the manufacturer. The tag name parameters will be checked to ensure that the ranges are correct for the individual system requirements. Additional programming will be done as the need for additional information is identified. This programming will be consistent on all of the units and Parametric Monitoring Systems at Phase I and Phase II facilities.
- E. Data Management
The computer hard drive will be checked for the proper maintenance of initial data and the proper retention of the printed data.
- F. Isolation Damper Positions
The system generates a report that summarizes the activation of the isolation damper position in the event of an abort condition. These records will be checked for proper logging and cross-referenced to actual dryer downtime logs. These records will also be checked for the proper retention schedule.
- G. Daily Check
The Operator will print out the monitoring report daily and check the data for completeness, legibility, reasonableness, and accuracy. Any items that are outside of the normal ranges will be immediately investigated to determine the reason for the discrepancy. If the operator cannot find the problem within a reasonable time frame, the manufacturer will be contacted or other sources of assistance will be called to investigate and correct the problem.
- H. Corrective Actions
The RTO control system features audible and visible alarms to alert personnel of a malfunction. These alarms will remain active until the proper corrective action is taken. If deficiencies in the performance of the parametric monitoring system occur, corrective action(s) must be taken. These alarms are automatically recorded with the isolation damper position report. Corrective actions may include revision of operating and /or maintenance procedures, disciplining, training, or increasing number of personnel.

vi. Maintenance Plan

Georgia-Pacific has developed and implemented a maintenance schedule which includes daily, weekly, monthly, quarterly, semi-annual, and annual maintenance activities recommended by the equipment manufacturer and/ or determined by Georgia-Pacific as necessary. The maintenance schedule and related supporting information will be checked during the System Reliability and Operation Verification Audits to ensure compliance with the task schedule and frequency. Deficiencies will be noted, and the appropriate action will be taken to correct these deficiencies. These maintenance tasks will assure that the RTO and

PM systems are being maintained as per manufacturer's specifications which have been developed to enhance the reliability of the equipment and minimize the possibility of malfunction of the systems due to a preventable failure.

vii. Recordkeeping and Reporting

Recordkeeping and reporting will be conducted, and Parametric Monitoring records will be retained for 5 years. Operators will maintain a log sheet to document a description of the operating conditions that cause isolation of the dryers from the RTO. This information will be matched with a computer-generated report that continuously records the status of the isolation dampers.

viii. Data Management and Archiving

The data will be saved on the computer hard drive and floppy disks for electronic archiving. Also, a copy of the Parametric Monitoring System computer program will be made and stored at the plant. This will allow the plant to immediately reload the programming of the Parametric Monitoring System into another computer in the event of a total failure of the computer.

Hard copies of the data will be printed daily and stored in a suitable file for a period of 5 years as required by the Consent Decree. These records will be placed at the Environmental Coordinator's office and placed in an area accessible for inspection. Additionally, the compliance control parameters are recorded on a chart recorded and used as back-up data in the event of failure of the dedicated PC.

Malfunction reports will be checked against the downtime records to ensure that all of the proper reporting conditions have been met as required by the applicable State regulations and Permit. Any deficiencies will be brought to the attention of the responsible persons and reported to the appropriate authorities.

SECTION 3 - GENERAL CONDITIONS

This section describes terms and conditions applicable to this Title V facility. All references to the "permit" in this section apply only to Part I of the permit.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 2Q .0508(i)(16)]

1. **Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 2D and 2Q.**
2. **The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.**
3. **This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.**
4. **This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.**
5. **Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.**
6. **Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.**

B. **Permit Availability** [15A NCAC 2Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package.

The permit and application shall be made available to an authorized representative of Department of Environment and Natural Resources upon request.

C. **Severability Clause** [15A NCAC 2Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 2Q .0507(e) and 2Q .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance
North Carolina Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

E. **Duty to Comply** [15A NCAC 2Q .0508(i)(2)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 2Q .0514]

The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 2Q .0514.

2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 2Q .0524 and 2Q .0505]

The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 2Q.0524 and 2Q .0505.

3. Minor Permit Modifications [15A NCAC 2Q .0515]

The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 2Q .0515.

4. Significant Permit Modifications [15A NCAC 2Q .0516]

The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 2Q .0516.

5. Reopening for Cause [15A NCAC 2Q .0517]

The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 2Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Section 502(b)(10) Changes [15A NCAC 2Q .0523(a)]

a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:

i. the changes are not a modification under Title I of the Federal Clean Air Act;

ii. the changes do not cause the allowable emissions under the permit to be exceeded;

- iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
 - iv. the Permittee shall attach the notice to the relevant permit.
 - c. The written notification shall include:
 - i. a description of the change;
 - ii. the date on which the change will occur;
 - iii. any change in emissions; and
 - iv. any permit term or condition that is no longer applicable as a result of the change.
 - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
2. Off Permit Changes [15A NCAC 2Q .0523(b)]
The Permittee may make changes in the operation or emissions without revising the permit if:
- a. the change affects only insignificant activities and the activities remain insignificant after the change;
or
 - b. the change is not covered under any applicable requirement.
3. Emissions Trading [15A NCAC 2Q .0523(c)]
To the extent that emissions trading is allowed under 15A NCAC 2D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 2Q .0523(c).

I.A. Reporting Requirements for Excess Emissions and Permit Deviations

[15A NCAC 2D .0535(f) and 2Q .0508(f)(2)]

“Excess Emissions” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 2D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 2Q .0700. *(Note: Definitions of excess emissions under 2D .1110 and 2D .1111 shall apply where defined by rule.)*

“Deviations” - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 2D .0535 as follows:
 - a. Pursuant to 15A NCAC 2D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
 - name and location of the facility;
 - nature and cause of the malfunction or breakdown;
 - time when the malfunction or breakdown is first observed;
 - expected duration; and
 - estimated rate of emissions;
 - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
 - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 2D .0535(f)(3).

Permit Deviations

3. Pursuant to 15A NCAC 2Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
 - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 2D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The

responsible official shall certify all deviations from permit requirements.

I.B. Other Requirements under 15A NCAC 2D .0535

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 2D .0535, including 15A NCAC 2D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 2D .0535(c)(1) through (7).
2. 15A NCAC 2D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

J. Emergency Provisions [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
 - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
 - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. Permit Renewal [15A NCAC 2Q .0508(e) and 2Q .0513(b)]

This permit is issued for a fixed term of five years for facilities subject to Title IV requirements and for a term not to exceed five years in the case of all other facilities. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 2Q .0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

L. Need to Halt or Reduce Activity Not a Defense [15A NCAC 2Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. Duty to Provide Information (submittal of information) [15A NCAC 2Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. Duty to Supplement [15A NCAC 2Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted

in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 2Q .0508(f) and 2Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 2Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification

shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent; and
4. the method(s) used for determining the compliance status of the source during the certification period.

Q. **Certification by Responsible Official** [15A NCAC 2Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 2Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
 - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
 - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - c. the applicable requirements under Title IV; or
 - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 2Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 2Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 2Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 2Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 2Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 2Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
 - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 2Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 2Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environment and Natural Resources. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 2Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 2Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 2Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 2Q .0107 and 2Q. 0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 2Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 2Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 2Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 2Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 2Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 2Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 2Q .0507(d)(3)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 2Q .0501(e)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 2Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **Prevention of Accidental Releases General Duty Clause - Section 112(r)(1) - FEDERALLY-ENFORCEABLE ONLY**

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

FF. **Title IV Allowances** [15A NCAC 2Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 2D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 2D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 2D .0200]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 2D .0202(b).

II. **Ambient Air Quality Standards** [15A NCAC 2D .0501(e)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 2D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 2Q .0508(i)(16)]

If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ in support of a permit application, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ and follow the procedures outlined below. The Permittee must request **in writing** and receive approval from the DAQ for an alternate test method or procedure.

1. The Permittee shall submit a completed Protocol Submittal Form to the DAQ Regional Supervisor at least 45 days prior to the scheduled test date. A copy of the Protocol Submittal Form may be obtained from the Regional Supervisor.
2. The Permittee shall notify the Regional Supervisor of the specific test dates at least 15 days prior to testing in order to afford the DAQ the opportunity to have an observer on-site during the sampling program.
3. During all sampling periods, the Permittee shall operate the emission source(s) under maximum normal operating conditions or alternative operating conditions as deemed appropriate by the Regional Supervisor or

his delegate.

4. The Permittee shall submit **two** copies of the test report to the DAQ. The test report shall contain at a minimum the following information:
 - a. a certification of the test results by sampling team leader and facility representative;
 - b. a summary of emissions results and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s);
 - c. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics should be included as necessary;
 - d. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
 - e. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 - f. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
5. The testing requirement(s) shall be considered satisfied only upon written approval of the test results by the DAQ.
6. The DAQ will review emission test results with respect exclusively to the specified testing objectives as proposed by the Permittee and approved by the DAQ. The use of the test results beyond the stated objectives remains subject to the approval of the DAQ.

KK. Reopening for Cause [15A NCAC 2Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
 - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 2Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 2Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 2Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 2Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

ATTACHMENT

List of Acronyms

AOS	Alternate Operating Scenario
BACT	Best Available Control Technology
Btu	British thermal unit
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CAA	Clean Air Act
DAQ	Division of Air Quality
DENR	Department of Environment and Natural Resources
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
OAH	Office of Administrative Hearings
PM	Particulate Matter
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
tpy	Tons Per Year
VOC	Volatile Organic Compound

PART II

SECTION 1: EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

Table 1 : The following table contains a summary of all emission sources and associated air pollution control devices and appurtenances associated with Air Quality Permit Application 9600058.06B:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-DPL	Dry-Ply line	n/a	n/a

These emission source(s) and/or control device(s) (ID No(s). ES-ES-DPL) are listed as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on January 5, 2007. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).

SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

The air emission source(s) and associated air pollution control device(s) and appurtenances listed in Section 1 are subject to the following specific terms, conditions, and limitations, including the monitoring, recordkeeping, and reporting requirements as specified herein:

1. Any air emission sources or control devices authorized to construct in Section 1 must be constructed and maintained in accordance with the provisions contained herein and operated in accordance with provisions contained in Part I of this permit. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A NCAC, Subchapter 2D .0958, .1806, and .1111.
2. **NOTIFICATION REQUIREMENT** - If the proposed operational date of January 1, 2007 is not met, a revised permit is not needed. However, within 15 days after the proposed operational date is not met, the Permittee shall notify in writing the Regional Supervisor of the new proposed operational date. Any existing equipment being replaced is permitted to operate in compliance until the replacement equipment is operational

SECTION 3: GENERAL CONDITIONS:

This section describes terms and conditions applicable to the construction of the air emission source(s) and associated air pollution control device(s) listed in Section 1 and State-only emission sources listed in Part I of the permit. Unless otherwise specified herein all references to the "permit" in this section apply only to Part II of the permit.

A. **Operating Conditions**

All operating conditions for the air emission source(s) and associated air pollution control device(s) listed in Section 1 are under Part I of this permit.

B. **General Provisions**

1. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new Air Quality Permit from the DAQ.
2. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of state law which have occurred prior to the issuance date of this permit.
3. A violation of any term or condition of Part II of this permit shall subject the Permittee to enforcement pursuant to NCGS 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.

C. **Submissions (reports, test data, monitoring data, notifications, and requests for renewal)**

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit.

D. **Part II Renewal Request**

The Permittee shall request renewal of the emission source(s) and associated air pollution control device(s) listed in Section 1 at the same time as specified in Part I, Section 3 - General Condition K of this permit.

E. **Annual Fee Payment**

The Permittee shall pay all fees in accordance with 15A NCAC 2Q .0200 and in conjunction with Part I, Section 3 - General Condition W of this Air Quality Permit.

F. **Reporting Requirements**

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:

1. changes in the information submitted in the application;
2. changes that modify equipment or processes; or
3. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

G. **Termination, Modification, and Revocation of the Permit**

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred; or
4. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

H. **Inspection and Entry**

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:

1. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
2. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
3. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

I. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.