

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**MEMORANDUM**

**July 17, 2006**

**TO:** Dawson Lasseter, P.E., Chief Engineer, Air Quality Division

**THROUGH:** Grover Campbell, P.E., Existing Source Permits Section

**THROUGH:** Phil Martin, P.E., New Source Permits Section

**THROUGH:** Peer Review

**FROM:** Eric L. Milligan, P.E., Engineering Section

**SUBJECT:** Evaluation of Permit Application No. **99-052-C (M-2) (PSD)**  
Weyerhaeuser Company  
Wright City Pine Lumber Mill  
Wright City, McCurtain County, Oklahoma  
Sec. 3 - T6S-R22E

**SECTION I. INTRODUCTION**

Weyerhaeuser operates a lumber sawmill (SIC 2421) in Southeast Oklahoma. The facility is a Part 70 source and is currently operating as authorized by Permit No. 99-052-TV (M-1). Weyerhaeuser submitted an application in order to perform certain upgrades to its softwood lumber operations summarized below:

- New motors, fans, and other components will be added to Kilns 3 and 4. Batch production times will be reduced, resulting in an increase in production for both kilns.
- Weyerhaeuser intends to upgrade the planer mill feed system and replace certain components on the 409 Planer Mill. Upgrades will also be made to the S6 Planer Mill. Additionally, the existing cyclone on the 409 Planer will be replaced with a newer high efficiency cyclone. Once upgrades to the S6 Planer Mill are complete, the 409 Planer Mill will be taken out of service, with certain components moved to the S6 Planer Mill. The changes to the planer mill system will increase its overall production and allow the mill to better utilize the increased capacity from the kiln upgrades.

Weyerhaeuser plans to start planer mill upgrades and the other upgrades to the Kiln system in July 2006. Estimated emission increases from the modification indicate that this project qualifies as a Prevention of Significant Deterioration (PSD) significant emission increase and a significant net emission increase for VOC. The projects will increase the mill capacity to 300 million board feet per year (MMBFY).

Based upon a July 2006 construction start date, the contemporaneous period for this project extends from July 1, 2003 to early 2007. Emission increases and decreases occurring at the mill during this window include the plywood expansion (2004) and hardwood and plywood mill shutdown (2005). Net emission changes for this project exceed the PSD Significant Emission Rate (SER) for VOC, thereby requiring additional review such as a Best Available Control Technology (BACT) analysis and ambient air quality analysis.

The applicant has also applied for and is awaiting issuance of their Part 70 source renewal permit. Along with the renewal the applicant had requested that the following modifications, which will also be incorporated into the construction permit, be incorporated into the operating permit:

- Clarification of the cyclone names and their requirements;
- Clarification of the chipper and it's location;
- Removal of the plywood presses and dryers and all related equipment and requirements;
- Removal of the hardwood sawing operation that was shut down in August of 2005;
- Addition of a 40-hp diesel engine for the bark washer that separates out log yard debris;
- Addition of a 1,000-gallon diesel tank; and
- Reducing the fuel tank monthly fuel throughput monitoring and recordkeeping to an annual requirement.

Prior to October of 2005, the mill produced plywood, hardwood lumber, and softwood (pine) lumber. The mill shut down hardwood lumber and plywood operations during August to October of 2005 and currently processes only softwood lumber. Byproducts include wood residuals (wood chips, shavings, sawdust, and bark). The shutdown of the plywood and hardwood operations has given the mill excess steam capacity from its power boiler. The mill intends to use this excess capacity to improve the competitive position of the mill in the softwood lumber market by upgrading the kilns and restoring the design capacity of the planer mill. A description of current facility operations is provided in Section II below.

## **SECTION II. DESCRIPTION OF MAJOR FACILITY PROCESSES**

The major processes at the Wright City Mill are:

- Log Merchandising
- Pine Sawmill Operations
- Pine Lumber Kilns
- Boiler Operations

**Log Merchandising**

All incoming logs to the Wright City Mill are received in the Pine Merchandising Area. In this area, the logs are unloaded, sorted, and stacked. The logs are debarked and cut to length prior to being sent to the sawmill. The bark from the debarkers is used as boiler fuel (hog fuel).

**Pine Sawmill Operations**

Merchandised pine logs are conveyed to the Pine Sawmill. The curve saw cuts various size dimension lumber from the logs. A Vertical Single Arbor (VSA) saw is used to cut small diameter logs into dimensional lumber. Larger size scrap pieces are sent to a chipper. All chips and sawdust are either sold or used as hog fuel in the boiler.

CNS side boards and a portion of the curve saw boards are edged at the edger optimizers. Scrap lumber edges are sent to a chipper. Trim saws are next employed to cut the boards to standard lengths. Sawdust is conveyed to the powerhouse and used as boiler fuel while the residual short end pieces are chipped. The standard length boards are next sorted, stacked and sent to steam-heated drying kilns (Pine Lumber Kilns)

**Pine Lumber Kilns**

After being processed in the Pine Sawmill, the pine lumber is dried in four steam-heated Pine Lumber Kilns. Following the Pine Lumber Kilns, the Planer mills process the pine lumber. At the Planer, a small amount of the lumber's surface is removed, producing finished lumber, shavings and chips. Shavings and dry lumber chips are pneumatically conveyed and are recovered by cyclones. These materials are either sold or used as hog fuel.

**Boiler Operations**

Steam used at the facility is produced by a wood-fired (hog fuel) boiler. As noted in the previous process descriptions, bark, sawdust, and shavings are used as hog fuel. Additional fuel sources include minor amounts of charred wood that may need to be re-burned and minor amounts of combustible facility trash and other residuals. The design capacity of the boiler is a continuous rate of 120,000 pounds per hour (lb/hr) of steam. Up to 138,000 lb/hr of steam may be generated for limited periods of time. The maximum short-term hourly firing rate for the boiler is 319.5 MMBTUH but the rated capacity is 240 MMBTUH. An ESP controls PM emissions from the boiler.

To begin the operations, hog fuel is conveyed or hauled to the hog fuel storage area. From the storage area, the hog fuel is conveyed into the burner of the boiler. Following combustion, the ash is conveyed to concrete bins for storage prior to being loaded into trucks for disposal or recycling. The steam produced by the boiler is used to heat the four pine lumber drying kilns, and in a five-megawatt generator.

**SECTION III. EQUIPMENT**

Emissions Unit Group (EUG) No. 1 was designated as the facility as a whole.

**EUG 2 – Debarkers**

EU	Point	EU Name/Model	Const. Date
H-HM-Dbrkr	H-HM-Dbrkr	Hardwood Merch Drum Debarker	1972
P-LO-Dbrkr	P-LO-Dbrkr	Pine Sawmill Knife Debarker <sup>1</sup>	1996

<sup>1</sup> - The Pine Sawmill Knife Debarker (EU P-LO-Dbrkr) was a reconstruction of a previously-existing unit. Therefore, it is not considered a new source.

**EUG 3 – Cyclones**

EU	Point	EU Name/Model	Const. Date <sup>1</sup>
H-HS-CYCLN	S-H-HS-CYCLN	Planer Large Trim Chipper w/Cyclone	1971/1997
P-LO-D223	S-P-P-LO-D223	223 Dry Chips From Planer Mill w/Cyclone	1971
P-LO-D230	S-P-LO-D230	230 Planer Shavings and Sawdust w/Cyclone	1971
P-LO-D231	S-P-LO-D231	231 Planer Shavings and Sawdust w/Cyclone <sup>2</sup>	1971
P-LO-D233	S-P-LO-D233	233 Planer Shavings and Sawdust w/Cyclone	1971/1982
P-LO-D233A	S-P-LO-D233A	233A Planer Shavings and Sawdust w/Cyclone	1971/1982

<sup>1</sup> - The dates shown in the table above that are after 1971 refer to the cyclones themselves and not the equipment served by the cyclones. Cyclone H-HS-CYCLN was added in 1997 to reduce emissions from the direct transfer of chips from the hardwood chipper to the chip receptacles. The equipment, which it serves, was in existence in 1971. Similarly, for the planer shavings handling system, the emissions units were in existence prior to 1971 but the cyclones were constructed at a later date. The applicability of air pollution control rules and regulations is based on construction date of the emissions unit rather than the air pollution controls.

<sup>2</sup> - S-P-LO-D231 will be replaced with a newer high efficiency cyclone.

**EUG 3A – Chipper**

EU	Point	EU Name/Model	Const. Date
Chipper 1	Fugitive	BK/Bruks Drum Chipper	2003

**EUG 3B – Pine Lumber Sawing<sup>1</sup>**

EU	Point	EU Name/Model	Const. Date
P-LO-G204	Cyclone 204	204 Lumber Mill Green Chips w/Cyclone	1971

<sup>1</sup> - This cyclone was separated into a unique EUG since it was affected by a later construction project and was previously subject to Permit No. 98-059-C (PSD).

**EUG 4 – Material Transfer Systems**

EU	Point	EU Name/Model	Const. Date
H-HM-Mtran	H-HM-Mtran	Hardwood Merchandiser Material Transfer	1972
P-MA-Mtran	P-MA-Mtran	Pine Merchandiser – Material Transfer	1971
P-LO-GMtrn	P-LO-GMtrn	Lumber Green End Material Transfer	1998
P-LO-DMtrn	P-LO-DMtrn	Lumber Dry End Material Transfer	1968
Prh-Mtrn	Prh-Mtrn	Powerhouse Material Transfer	1978

**EUG 5 – Material Storage Piles**

EU	Point	EU Name/Model	Const. Date
H-HM-BrkSP	Fugitive	Hardwood Area Bark Storage Pile	1972
P-MA-BrkSP	Fugitive	Pine Area Chip Storage Piles	1971
P-MA-BrkSP	Fugitive	Pine Area – Bark Storage Piles	1971
Prh-FuelSP	Fugitive	Powerhouse Area Hog Fuel Storage Pile	1978
Prh-AshSP	Fugitive	Ash Pile	1979

**EUG 6 – Hardwood Merchandiser Sawing**

EU	Point	EU Name/Model	Const. Date
H-HM-SAW	Fugitive	Hardwood Merchandiser	Pre-1972

**EUG 7 – Pine Merchandiser Sawing**

EU	Point	EU Name/Model	Const. Date
P-MA-SAW	Fugitive	Pine Merchandiser Sawing	2003

**EUG 8 – No. 1 Pine Lumber Kilns<sup>1</sup>**

EU	Point	EU Name/Model	Const. Date
P-LO-Gkil1	S-P-LO-Gkil1	Pine Lumber Kiln No. 1	1973
P-LO-Gkil2	S-P-LO-Gkil2	Pine Lumber Kiln No. 2	1974
P-LO-Gkil3	S-P-LO-Gkil3	Pine Lumber Kiln No. 3	1998
P-LO-Gkil4	P-LO-Gkil4	Pine Lumber Kiln No. 4	1980

<sup>1</sup> - The No. 3 Pine Lumber Kiln was constructed under Permit No. 94-157-O (PSD)(M-2), while the No. 4 Pine Lumber Kiln was constructed under Permit No. 94-157-O (PSD)(M-1). Kilns No. 1 and No. 2 were constructed without permits. Each lumber kiln was initially listed in its own separate EUG. However, since the facility requested a unit “cap” on lumber production, the four kilns have been combined into a single EUG.

**EUG 16 – Material Storage Bins**

EU	Point	EU Name/Model	Const. Date
P-LO-DPST1	P-LO-DPST1	Pine Lumber Dry End Planer Shavings Truck Bin #1	1982
P-LO-DPST2	P-LO-DPST2	Pine Lumber Dry End Planer Shavings Truck Bin #2	1992

**EUG 19 – Boiler**

EU	Point	EU Name/Model	Const. Date
Prh-Boiler	Prh – Boiler	240 MMBTUH Wood Fired <sup>1</sup>	1978

<sup>1</sup> - A gallon of diesel is used to start the fire from a cold startup.

**EUG 20 – Unpaved Roads**

EU	Point	EU Name/Model	Const. Date
PW-Road	Fugitive	Unpaved Roads	pre-1972

**EUG 21 – Tanks**

EU	Point	Contents	Capacity (Gallons)	Const. Date
Tank 4	Tank 4	Unleaded Gasoline	2,046	Unknown
Tank 5	Tank 5	Unleaded Gasoline	2,961	Unknown
Tank 6	Tank 6	Diesel	2,046	1971
Tank 10	Tank 10	Diesel	18,799	1971
Tank 11	Tank 11	Diesel	15,098	1971
Tank 12	Tank 12	Unleaded Gasoline	15,098	1972
Tank 21	Tank 21	Diesel	1,000	2005

**EUG 22 – Stationary Engines**

EU	EU Make/Model	HP	Serial #	Const. Date
North Engine	Cummins N-855-F	280	11189308	1999
South Engine	Cummins NT-280-IF	280	10225236	1972
Scale Generator	United Engines Model 5023-7101	50	2D-31299	Unknown
Bark Washer Diesel Generator	Ford Model 2722E	40	00298/624 LB	Unknown

**SECTION IV. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application and listed in OAC 252:100-8, Appendix I, are listed below. Recordkeeping for activities indicated with “\*” is listed in the Specific Conditions.

- \* Stationary reciprocating engines burning natural gas, gasoline, aircraft fuels, or diesel fuel, which are either used exclusively for emergency power generation or for peaking power service not exceeding 500 hours per year. The two emergency generators are in this category.
- Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). Various space heaters are in this category.
- Emissions from stationary internal combustion engines rated less than 50 HP output. The “Scale Generator” and “Bark Washer Diesel Engine” are in this category.

- \* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period. Tanks 4, 5, and 12 supply unleaded gasoline at a rate lower than 2,175 gallons per day.
- \* Storage tanks with less than or equal to 39,894 gallons capacity that store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature. The diesel tanks store a VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.
- Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. Welding is conducted at the facility and approximately 0.90 tons of electrodes were used in 1997. However, welding is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the specific conditions.
- Torch cutting and welding of under 200,000 tons of steel fabricated per year. Torch cutting and welding is conducted at the facility and approximately 12.7 tons of steel were purchased in 1997. However, torch cutting and welding is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the specific conditions.
- Hazardous waste and hazardous materials drum staging areas.
- Sanitary sewage collection and treatment facilities other than incinerators and Publicly Owned Treatment Works (POTW). Stacks or vents for sanitary sewer plumbing traps are also included (i.e., lift station).
- \* Surface coating operations that do not exceed a combined total usage of more than 60 gallons/month of coatings, thinners, and clean-up solvents at any one emissions unit. Facility maintenance operations are in this category.
- Exhaust systems for chemical, paint, and/or solvent storage rooms or cabinets, including hazardous waste satellite (accumulation) areas. Facility maintenance operations are in this category.
- \* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. This category includes the following operations:
  - Pine lumber green end sawing
  - Plant-wide: Babbit pot (small metal ingot melter)
  - Log temporary storage

**SECTION V. EMISSIONS**

There are 13 primary discharge points for process air emissions at the facility.

**CURRENT SIGNIFICANT DISCHARGE POINTS**

Discharge	Point	Height Feet	Diameter Inches	Temp. °F	Flow Rate ACFM
Boiler	S-Prh-Boiler	127	84	302	109,161
Rader Blower #199A	S-P-MA-199A	49	48	70	14,800
Rader Blower #204	S-P-LO-G204	49	48	70	11,250
Rader Blower #233A	S-P-LO-D233A	72	36	70	4,150
Rader Blower #223	S-P-LO-D233	27	36	70	1,865
Low Pressure Blower #230	S-P-LO-D230	77	86	70	27,000
Low Pressure Blower #231	S-P-LO-D231	74	73	70	41,000
Low Pressure Blower #232	S-P-LO-D232	66	86	70	38,000
Rader Blower #233	S-P-LO-D233	51	36	70	4,154
Pine Lumber Kiln #1	S-P-LO-GKil1	23	58	210	10,968
Pine Lumber Kiln #2	S-P-LO-GKil2	24	115	210	30,649
Pine Lumber Kiln #3	S-P-LO-GKil3	21	106	210	30,587
Pine Lumber Kiln #4	S-P-LO-GKil4	21	106	210	41,304

PM emissions from each cyclone are based on engineering estimates or vendor guarantees, as were debarker emissions. Storage tank VOC emissions were calculated using the EPA program, "TANKS3.1". Lumber kiln emissions are estimated from stack testing at other Weyerhaeuser locations (4.8 lb VOC per MBF and 0.27 lb PM per MBF); given the number of openings in the Wright City kilns, stack testing on them is not feasible. Emissions from stationary engines are based on factors in AP-42 (10/96), Section 3.3, assuming 500 hours per year operations except for the Bark Washer which was based on 4,300 hours.

Boiler emissions were calculated using stack testing results to calculate unit-specific emissions factors (0.181 lb/MMBTU NO<sub>x</sub>, 0.029 lb/MMBTU PM, 0.144 lb/MMBTU CO, and 0.003 lb/MMBTU VOC); and AP-42 (2/99), Section 1.6, for SO<sub>2</sub> emissions (0.022 lb/MMBTU, using the upper end of the range listed). Storage pile emissions were assumed to be negligible since the wood-waste materials stored are high-moisture and non-brittle, except for the ash pile; ash pile emissions are based on AP-42 (1/95), Section 13.2.4.

**EUG 2 – Debarkers**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	TPY	TPY	TPY
Hardwood Merch Drum Debarker	H-HM-Dbrkr	0.08	0.35		
Pine Sawmill Knife Debarker	P-LO-Dbrkr	0.08	0.35	0.79	2.22
<b>Totals</b>		<b>0.16</b>	<b>0.70</b>	<b>0.79</b>	<b>2.22</b>

<sup>1</sup> - VOC as VOC



**EUG 3 – Cyclones**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	TPY	lb/hr	TPY
Planer Large Trim Chipper w/Cyclone	S-H-HS-CYCLN	0.03	0.05	0.14	0.27
223 Dry Chips From Planer Mill w/Cyclone	S-P-P-LO-D223	0.90	2.64	0.25	0.53
230 Planer Shavings and Sawdust w/Cyclone	S-P-LO-D230	3.80	10.42	1.52	3.60
231 Planer Shavings and Sawdust w/Cyclone <sup>2</sup>	S-P-LO-D231	1.63	5.14	0.00	0.00
233 Planer Shavings and Sawdust w/Cyclone	S-P-LO-D233	2.71	6.11	0.76	0.11
233A Planer Shavings and Sawdust w/Cyclone	S-P-LO-D233A	3.50	15.31	0.76	2.74
<b>Totals</b>		<b>12.57</b>	<b>39.67</b>	<b>3.43</b>	<b>7.25</b>

<sup>1</sup> - VOC as VOC; <sup>2</sup> - To Be Removed

**EUG 3A – Chipper**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	TPY	lb/hr	TPY
Chipper 1	Fugitive	0.18	0.67	1.67	8.13

<sup>1</sup> - VOC as VOC

**EUG 3B – Pine Lumber Sawing**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	TPY	lb/hr	TPY
204 Lumber Mill Green Chips w/Cyclone	Cyclone 204	0.91	4.00	9.33	20.28

<sup>1</sup> - VOC as VOC

**EUG 4 – Material Transfer Systems**

EU Name/Model	Point	PM <sub>10</sub>	
		lb/hr	TPY
Hardwood Merchandiser Material Transfer	H-HM-Mtran	0.13	0.16
Pine Merchandiser – Material Transfer	P-MA-Mtran	0.18	0.44
Lumber Green End Material Transfer	P-LO-GMtrn	0.03	0.12
Lumber Dry End Material Transfer	P-LO-DMtrn	0.01	0.01
Powerhouse Material Transfer	Prh-Mtrn	0.02	0.08
<b>Totals</b>		<b>0.37</b>	<b>0.81</b>

**EUG 5 – Material Storage Piles**

EU Name/Model	Point	PM <sub>10</sub>	
		lb/hr	TPY
Hardwood Area Bark Storage Pile	Fugitive	0.01	0.01
Hardwood Area Chips Storage Piles	Fugitive	0.01	0.01
Pine Area Chip Storage Piles	Fugitive	0.01	0.02
Pine Area – Bark Storage Piles	Fugitive	0.01	0.02
Powerhouse Area Hog Fuel Storage Pile	Fugitive	0.01	0.02
Ash Pile	Fugitive	1.02	4.46
<b>Totals</b>		<b>1.07</b>	<b>4.54</b>

**EUG 6 – Hardwood Merchandiser Sawing**

EU Name/Model	Point	PM <sub>10</sub>	
		lb/hr	TPY
Hardwood Merchandiser	Fugitive	0.01	0.01

**EUG 7 – Pine Merchandiser Sawing**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	lb/hr	TPY	TPY
Pine Merchandiser Sawing	Fugitive	0.01	0.01	2.54	4.56

<sup>1</sup> - VOC as VOC

**EUG 8 – Pine Lumber Kilns**

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/day	TPY	lb/day	TPY
Pine Lumber Kiln No. 1	S-P-LO-Gkil1	66.14	12.07	1,175.51	214.53
Pine Lumber Kiln No. 2	S-P-LO-Gkil2	37.81	6.90	671.89	122.62
Pine Lumber Kiln No. 3	S-P-LO-Gkil3	62.63	11.43	1,113.70	203.25
Pine Lumber Kiln No. 4	S-P-LO-Gkil4	55.51	10.13	986.80	180.09
<b>Totals</b>		<b>222.09</b>	<b>40.53</b>	<b>3,947.9</b>	<b>720.49</b>

<sup>1</sup> - VOC as VOC

**EUG 16 – Material Storage Bins**

EU Name/Model	Point	PM <sub>10</sub>		VOC	
		lb/hr	TPY	lb/hr	TPY
Pine Lumber Dry End Planer Shavings Truck Bin #1	P-LO-DPST1	0.01	0.01	0.30	1.42
Pine Lumber Dry End Planer Shavings Truck Bin #2	P-LO-DPST2	0.01	0.01	0.30	1.42
<b>Totals</b>		<b>0.02</b>	<b>0.02</b>	<b>0.60</b>	<b>2.84</b>

**EUG 19 - Boiler<sup>2</sup>**

EU Name/Model	Point	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		VOC <sup>1</sup>		CO	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Wood-Fired Boiler	Prh-Boiler	9.27	30.48	7.03	23.13	57.83	190.27	0.96	3.15	46.01	151.37

<sup>1</sup> - VOC as VOC

<sup>2</sup> - Hourly emissions are based on the short-term capacity of this unit, 319.5 MMBTUH, while annual emissions are based on the rated capacity, 240 MMBTUH.

**EUG 20 – Unpaved Roads**

EU Name/Model	Point	PM <sub>10</sub>	
		lb/hr	TPY
Unpaved Roads	Fugitive	4.12	18.10

**EUG 21 - Tanks**

EU	Point	Contents	VOC <sup>1</sup>
			TPY
Tank 4	Tank 4	Unleaded Gasoline	0.83
Tank 5	Tank 5	Unleaded Gasoline	0.14
Tank 6	Tank 6	Diesel	0.36
Tank 10	Tank 10	Diesel	2.38
Tank 11	Tank 11	Diesel	0.61
Tank 12	Tank 12	Unleaded Gasoline	0.68
Tank 21	Tank 21	Diesel	0.18
<b>Totals</b>			<b>5.18</b>

<sup>1</sup> - VOC as VOC

**EUG 22 – Stationary Engines**

EU Make/Model	Unit ID	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		VOC		CO	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Cummins N-855-F	South	0.62	0.15	0.57	0.14	8.68	2.17	0.69	0.17	1.87	0.47
Cummins NT-280-II	North	0.62	0.15	0.57	0.14	8.68	2.17	0.69	0.17	1.87	0.47
United 5023-7101	Gen	0.11	0.03	0.10	0.03	1.55	0.39	0.12	0.03	0.33	0.08
Ford 2722E	Bark	0.09	0.19	0.08	0.19	1.24	2.67	0.10	0.21	0.27	0.57
<b>Totals</b>		<b>1.44</b>	<b>0.52</b>	<b>1.32</b>	<b>0.50</b>	<b>20.15</b>	<b>7.40</b>	<b>1.60</b>	<b>0.58</b>	<b>4.34</b>	<b>1.59</b>

**FACILITY-WIDE AIR EMISSIONS**

**A. CRITERIA POLLUTANT EMISSIONS**

EUG	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		VOC		CO	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
2 - Debarkers	0.16	0.70	--	--	--	--	0.79	2.22	--	--
3 - Cyclones	12.57	39.67	--	--	--	--	3.43	7.25	--	--
3A - Chipper	0.18	0.67	--	--	--	--	1.67	8.13	--	--
3B - Pine Lumber Sawing	0.91	4.00	--	--	--	--	9.33	20.28	--	--
4 - Material Transfer Systems	0.37	0.81	--	--	--	--	--	--	--	--
5- Material Storage Piles	1.07	4.54	--	--	--	--	--	--	--	--
7 - Pine Merchandiser Sawing	0.01	0.01	--	--	--	--	2.54	4.56	--	--
8 - Pine Lumber Kilns	9.13	39.96	--	--	--	--	164.50	720.49	--	--
16 - Material Storage Bins	0.02	0.02	--	--	--	--	0.60	2.84	--	--
19 - Wood-Fired Boiler	9.27	30.48	7.03	23.13	57.83	190.27	0.96	3.15	46.01	151.37
20 - Unpaved Roads	4.12	18.10	--	--	--	--	--	--	--	--
21 - Tanks	--	--	--	--	--	--	1.18	5.18	--	--
22 - Stationary Engines	1.44	0.52	1.32	0.50	20.15	7.40	1.60	0.58	4.34	1.59
<b>TOTALS</b>	<b>39.25</b>	<b>139.5</b>	<b>8.35</b>	<b>23.63</b>	<b>77.98</b>	<b>197.7</b>	<b>186.6</b>	<b>774.7</b>	<b>50.35</b>	<b>153.0</b>

**B. HAP EMISSIONS**

HAP	C A S Number	Emissions	
		lb/hr	TPY
Acetaldehyde	75070	0.94	3.83
Acrolein	107028	1.28	4.20
Arsenic	7440382	<0.01	<0.01
Benzene	71432	1.34	4.42
Cadmium	7440439	<0.01	<0.01
Chlorine		0.25	0.83
Formaldehyde	50000	1.74	6.11
HCl	7647010	6.07	19.97
Hexaldehyde		0.07	0.30
Lead	7439921	0.01	0.05
Manganese	7439965	0.51	1.68
Methanol	67561	1.69	7.40
Methyl Ethyl Ketone	78933	0.34	1.48
Nickel	7440020	0.01	0.04
Styrene	100425	0.61	2.00
Toluene	108883	0.29	0.97
Xylenes	1330207	0.01	0.03
<b>Totals</b>		<b>15.18</b>	<b>53.33</b>

**SECTION VI. PSD REVIEW**

Pollutant	Project Emission Increases (TPY) <sup>1</sup>	PSD Significant Emissions Rate (TPY)	PSD Netting Required?
NO <sub>x</sub>	4.96	40	No
SO <sub>2</sub>	0.34	40	No
CO	3.03	100	No
VOC	156.41	40	Yes
PM <sub>10</sub>	24.12	15	Yes
PM	28.34	25	Yes
TRS	--	10	No
H <sub>2</sub> S	--	10	No
SAM	--	7	No
Lead	0.01	0.6	No

TRS - Total Reduced Sulfur, H<sub>2</sub>S - Hydrogen Sulfide, SAM - Sulfuric Acid Mist

<sup>1</sup> - Based on Actual to future potential for all modified emission units.

**A. Netting Calculations**

The first part of the kiln upgrade modifications is expected to begin on July 1, 2006, with the modifications to Kiln 3 and 4. The contemporaneous period therefore starts on July 1, 2003 and extends until the start of operations of the proposed project, which is expected in early 2007. As a result, the contemporaneous period covers the years between 2003 and 2007. Aside from the project itself, emission changes that occurred during this period include the plywood expansion (2004) and plywood and hardwood mill shutdown (2005).

Creditable emission increases are those that have not been relied upon in a previous PSD ambient air modeling evaluation. The plywood expansion (2004), as described in Permit No. 99-052-C (M-1), was considered a PSD minor modification and therefore was not relied upon in issuance of a PSD permit.

Creditable emission decreases are those that are federally enforceable and were from an emission unit that has been (or will be) physically removed. In addition to those units involved in the hardwood and plywood mill shutdown, other units such as the 409 planer mill will be removed as part of this project. Creditable emission increases and decreases from the project itself are summarized below. Emissions from these contemporaneous projects were detailed in the application.

**Creditable Emission Changes (TPY)**

<b>Year</b>	<b>Project</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>VOC</b>
2003	(no projects)	----	----	----
2004	Plywood Expansion	15.08	15.01	79.04
2005	Plywood & Hardwood Shutdown	-39.41	-39.34	-155.92
2006	Kiln & Planer Mill Upgrade	22.54	6.31	156.08
2007	(no projects)	----	----	----
	<b>Net Emission Increase/Decreases</b>	<b>-1.79</b>	<b>-18.02</b>	<b>79.20</b>
	<b>PSD Significance Emission Rate</b>	<b>25.00</b>	<b>15.00</b>	<b>40.00</b>
	<b>Does it exceed the SER?</b>	<b>No</b>	<b>No</b>	<b>Yes</b>

**B. Best Available Control Technology (BACT)**

A BACT analysis is required for each new or physically modified emissions unit for each pollutant that exceeds an applicable PSD SER. Since there is a significant net emission increase in VOC emissions from the proposed modification, a BACT analysis is required for VOC emissions from the proposed modifications to the lumber kilns and planer mill.

BACT is defined in the PSD regulations as:

*“... an emission limitation based on the maximum degree of reduction for each pollutant subject to regulation under the Act which would be emitted from any... source...which on a case-by-case basis is determined to be achievable taking into account energy, environmental and economic impacts and other costs.”*

#### “Top-Down” Analysis

In a memorandum dated December 1, 1987, the U.S. EPA stated its preference for a “top-down” analysis. After determining if any New Source Performance Standards (NSPS) are applicable, the first step in this approach is to determine, for the emission unit in question, the most stringent control available for a similar or identical source or source category. If it can be shown that this level of control is technically infeasible for the emission unit in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical or environmental concerns. The remaining technologies are evaluated on the basis of operational and economic effectiveness. Presented below are the five basic steps of a top-down BACT review procedure as identified by the U.S. EPA in the March 15, 1990, Draft BACT Guidelines:

- Step 1. Identify all control technologies
- Step 2. Eliminate technically infeasible options
- Step 3. Rank remaining control technologies by control effectiveness
- Step 4. Evaluate most effective controls and document results
- Step 5. Select BACT

The U.S. EPA has consistently interpreted the statutory and regulatory BACT definition as containing two core requirements that the agency believes must be met by any BACT determination, regardless of whether or not the “top-down” approach is used. First, the BACT analysis must include consideration of the most stringent available technologies, i.e., those which provide the “maximum degree of emissions reduction.” Second, any decision to require a lesser degree of emissions reduction must be justified by an objective analysis of “energy, environmental, and economic impacts.”

Potentially applicable emission control technologies were identified by researching the U.S. EPA control technology database, technical literature, and control equipment vendor information and by using process knowledge and engineering experience. The RACT/BACT/LAER Clearinghouse (RBLC), a database made available to the public through the U.S. EPA’s Office of Air Quality Planning and Standards (OAQPS) Technology Transfer Network (TTN), lists technologies that have been approved in PSD permits as BACT for numerous process units. Process units in the database are grouped into categories by industry.

A search of the RBLC database was performed to identify the emission control technologies and emission levels that were determined by permitting authorities as BACT for the wood products industry (Process Code 30.000 in the RBLC system). The search included the current database containing all RBLC entries since January 1996. The results of the search indicate that no feasible control technologies have been developed or implemented to control VOC emissions from the lumber drying kilns. No entries of a planer mill were found in the RBLC database, suggesting that such a unit had not been examined in a BACT analysis.

#### Emission Limit Selection

If a source is subject to an NSPS, the minimum control efficiency to be considered in a BACT analysis must result in an emission rate less than or equal to the NSPS emission rate. In other words, the applicable NSPS limit represents the maximum allowable emission limit for an emission source. There are no NSPS for either lumber drying kilns or the planer mill.

BACT requirements only apply to the pollutants that are subject to PSD review and the emission units that are newly installed or physically modified. Thus, a BACT review is required for VOC emissions from the planer mill and the two kilns undergoing upgrades.

#### 1. Lumber Kiln BACT Analysis

VOC emissions result from the drying of green, moisture-laden lumber with heat over a period of time (i.e., the drying cycle). Steam from the boilers is used to heat the air in the kilns. The air is circulated through the lumber with the aid of several axial flow fans located along the center of the kilns. Vents in the roof of the kilns are designed to vent moisture-laden air and to maintain the desired wet bulb temperature within the kilns.

The drying time for a single cycle can vary from 14 to 24 hours for high-temperature kilns (including loading and unloading). VOC emissions vary considerably over the kiln cycle, from insignificant amounts during loading and unloading and at varying rates during the drying phase. There will be very few emissions when the kilns are being heated because the exhaust vents will be closed. Once the exhaust vents open, VOC emissions, concentrations, and flow rates will vary with the exhaust flow.

Efforts by the wood products industry to accurately test and quantify potential VOC emissions from lumber drying kilns have proven difficult. The kiln exhaust, which is best characterized as a fugitive emission, exits from the multiple vents and openings in the roof of the kiln and also through cracks and seams in the structure (e.g., the doors, etc.).

Due to the difficulty involved with capturing VOC emissions and the cyclically varying nature of the emissions (a batch process with variable emissions throughout the drying cycle), feasible add-on control devices for effective VOC removal have not been identified. In addition, no variations in the method of operation of drying kilns have been identified that could result in the minimization of VOC emissions.

Attempts to direct the kiln vent air flows to a VOC control device would disrupt the necessary ventilation and circulation patterns required to maintain the proper moisture content and temperature during the various drying cycle stages. Potential backpressure from a control device or a vacuum generated by a blower would disrupt the controlled drying environment and adversely affect the lumber product quality.

Based on the RBLC search, the technical infeasibility of control devices, and surveys of other state agency BACT determinations, operation of the proposed lumber kilns without VOC controls is proposed as BACT. However, the following information is presented to satisfy the U.S. EPA's requirement for a "top-down" BACT analysis.

#### Identify NSPS Emission Limits

Control technologies considered in the BACT analysis must control emissions to levels that meet applicable NSPS to be considered viable. Thus, the first step in the BACT analysis is to review applicable NSPS emission limits. No NSPS have been promulgated for lumber drying kilns.

#### **Step 1. Identify All Control Technologies**

The first of the five steps in the top-down BACT analysis procedure is to identify possible control technologies. Information on the various control devices comes from technical journals and industry experience and represents a comprehensive, reasonable listing of control devices for this process.

As indicated previously, no controls have been determined to be feasible for lumber drying kilns. In the absence of relevant or applicable past BACT cases in the RBLC database, potentially applicable VOC control technologies for the drying kilns were identified based on the principles of control technology and engineering experience. The candidate control options are listed below.

- Condensation
- Thermal oxidation
- Catalytic oxidation
- Carbon adsorption
- Wet Scrubbing
- Biofiltration

These control technologies are briefly described in the following paragraphs.

#### Condensation

VOC emissions are condensed and removed by chilling the exhaust gases.



### Thermal Oxidation

VOC is oxidized to carbon dioxide (CO<sub>2</sub>) and water vapor (H<sub>2</sub>O) at a high temperature (generally at least 300°F higher than a representative autoignition temperature of the VOC) with a residence time between one-half second and one second. Thermal oxidizers can be designed as conventional thermal units, recuperative units, or regenerative thermal oxidizers (RTOs). A conventional thermal oxidizer does not have heat recovery capability. Therefore, the fuel cost is extremely high and is not suitable for high volume flow applications. In a recuperative unit, the contaminated inlet air is preheated by the combustion exhaust gas stream through a heat exchanger. An RTO can achieve a heat recovery higher than a recuperative oxidizer. It is common now to design an RTO with a thermal recovery efficiency of 95%. RTOs are commonly used to control VOC emissions in high-volume gas streams.

An RTO generally consists of at least two chambers packed with ceramic media. The VOC-laden gas enters one hot ceramic bed where the gas is heated to the desired combustion temperature. Auxiliary fuel may be required in this stage, depending on the heating value of the inlet gas. The gas then passes through the other ceramic bed, where the heat released from combustion is recovered and stored in the bed. The process flow then is switched so that the polluted gas is preheated by the ceramic bed. The system is operated in an alternating cycle, recovering up to 95% of the thermal energy during normal operation.

### Catalytic Oxidation

Similar to an RTO, a regenerative catalytic oxidizer (RCO) oxidizes VOC to CO<sub>2</sub> and H<sub>2</sub>O. However, an RCO uses catalysts to lower the activation energy required for the oxidation so that the oxidation can be accomplished at a lower temperature than in an RTO. As a result, the necessity for auxiliary fuel is lower than for an RTO.

### Carbon Adsorption

Carbon adsorption systems can potentially be used to remove VOC from exhaust gas streams. The core component of a carbon adsorption system is an activated carbon bed contained in a steel vessel. The VOC-laden gas passes through the carbon bed where the VOC is adsorbed on the activated carbon. The cleaned gas is discharged to the atmosphere. The spent carbon is regenerated either at an on-site regeneration facility or by an off-site activated carbon supplier. Spent carbon is regenerated by using steam to displace adsorbed organic compounds at high temperatures.

### Wet Scrubbing

Scrubbing of gas or vapor pollutants from a gas stream is usually accomplished in a packed column (or other type of column) where pollutants are absorbed by counter-current flow of a scrubbing liquid. Scrubbing liquid can be water, caustic solution, or other liquid media.

### Biofiltration

Biofiltration is a relatively recent air pollution control technology in which off-gases containing biodegradable organic compounds are vented, under controlled temperature and humidity through a special filter material containing microorganisms. As exhaust gases pass through the biofilter, VOC is absorbed on the filter material, and the microorganisms break down the compounds and transform them into CO<sub>2</sub> and H<sub>2</sub>O with varying efficiency.

### **Step 2. Elimination of Technically Infeasible Control Options**

All control technologies identified in this section are technically infeasible for application to the proposed drying kiln exhaust streams. Reasons for eliminating each technology are identified below.

### Condensation

Condensation is only effective when the emissions can be cooled to a temperature where the vapor pressure of the emissions is less than the VOC concentration. To reduce the vapor pressure of terpenes, the primary constituent of lumber kiln emissions, 100 ppm as compound (1,000 ppm as carbon), the temperature would need to be reduced to -40°F. At this temperature, the unit would plug up with ice from the water vapor. This VOC removal technology is clearly not practical for lumber kilns.

### Thermal Oxidation and Catalytic Oxidation

Due to the similarities between the two processes, technical feasibility issues for RTO and RCO will be addressed together here.

Several factors make the use of RTO and RCO units technically infeasible for controlling VOC emissions from lumber kilns. First, the installation of emissions collection equipment can affect the quality of the lumber product by disrupting the necessary ventilation and circulation patterns required to maintain the proper moisture content and temperature during the various drying cycle stages. Potential backpressure from a blower-generated vacuum would disrupt the controlled drying environment and adversely affect the lumber product quality.

Auxiliary fuel will be required to heat the ceramic bed to the desired combustion temperature. Because large amounts of fuel are initially required to heat the ceramic beds, the efficiency of the beds relies upon consistent processing characteristics. Oxidation is best suited to applications where the gas stream has a consistent flow rate and concentration. Cyclic operations with variable emissions, such as the drying cycle in a lumber drying kiln, are generally not compatible with oxidation, since absorbed heat is lost during periods of inactivity.

Finally, the combustion of natural gas as an auxiliary fuel would increase NO<sub>x</sub> emissions. The creation of NO<sub>x</sub> emissions simply to reduce VOC emissions would be unacceptable, as it would increase the potential of ambient ozone formation.

Carbon Adsorption

Several factors hinder the implementation of carbon adsorption on lumber kiln exhaust gases. First, carbon adsorption is not recommended for exhaust streams with fifty percent relative humidity or higher and temperatures above 150°F. Water vapor preferentially condenses on the activated carbon above a relative humidity of about fifty percent, substantially reducing the efficiency and overall effectiveness of the adsorbent. Furthermore, the emission temperatures are much too high for activated carbon. The emission temperatures are in the range normally used to desorb VOC from the carbon.

Wet Scrubbing

Biofiltration

**Step 3. Rank Remaining Control Technologies by Control Effectiveness**

The third of the five steps in the top-down BACT analysis procedure is to rank remaining control technologies by control effectiveness. Since all control technologies are eliminated as technically infeasible in the preceding section, no controls are indicated for the control of VOC emissions from lumber kilns. This determination is consistent with all other BACT determinations in the RBLC.

**Step 4. Evaluate Most Effective Controls and Document Results**

Since no technically feasible VOC controls are indicated for lumber kilns, this section documents the BACT determinations for lumber kilns found in the RBLC database search.

The RBLC database search identified the emission control technologies and emission levels that were determined by permitting authorities as BACT for the wood products industry (Process Code 30.000 in the RBLC system). The search included the current database containing all RBLC entries since January 1996. The search results indicate that no feasible control technologies have been developed or implemented to control VOC emissions from lumber drying kilns. The results of the search are shown below.

**Recent RBLC Entries for Lumber Kiln VOC Emissions**

<b>Company</b>	<b>Location</b>	<b>Permit Date</b>	<b>VOC Limit (lb/MBF)</b>
Potlatch Corporation	Prescott, AR	06/26/2005	3.5
Elliot Sawmilling Company	Crocketville, SC	05/23/2004	4.5
New South Lumber	Conway, SC	09/04/2003	4.2
Bowater, Inc.	Albertville, AL	06/04/2003	7.0
West Frazer (South), Inc.	Huttig, AR	11/07/2002	3.5
International Paper	Morton, MS	09/05/2001	5.2

The variation in emission rates among the entries in the database can be explained by several factors. First, VOC emission rates from lumber kilns vary throughout the year because the VOC content of lumber varies throughout the year with changes in temperature and moisture content. In addition, state agencies have varying requirements regarding characterization of VOC emissions. Facilities located in Arkansas have the lowest listed emission limits because the Arkansas DEQ requires that VOC emissions be listed on an “as-Carbon” basis, while others require VOC emissions be listed as terpene, propane, or as methanol. Emissions from the Wright City lumber kilns are based on an “as-VOC” basis based on a best estimate of actual speciated compounds.

### **Step 5. Select BACT**

Based on the search of the RBLC, the technical infeasibility of control devices, and surveys of other state agency BACT determinations, operation of the proposed lumber kiln without VOC controls is proposed as BACT. Weyerhaeuser proposes a VOC BACT emission limit of 4.8 lb/MBF for the Wright City Mill drying kilns. While this emission rate is not the lowest of the limits listed in the RBLC database, it is a conservative-high estimate of VOC emissions from the Wright City Mill kilns and falls well within the average range of BACT limits.

#### **2. Planer Mill BACT Analysis**

After being processed by the lumber kilns, pine lumber is stacked and organized while awaiting planing. Unlike the lumber kiln, the planer mill operation is much more accurately characterized as a continuous and not a batch process. Planer mills are sources of VOC emissions, typically in very small quantities. Further, these VOC emissions are more accurately characterized as fugitive emissions from the pine lumber itself (after leaving the planer mill) as opposed to being directly tied to the actual planing process.

Capturing VOC emissions from such an operation can be characterized as being technically infeasible. As described above, very few of the VOC emissions are actually released from the actual planing activity. Planer mills are not large sources of VOC since the bulk of such emissions are released in the lumber kiln. VOC emissions that are attributed to the planing operation are minimal and are primarily generated as standing losses from the pine lumber itself while awaiting planing. In the case of the Wright City Mill, the planer mills are not expected to have a PTE of more than 3 TPY VOC. Regardless of what \$/ton economic feasibility threshold is established, it would be necessary to accomplish effective VOC controls with a prohibitively small budget given the amount of VOC that could be potentially controlled.

As previously mentioned, an RBLC search yielded no entries of a planer mill in the database. Based on these results (or lack thereof) of the RBLC search and the economic infeasibility of the VOC capture system required for most relevant control devices, operation of the S6 planer mill using best management practices is proposed as BACT. However, the following information is presented to satisfy the U.S. EPA’s requirement for a “top-down” BACT analysis.

### Identify NSPS Emission Limits

Control technologies considered in the BACT analysis must control emissions to levels that meet applicable NSPS to be considered viable. Thus, the first step in the BACT analysis is to review applicable NSPS emission limits. No NSPS have been promulgated for planer mill operations.

### **Step 1. Identify All Control Technologies**

The first of the five steps in the top-down BACT analysis procedure is to identify possible control technologies. Information on the various control devices comes from technical journals and industry experience and represents a comprehensive, reasonable listing of control devices for this process.

As indicated previously, no controls have been determined to be feasible for planer mills. In the absence of relevant or applicable past BACT cases in the RBLC database, potentially applicable VOC control technologies for the planer mill were identified based on the principles of control technology and engineering experience. The candidate control options are listed below:

- Condensation
- Thermal oxidation
- Catalytic oxidation
- Carbon adsorption

A brief description of these technologies was previously and is not repeated here.

### **Step 2. Elimination of Technically Infeasible Control Options**

Each of the options discussed above will require a VOC capture system. None of the control technologies described above have been implemented with a planer mill, making their effectiveness in controlling VOC emissions in such an application difficult to evaluate. As mentioned above, the distributed nature of the VOC emissions from the planer mill operation make such a task technically infeasible. As a result, these technologies, which require some form of VOC vapor capture, are nominally considered to be technically infeasible.

### **Step 3. Rank Remaining Control Technologies by Control Effectiveness**

The third of the five steps in the top-down BACT analysis procedure is to rank remaining control technologies by control effectiveness. Since all control technologies are eliminated as technically infeasible in the preceding section, best management practices are indicated for the control of VOC emissions from planer mill.

### **Step 4. Evaluate Most Effective Controls and Document Results**

No technically feasible VOC controls are indicated for the planer mill and no BACT determinations for planer mills was found in the RBLC database search.

**Step 5. Select BACT**

Based on the search of the RBLC, the technical infeasibility of control devices, and surveys of other state agency BACT determinations, operation of the S6 planer mill without VOC controls is proposed as BACT.

**C. Ambient Air Quality Impact Analysis**

The PSD review for the kiln modifications requires an air quality analysis to determine the ambient impacts associated with the proposed modifications. Since there is a significant net emission increase of VOC emissions, an air quality analysis is required to demonstrate that emissions of VOC will not cause or contribute to a violation of the NAAQS.

As part of the PSD review process, an ambient impact analysis must be conducted to demonstrate that either (1) the increase in emissions will have impacts that are below established PSD Modeling Significance Levels (MSL), or (2) the total emissions from the facility, and other nearby sources, will not contribute to a violation of the NAAQS. However, there are no established NAAQS for VOC. Instead, VOC is regulated by the U.S. EPA as a precursor to the formation of tropospheric ozone. Thus, an ambient air quality analysis is performed to demonstrate that VOC emissions from the Wright City Mill will not cause or contribute to a violation of the ozone NAAQS. A full impact analysis is performed in lieu of a significance analysis since there is no PSD MSL established for ozone.

To demonstrate compliance with the ozone NAAQS in this permit action, the screening procedure described in the 1988 U.S. EPA paper entitled "VOC/NO<sub>x</sub> Point Source Screening Tables" is utilized. This paper, shown in Appendix C, was presented at the 82<sup>nd</sup> Annual Meeting and Exhibition of the Air and Waste Management Association in June 1989. The screening methodology is referred to as the Scheffe method. This method, named for the originating author and researcher, provides a means by which an ozone impact can be estimated through the use of a series of look-up tables. These look-up tables are based on a series of applications of the Reactive Plume Model, a Lagrangian-based photochemical model. The ozone estimates produced from this analysis can be interpreted as conservative predictions that would exceed ozone formation produced by actual episodic events.

U.S. EPA Region VI has previously approved the use of the Scheffe method in PSD permitting projects within the range of applicability defined in the paper. Since the screening procedures were developed to calculate the ozone increment impacts from VOC dominated point sources, the valid range of application includes facilities with total VOC emissions that are greater than 25 TPY and the total NO<sub>x</sub> emissions from the same facility. Both of these are true for the Wright City Mill.

The Scheffe method was developed as a screening tool for “grass-roots” or “green field” plants. Thus, to determine the modeled ambient impact, two cases must be analyzed. The current operating scenario is the base case. For the proposed modification, the whole plant must be analyzed with the post-modification scenario, and the difference between the two results is the expected maximum ambient impact. This technique more appropriately determines whether ozone generation near the facility is NO<sub>x</sub> limited or VOC limited. The Scheffe method conservatively predicts the ambient ozone impact based on long-term VOC and NO<sub>x</sub> emissions from a stationary source. The results in the look-up tables generated are a function of these emissions.

The Scheffe method look-up tables are provided for both rural and urban settings to account for the differences in atmospheric background chemistry in each type of area. The Wright City Mill is located in an area that can be classified as “rural” based on the Auer land analysis tables. Therefore, rural coefficients were used in the screening analysis.

1. NMOC Emission Rates

Base Case

Facility-wide emissions of NO<sub>x</sub> and NMOC for CY2004-05 were used to calculate the base case scenario past actual averages and are included. Past actual facility-wide average emissions of NMOC and NO<sub>x</sub> are 599 TPY and 131 TPY, respectively.

Post-Modification Case

The netting analysis accounts for the increase in NMOC potential from the kilns and planer mill as well as the expected emission increases from associated emission units. NO<sub>x</sub> increases as a result of this project are attributable to the marginal increase in steam boiler utilization. These totals are added to the base case scenario NMOC and NO<sub>x</sub> emissions from the facility, resulting in post-modification NMOC and NO<sub>x</sub> emission rates of 663 TPY and 136 TPY, respectively.

2. NMOC/NO<sub>x</sub> Ratio

The results of the Scheffe method are a function of the ratio of NMOC to NO<sub>x</sub> emissions from the facility. For purposes of determining this ratio, annual emission rates of NMOC and NO<sub>x</sub> are used. The summary of NMOC/NO<sub>x</sub> ratios for the scenarios described above is shown below.

**NMOC/NO<sub>x</sub> Ratio Summary**

<b>Scenario</b>	<b>NMOC (TPY)</b>	<b>NO<sub>x</sub> (TPY)</b>	<b>NMOC/NO<sub>x</sub> ratio</b>
Base Case	599	131	4.57
Post-upgrade	663	136	4.87

3. Estimated Ozone Impacts

Scheffe’s rural screening table has been reproduced below. This conservatively estimates the potential ozone impacts as a function of NMOC and NO<sub>x</sub> emissions.

**Rural-based ozone increment (ppmv) as a function of NMOC emissions and NMOC/NO<sub>x</sub> ratios.**

NMOC Emissions (TPY)	Tons NMOC/Tons NO <sub>x</sub>		
	>20	5-20	< 5
50	0.004	0.004	0.011
75	0.004	0.004	0.012
100	0.004	0.005	0.014
300	0.008	0.010	0.017
500	0.011	0.014	0.019
750	0.016	0.019	0.023
1,000	0.020	0.024	0.027
1,500	0.027	0.030	0.033
2,000	0.034	0.038	0.037
3,000	0.048	0.052	0.043
5,000	0.070	0.075	0.048
7,500	0.098	0.101	0.051
10,000	0.122	0.129	0.054

Using linear interpolation for the base case and post-modification scenario results in the maximum hourly ambient ozone impacts summarized below. For purposes of determining ozone increment, the NMOC emission rate does not utilize the annual rates. Instead, this NMOC emission rate is the annual emission rate based upon a maximum daily rate.

**Scheffe Analysis Results**

Scenario	Annualized NMOC Emissions (TPY)	NMOC/NO <sub>x</sub> Ratio	Ozone Increment (ppmv)
Base Case	599	4.57	0.0206
Post-upgrade	663	4.87	0.0245

Using the Scheffe method, the potential ambient hourly ozone impact from this proposed modification is only 0.0039 ppmv of ozone (i.e., 0.0245 ppmv less 0.0206 ppmv). This maximum predicted impact is approximately 4.9% of the ozone 8-hour NAAQS (0.08 ppm). Based on the analysis, it is determined that the proposed modification will not threaten the ozone NAAQS. Monitoring at a site 11.4 km NNE of the facility, conducted from May 4, 2005 to September 5, 2005, indicated compliance with the 8-hour ozone standard. Since the impact is less than one tenth of the standard, the standard is not expected to be exceeded.



**D. Additional Impacts Analysis**

An additional impacts analysis is completed based on existing air quality, the quantity of emissions, and the sensitivity of local soils, vegetation, and visibility in the project's area of impact. The additional impact analysis consists of three parts: (1) growth, (2) soils and vegetation impacts, and (3) visibility impairment. Each of these analyses is presented in this section.

The purpose of the growth analysis is to predict quantitatively the amount of new growth likely to occur to support the source or modification under review and to estimate the emissions that will result from the associated growth. First, an assessment is made regarding the amount of residential growth the modified source will bring to the area. This depends on the size of the available work force, the number of new employees, and the availability of housing in the area. Associated commercial and industrial growth consists of new sources providing goods and services to the new employees and to the modified source itself. Once these anticipated growth effects have been considered, an estimate of the air pollutant emissions which would likely result from the associated growth is made.

Analysis of the impact of air emissions on soils and vegetation is based on an inventory of the soils and vegetation types found in the impact area. This inventory includes all vegetation of any commercial or recreational significance. For most types of soil and vegetation, ambient concentrations of criteria pollutants below the secondary NAAQS do not result in harmful effects.

The visibility impairment analysis considers the impacts that occur within the impact area of the modified source. The visibility analysis required considers issues similar to the Class I area visibility analysis requirements.

**1. Growth Analysis**

The elements of a growth impact analysis include a projection of the associated industrial, commercial and residential growth that will occur in the area due to the project, including the potential impact upon ambient air due to this growth. The overall increase in growth in the area is expected to be minimal. The increase in pine lumber production is expected to partially offset the decrease in production at the mill due to the plywood and hardwood shutdowns in 2005. Since there is no significant associated commercial or industrial growth, negligible growth-related air pollution impacts are expected.

**2. Soil and Vegetation Analysis**

The effects of gaseous air pollutants on vegetation may be classified into three rather broad categories: acute, chronic, and long-term. Acute effects are those that result from relatively short (less than 1 month) exposures to high concentrations of pollutants. Chronic effects occur when organisms are exposed for months or even years to certain threshold levels of pollutants. Long-term effects include abnormal changes in ecosystems and subtle physiological alterations in organisms. Acute and chronic effects are caused by the gaseous pollutant acting directly on the organism, whereas long-term effects may be indirectly caused by secondary agents such as

changes in soil pH. Consequently, the secondary NAAQS, which establishes the ambient concentration levels below which no harmful effects to either soil or vegetation can be expected, is used as an indicator of potentially adverse impacts.

For ozone, the secondary NAAQS is the same as the primary NAAQS (0.08 ppmv for an 8-hour average). As demonstrated in the ambient impact analysis, the maximum ambient ozone impact from this project is not significant in comparison to the primary NAAQS. Thus, it can be concluded that the impact on soil and vegetation will be negligible.

### 3. Visibility Analysis

U.S. EPA prescribes the use of its *Workbook for Plume Visual Impact Screening and Analysis* for conducting a visibility impairment analysis. Three levels of screening procedures are outlined by U.S. EPA. If the criteria for the first (most conservative) screening level are met, no further analysis is required.

The VISCREEN model is recommended for the first level (Level 1) screen. If calculated values from the VISCREEN model are greater than the standardized screening values, the emissions are judged to have the potential for visibility impairment. If the potential for visibility impairment is indicated, the next level analysis, Level 2 analysis, is required.

The VISCREEN model primarily considers NO<sub>2</sub> and particulate emissions increases associated with a modification. In this case, the project actually results in a decrease in particulate emissions, with minimal NO<sub>2</sub> emissions associated with this expansion project. VISCREEN does not consider or calculate visibility impacts due to ozone. Thus, a VISCREEN analysis is not conducted in association with this PSD application because emission increases of the only applicable pollutant, NO<sub>2</sub>, are trivial.

### **E. PSD Class I Analysis**

The nearest Class I area is the Caney Creek Wilderness Area located in southwestern Arkansas. It is approximately 87 km from the Wright City Mill. Since a Class I is less than 100 km away from the proposed modifications a Class I Area analysis is required.

As the only pollutant undergoing PSD review is VOC (a precursor to ozone), the potential ozone impacts must be addressed. From the Federal Land Managers' Air Quality Related Values Workgroup (FLAG) Draft Phase I Report (October 1999):

*FLAG agrees with the EPA contention that single source-receptor modeling for ozone is not feasible at this time. FLM actions or specific requests on a permit application will be based on the existing air pollution situation at the area they manage. These conditions include (1) whether or not actual ozone damage has occurred in the area, and (2) whether or not ozone exposure levels occurring in the area are high enough to cause damage to vegetation (i.e., phytotoxic [ozone] exposures).*

*NO<sub>x</sub> and VOC are of concern because they are precursors of ozone. Current information indicates most FLM areas are NO<sub>x</sub> limited. Until we determine the VOC or NO<sub>x</sub> status of each area, we will focus on control of NO<sub>x</sub> emission sources.*

Based on the draft FLAG guidance, no Class I analysis is necessary for this project.

**F. Endangered Species Act**

Even though there are 20 different endangered or threatened species listed in Oklahoma, natural heritage records indicate that only a few are listed as being in McCurtain County.

**Listed Endangered or Threatened Species in McCurtain County**

Listed	Name	County Status
E	American Burying Beetle ( <i>Nicrophorus americanus</i> )	Critically Imperilled
T	Leopard Darter ( <i>Percina pantherina</i> ) <sup>1</sup>	Critically Imperilled
T	Bald Eagle ( <i>Haliaeetus leucocephalus</i> ) <sup>2</sup>	Not Ranked
E	Scaleshell Mussel ( <i>Leptodea leptodon</i> )	Critically Imperilled
E	Ouachita Rock Pocketbook ( <i>Arkansia wheeleri</i> )	Critically Imperilled
E	Least Tern (Interior Population) <sup>3</sup> ( <i>Sterna antillarum</i> )	Imperilled
E	Red-Cockaded Woodpecker ( <i>Picoides borealis</i> )	Critically Imperilled

<sup>1</sup> - Listed for Little River and Glover River Systems

<sup>2</sup> - Proposed for delisting

<sup>3</sup> - Listed for U.S. interior (inland) rivers in Texas (i.e. – Red River)

Since the facility is an existing facility, the probability of impacting a listed species or their habitat is low. With the exception of the American Burying Beetle the listed species and habitats are associated mainly with rivers and lakes. None of these species populations are likely to be significantly impacted by the modification of this facility.

**SECTION VII. OKLAHOMA AIR POLLUTION CONTROL RULES**

OAC 252:100-1 (General Provisions) [Applicable]  
 Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
 Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-4 (New Source Performance Standards) [Subpart KKK is Applicable]  
 Federal regulations in 40 CFR Part 60 are incorporated by reference as they existed on September 1, 2005, except for the following: Subpart A (Sections 60.4, 60.9, 60.10, and 60.16), Subpart B, Subpart C, Subpart Cb, Subpart Cc, Subpart Cd, Subpart Ce, Subpart AAA, Subpart BBBB,

Subpart DDDD, Subpart HHHH, and Appendix G. NSPS requirements are addressed in the “Federal Regulations” section.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]  
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]  
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for single HAP that the EPA may establish by rule

Since this is a physical change with a significant modification a construction permit was required. Since the modification was subject to PSD it is considered a significant modification. Emissions limitations (lb/hr and TPY) have been incorporated from the current Title V operating permit (Permit No. 99-052-TV (M-1)) and the application.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]  
In the event of any release which results in excess emissions, the owner or operator of such facility shall notify the Air Quality Division as soon as the owner or operator of the facility has knowledge of such emissions, but no later than 4:30 p.m. the next working day. Within ten (10) working days after the immediate notice is given, the owner operator shall submit a written report describing the extent of the excess emissions and response actions taken by the facility. Part 70 sources must report any exceedance that poses an imminent and substantial danger to public health, safety, or the environment as soon as is practicable; but under no circumstances shall notification be more than 24 hours after the exceedance.

OAC 252:100-13 (Open Burning) [Applicable]  
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]  
This subchapter specifies a particulate matter (PM) emissions limitation of 0.6 lb/MMBTU from fuel-burning equipment with a rated heat input of 10 MMBTUH or less. For fossil fueled fuel-burning emission unit with a rated heat input between 10 and 270 MMBTUH, PM emissions are limited to between 0.599 and 0.28 lb/MMBTU as defined in Appendix C. For indirectly fired

wood fueled fuel-burning emission units with a rated heat input between 10 and 1,000 MMBTUH, PM emissions are limited to 0.50 lb/MMBTU as defined in appendix D.

AP-42 (7/98), Chapter 1.4, Table 1.4-1 lists natural gas TPM emissions to be 7.6 lb/million SCF or about 0.0076 lb/MMBTU, which is in compliance with this subchapter. Therefore, small natural gas-fired heaters are in compliance with this subchapter without specific limitations. AP-42 (9/98) Chapter 1.3, Tables 1.3-1 and 1.3-2 list fuel oil No. 2 TPM emissions to be 3.3 lb/1,000 gallons or about 0.02 lb/MMBTU, which is in compliance with this subchapter. Therefore, small diesel-fired engines will comply with this subchapter without specific limitations.

The wood-burning boiler is rated at 240 MMBTUH and has an applicable PM emission limitation of 0.50 lb/MMBTU. The anticipated PM emission rate from the wood-fired boiler is 0.27 lb/MMBTU, which is in compliance with this subchapter. The permit will require the use of ESPs, and a total field voltage of 50 kV or more to ensure compliance with this limitation.

This subchapter also limits emissions of particulate matter from direct-fired fuel-burning equipment and industrial processes based on their process weight rates. The emission rate in pounds per hour (E) is not to exceed the rate calculated using the process weight rate in tons per hour (P). For process rates up to 30 TPH, the formula in appendix G is  $(E = 4.10 * P^{(0.67)})$ . For process rates greater than 30 TPH, the formula in Appendix G is  $E = 55.0 * P^{(0.11)} - 40$ . The following table shows the process weight rates, allowable PM emission rates, and permit limitations. All anticipated PM emissions rates are in compliance with Subchapter 19.

Process Unit	Process Weight Rate, Ton/hr	Allowable PM Emissions, lb/hr	PM Emissions, lb/hr
Debarkers	85.2 to 224.4	49.68	0.32
Lg. Trim Chipper Cyclone	7.6	15.96	0.03
223 Dry Chips	1.49	5.36	0.90
230 Planer shavings	6.25	14.0	3.80
231 Planer shavings	2.68	7.94	1.63
233 Planer shavings	4.46	11.16	2.71
233A Planer shavings	4.46	11.16	3.50
Chipper 1	5.50	12.85	0.18
Material Transfer Systems	1.49-197	5.36	0.40
HW Merchandiser Sawing	234.20	60.23	0.01
Pine Merchandiser Sawing	302.00	63.07	0.01
Pine Lumber Kiln 1	21.32	31.84	2.76
Pine Lumber Kiln 2	12.18	21.89	1.57
Pine Lumber Kiln 3	20.20	30.72	2.61
Pine Lumber Kiln 4	17.89	28.32	2.31

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]  
 No discharge of greater than 20% opacity is allowed except for short-term discharges, which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute

period exceed 60% opacity. With the ESP in operation on the wood-fired boiler, the opacity limitation will not be exceeded. The permit will also require monitoring ESP operation, specifically voltage, to demonstrate compliance with the opacity limitation for the boiler. Based on experience with the other operations at the facility, the potential for violating the standards is negligible without additional specific limitations.

OAC 252:100-29 (Fugitive Dust)

[Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Most of the materials handled are wood/wood waste, therefore non-brittle and not very susceptible to becoming fugitive dust. Haul roads and boiler ash are watered to minimize emissions of fugitive dust. The facility will be required to use reasonable procedures to limit fugitive dust.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed or modified after July 1, 1972). For solid fuels the limit is 1.2 lb/MMBTU heat input. For liquid fuels the limit is 0.8 lb/MMBTU. For gaseous fuels the limit is 0.2lb/MMBTU. The averaging times for the emission limits is three hours unless a solid fuel sampling method is used to determine compliance. For solid fuel sampling the averaging time is 24-hours. When fuels are burned simultaneously in any combination, the applicable standard shall be determined by proration unless a secondary fuel is used in de minimis quantities of less than 5% of the total heat input annually.

AP-42 (09/2003), Section 1.6, lists the upper end of the range of SO<sub>2</sub> emissions for wood combustion as 0.025 lb/MMBTU, which is in compliance with this subchapter. AP-42 (07/1998), Section 1.4, lists SO<sub>2</sub> emissions for commercial gas combustion at 0.6 lb/MMSCF or 0.006 lb/MMBTU, which is in compliance with this subchapter. AP-42 (10/1996), Section 3.3, lists SO<sub>2</sub> emissions for diesel fired internal combustion engines at 0.29 lb/MMBTU, which is in compliance with this subchapter. Thus, using commercial-grade natural gas in the heaters, wood fuel in the boiler, and diesel in the small internal combustion engines will ensure compliance with this subchapter.

OAC 252:100-33 (Nitrogen Oxides)

[Applicable]

This subchapter limits NO<sub>x</sub> emissions from new or modified fuel-burning equipment with a rated heat input of 50 MMBTUH or greater that burns solid fossil, gas, or liquid fuel. Solid fossil fuel-fired fuel-burning equipment is limited to 0.70 lb/MMBTU and liquid fuel-fired fuel-burning equipment is limited to 0.30 lb/MMBTU. The boiler was constructed prior to 1972 but was modified in 1978. Wood fuel is not considered a solid fossil fuel. AP-42 (09/1998), Section 1.3, lists NO<sub>x</sub> emissions from combustion of distillate fuel oil and Fuel Oil No. 4 as 0.14 lb/MMBTU, which is in compliance with the limitation of this subchapter for liquid fuel-burning equipment. Therefore, when burning diesel fuel in the boiler the boiler will be in compliance with this subchapter.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

None of the following affected processes are located at this facility: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds)

[Parts 3 & 7 are Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and containing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The gasoline tanks have submerged fill pipes. The storage tanks containing diesel have vapor pressures below the 1.5 psia *de minimis* level.

Part 3 requires loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. The facility does not have the physical equipment (loading arm and pump) to conduct this type of loading. Therefore, this requirement is not applicable.

Part 5 limits the VOC content of coatings used in any coating line or operation. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment, which is exempt.

Part 7 also requires fuel-burning and refuse-burning equipment to be operated and maintained so as to minimize emissions. Temperature and available air must be sufficient to provide essentially complete combustion. The equipment at this location is subject to this requirement.

Part 7 requires all effluent water separator openings or floating roofs to be sealed or equipped with an organic vapor recovery system. No effluent water separators are located at this facility.

OAC 252:100-41 (Hazardous Air Pollutants)

[Not Applicable]

Part 3 addresses hazardous air contaminants. NESHAP, as found in 40 CFR Part 61, are adopted by reference as they exist on September 1, 2005, with the exception of Subparts B, H, I, K, Q, R, T, W and Appendices D and E, all of which address radionuclides. In addition, General Provisions as found in 40 CFR Part 63, Subpart A, and the Maximum Achievable Control Technology (MACT) standards as found in 40 CFR Part 63, Subparts F, G, H, I, L, M, N, O, Q, R, S, T, U, W, X, Y, AA, BB, CC, DD, EE, GG, HH, II, JJ, KK, LL, MM, OO, PP, QQ, RR, SS, TT, UU, VV, WW, XX, YY, CCC, DDD, EEE, GGG, HHH, III, JJJ, LLL, MMM, NNN, OOO, PPP, QQQ, RRR, TTT, UUU, VVV, XXX, AAAA, CCCC, DDDD, EEEE, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK, MMMM, NNNN, OOOO, PPPP, QQQQ, RRRR, SSSS, TTTT, UUUU, VVVV, WWWW, XXXX, YYYY, ZZZZ, AAAAA, BBBB, CCCC, EEEEE, FFFFF, GGGGG, HHHHH, IIII, JJJJ, KKKKK, LLLLL, MMMMM, NNNNN, PPPPP, QQQQQ, RRRRR, SSSSS and TTTTT are hereby adopted by reference as they exist on September 1, 2005. These standards apply to both existing and new sources of HAPs. These requirements are covered in the "Federal Regulations" section.

Part 5 was a **state-only** requirement governing sources of toxic air contaminants that have emissions exceeding a *de minimis* level. However, Part 5 of Subchapter 41 has been superseded by OAC 252:100-42, effective June 15, 2006.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

Part 5 of OAC 252:100-41 was superceded by this subchapter. Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained unless a modification is approved by the Director. Since no Area of Concern (AOC) has been designated anywhere in the state, there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests.

Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

**The following Oklahoma Air Pollution Control Rules are not applicable to this facility:**

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Landfills	not in source category

**SECTION VIII. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52 [Applicable]

The planned modifications have caused a significant increase in VOC and PM<sub>10</sub> emissions but only a significant net emission increase in VOC emissions as specified in the PSD Review Section. The facility has demonstrated that the modification will not cause or contribute to a violation of a NAAQS or adversely affect visibility or other air quality related value (AQRV). Any future increases of emissions must be evaluated for PSD if they exceed a significance level (100 TPY CO, 40 TPY NO<sub>x</sub>, 40 TPY SO<sub>2</sub>, 40 TPY VOC, 25 TPY PM, 15 TPY PM<sub>10</sub>, 0.6 TPY lead).



NSPS, 40 CFR Part 60 [Not Applicable]

Subpart D, Fossil Fuel Fired Steam Generators. This subpart affects fossil-fuel fired steam generating units and fossil-fuel and wood-residue fired steam generating units capable of firing fossil fuel at a heat input rate of more than 73 megawatts (250 million Btu per hour) MMBTUH that commenced construction, reconstruction, or modification after August 17, 1971. The boiler located at this facility does not meet the definition of fossil-fuel fired steam generating unit and fossil-fuel and wood-residue fired steam generating units since it does not fire fossil fuels at a heat input rate of 250 MMBTUH. The wood residue fired steam generating unit is rated at 240 MMBTUH.

Subpart Db, Industrial-Commercial-Institutional Steam Generating Units. This subpart affects boilers with a rated heat input above 100 MMBTUH which commenced construction, reconstruction, or modification after June 19, 1984. Modifications of the boiler commenced in 1976, prior to the effective date of Subpart Db.

Subpart Kb, Volatile Organic Liquids Storage Vessels. This subpart affects volatile organic liquid storage tanks with a capacity greater than 19,813-gallons that commenced construction, reconstruction, or modification after July 23, 1984. The storage vessels were all constructed prior to when NSPS was promulgated and are smaller than the 19,813-gallon de minimis level.

NESHAP, 40 CFR Part 61 [Not Applicable]

There are no emissions of any of the pollutants subject to 40 CFR Part 61 except for trace amounts of benzene and arsenic. Subpart J affects process streams that are more than 10% by weight benzene. None of these subparts affect wood-waste combustion.

NESHAP, 40 CFR Part 63 [Subparts DDDD and DDDDD are Applicable]

Subpart DDDD, Plywood and Composite Wood Products (PCWP). This subpart was promulgated on July 30, 2004, and affects PCWP manufacturing facilities that are major sources of HAP or that are collocated at a major source of HAP. The PCWP is applicable due to operation of the lumber kilns which have no controls. There are no substantive requirements for lumber kilns.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE with a site rating greater than 500 brake horsepower and which are located at a major source of HAP emissions. The subpart establishes emission and operating limitations for each affected source. None of the engines exceed the 500-horsepower de minimis level and are not subject to this subpart.

Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters. This subpart was promulgated on September 13, 2004, and affects any boiler or process heater located at a major source of HAP. The boiler at this facility is classified as an existing large solid fuel boiler (ELSFb). ELSFB's are required to meet the emission limitations in Table 1, Section 9 and the work practice standards of Table 2, Section 3 or Table 3, Section 3 or Section 6, and Table 4, Section 3 of Subpart DDDDD. ELSFB's complying with the PM standard and other standards through stack testing are required to conduct initial performance tests in accordance with Table 5, Sections 1-4. ELSFB's complying with the alternative TSM standard and other standards through fuel sampling are required to only conduct initial fuel sampling in accordance with Table 6, Sections 1-3. ELSFB's using the fuel analysis to show compliance must keep monthly fuel

usage records and conduct fuel analyses for previously analyzed fuels no later than five years after the previous fuel analysis and each new fuel prior to burning the fuel in the boiler. Initial compliance for existing affected facilities must be demonstrated no later than 180 days after September 13, 2007. The permit will require compliance with all applicable requirements by September 13, 2007.

Compliance Assurance Monitoring, 40 CFR Part 64 [Applicable]  
Compliance Assurance Monitoring, as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source that is required to obtain a Title V permit, if it meets all the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant.
- It uses a control device to achieve compliance with the applicable emission limit or standard.
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than major source emission levels.

EUG 19 has emission limits, uses a control device to achieve compliance with these emission limits, and has the potential to emit (pre-control device) 100 TPY of PM<sub>10</sub> and VOC. The applicant has submitted a CAM plan with their Part 70 operating permit renewal application.

Specific Condition No. 1 requires continuous monitoring of control device operating parameters (voltage) to assure compliance with the applicable emission limits and Standard Condition No. II.B requires reporting of excess emissions if emissions exceed the limits of Specific Condition No. 1. The permit requires continuous monitoring and recording of the ESP voltage, during operation of the boiler. The permit also requires annual calibration of the meter.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]  
Toxic and flammable substances subject to this regulation not stored on-site in quantities greater than the threshold quantities. More information on this federal program is available on the web page: [www.epa.gov/ceppo](http://www.epa.gov/ceppo).

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are Applicable]  
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The standard conditions of the permit address the requirements specified at § 82.156 for persons opening appliances for maintenance, service, repair, or disposal; § 82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; § 82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; § 82.166 for recordkeeping; § 82.158 for leak repair requirements; and § 82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

## SECTION IX. COMPLIANCE

### Tier Classification and Public Review

This application has been determined to be a Tier II based on the request for a construction permit for a Part 70 permit. The applicant published the "Notice of Filing a Tier II Application" in the *McCurtain Gazette* on April 20, 2006, a daily newspaper of general circulation in McCurtain County. The notice said that the application was available for public review at the Idabel Public Library or at the AQD office. A draft of this permit was made available for public review for a period of thirty days. The applicant published the "Notice of Draft Permit" in the *McCurtain Gazette* on June 13, 2006, a daily newspaper of general circulation in McCurtain County. The notice said that the draft permit and application were available for public review at the Idabel Public Library or at the AQD office. The draft permit was also made available for public review on the Air Quality section of the DEQ web page at <http://www.deq.state.ok.us>. No comments were received from the public. The facility is within 50 miles of the Oklahoma borders with the states of Arkansas and Texas. These states were notified of the draft permit. No comments were received from either state. This permit was approved for concurrent public and EPA review. Since no comments were received during the public comment period, the draft permit is deemed the proposed permit. The draft permit was forwarded to EPA Region VI for a 45-day review period. No comments were received from the EPA.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the property.

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page:<http://www.deq.state.ok.us/>

**Fees Paid**

Construction permit application fee for a modification at an existing Part 70 source of \$1,500.

**SECTION X. SUMMARY**

This facility has demonstrated the ability to comply with all applicable air quality rules and regulations. There are no active Air Quality compliance or enforcement issues that would affect the issuance of this permit. Issuance of the construction permit is recommended.

Weyerhaeuser Company  
Attn: Mr. Jim Bacorn  
Environmental Manager  
HC 74, Box 100  
Wright City, OK 74728

Re: Permit Application No. 99-052-C (M-2) (PSD)  
Wright City Pine Lumber Mill  
Section 3 – T6S – R22E, Wright City, McCurtain County, Oklahoma

Dear Mr. Bacorn:

Enclosed is the amended permit authorizing construction of the referenced facility. Please note that this permit is issued subject to the standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed on approved AQD forms and submitted (hardcopy or electronically) by March 1st of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at 405-702-4100.

Thank you for your cooperation. If you have any questions, please contact me at [eric.milligan@deq.state.ok.us](mailto:eric.milligan@deq.state.ok.us) or at (405) 702-4217.

Sincerely,

Eric L. Milligan, P.E.  
Engineering Section  
**AIR QUALITY DIVISION**

Enclosures

Copy: McCurtain County DEQ Office



# PART 70 PERMIT

AIR QUALITY DIVISION  
STATE OF OKLAHOMA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
707 NORTH ROBINSON, SUITE 4100  
P.O. BOX 1677  
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 99-052-C (M-2) (PSD)

Weyerhaeuser Company,

having complied with the requirements of the law, is hereby granted permission to  
construct/modify accordance with this permit the Wright City Mill located in S3, T6S,  
R22E, McCurtain County, Oklahoma,

subject to the following conditions, attached:

Standard Conditions dated July 1, 2005

Specific Conditions

In the absence of construction commencement, this permit shall expire 18 months from the issuance date, except as authorized under Section VIII of the Standard Conditions.

\_\_\_\_\_  
Division Director, Air Quality Division

\_\_\_\_\_  
Date

**PERMIT TO CONSTRUCT  
AIR POLLUTION CONTROL FACILITY  
SPECIFIC CONDITIONS**

**Weyerhaeuser Company  
Wright City Mill**

**Permit No. 99-052-C (M-2) (PSD)**

The permittee is authorized to construct in conformity with the specifications submitted to Air Quality on April 6, 2006, May 4, 2006, and all supplemental information. The Evaluation Memorandum dated July 17, 2006, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain limitations or permit requirements. Commencing construction/operation under this permit constitutes acceptance of, and consent to the conditions contained herein:

1. Points of emissions and emissions limitations for each point. Compliance with VOC emissions limitations shall be determined on a 24-hour basis. [OAC 252:100-8-6(a)(1)]

**EUG 2 – Debarkers:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

<b>EU</b>	<b>Point</b>	<b>EU Name/Model</b>	<b>Const. Date</b>
H-HM-Dbrkr	H-HM-Dbrkr	Hardwood Merch Drum Debarker	1972
P-LO-Dbrkr	P-LO-Dbrkr	Pine Sawmill Knife Debarker	1996

**EUG 3 – Cyclones:** These emissions units (separation systems for pneumatic material handling systems) are “grandfathered” and limited to the existing equipment as it is.

<b>EU</b>	<b>Point</b>	<b>EU Name/Model</b>	<b>Const. Date</b>
H-HS-CYCLN	S-H-HS-CYCLN	Planer Large Trim Chipper w/Cyclone	1971/1997
P-LO-D223	S-P-P-LO-D223	223 Dry Chips From Planer Mill w/Cyclone	1971
P-LO-D230	S-P-LO-D230	230 Planer Shavings and Sawdust w/Cyclone	1971
P-LO-D231	S-P-LO-D231	231 Planer Shavings and Sawdust w/Cyclone	1971
P-LO-D233	S-P-LO-D233	233 Planer Shavings and Sawdust w/Cyclone	1971/1982
P-LO-D233A	S-P-LO-D233A	233A Planer Shavings and Sawdust w/Cyclone	1971/1982

A. The above operations shall be operated with air exhausts processed by cyclones.  
[OAC 252:100-8-6(a)(1) & OAC 252:100-19-12]

**EUG 3A – Chipper:** Emissions from the equipment listed below are fugitive and have no emission limits.

<b>EU</b>	<b>Point</b>	<b>EU Name/Model</b>	<b>Const. Date</b>
Chipper 1	Fugitive	BK/Bruks Drum Chipper	2003

- A. The chipper shall be authorized to operate at a process rate of up to 36,960 dry tons/year (12-month rolling total). [OAC 252:100-8-6(a)(1)]
- B. Compliance with the annual throughput limit shall be determined monthly based on a 12-month rolling total. [OAC 252:100-8-6(a)]

**EUG 3B – Pine Lumber Sawing:**

EU	Point	EU Name/Model	Const. Date
P-LO-G204	Cyclone 204	204 Lumber Mill Green Chips w/Cyclone	1971

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/hr	TPY	lb/hr	TPY
204 Lumber Mill Green Chips w/Cyclone	Cyclone 204	0.91	4.00	9.33	20.28

<sup>1</sup> – VOC as VOC

- A. The sawing operation material handling system shall be operated with air exhausts processed by cyclones. [OAC 252:100-8-6(a)(1) & OAC 252:100-19-12]
- B. Compliance with emission limits shall be demonstrated by compliance with a process rate limitation of up to 300 million board feet per year (12-month rolling total). [OAC 252:100-8-6(a)(1)]

**EUG 4 – Material Transfer Systems:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU	Point	EU Name/Model	Const. Date
H-HM-Mtran	H-HM-Mtran	Hardwood Merchandiser Material Transfer	1972
P-MA-Mtran	P-MA-Mtran	Pine Merchandiser – Material Transfer	1971
P-LO-GMtrn	P-LO-GMtrn	Lumber Green End Material Transfer	1998
P-LO-DMtrn	P-LO-DMtrn	Lumber Dry End Material Transfer	1968
Prh-Mtrn	Prh-Mtrn	Powerhouse Material Transfer	1978

**EUG 5 – Material Storage Piles:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU	Point	EU Name/Model	Const. Date
H-HM-BrkSP	Fugitive	Hardwood Area Bark Storage Pile	1972
P-MA-BrkSP	Fugitive	Pine Area Chip Storage Piles	1971
P-MA-BrkSP	Fugitive	Pine Area – Bark Storage Piles	1971
Prh-FuelSP	Fugitive	Powerhouse Area Hog Fuel Storage Pile	1978
Prh-AshSP	Fugitive	Ash Pile	1979

- A. The permittee shall water material piles when necessary to control emissions of fugitive dust. [OAC 252:100-29]



**EUG 6 – Hardwood Merchandizer Sawing:** These emissions units are “grandfathered” and limited to the existing equipment as it is.

EU	Point	EU Name/Model	Const. Date
H-HM-SAW	Fugitive	Hardwood Merchandiser	Pre-1972

**EUG 7 – Pine Merchandiser Sawing:** These emissions units are considered insignificant.

EU	Point	EU Name/Model	Const. Date
P-MA-SAW	Fugitive	Pine Merchandiser Sawing	2003

**EUG 8 – Pine Lumber Kilns:**

<b>222.09</b>	<b>40.53</b>	<b>3,947.9</b>	<b>720.49</b>
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EU	Point	EU Name/Model	Const. Date
P-LO-Gkil1	S-P-LO-Gkil1	Pine Lumber Kiln No. 1	1973
P-LO-Gkil2	S-P-LO-Gkil2	Pine Lumber Kiln No. 2	1974
P-LO-Gkil3	S-P-LO-Gkil3	Pine Lumber Kiln No. 3	1998
P-LO-Gkil4	P-LO-Gkil4	Pine Lumber Kiln No. 4	1980

EU Name/Model	Point	PM <sub>10</sub>		VOC <sup>1</sup>	
		lb/day	TPY	lb/day	TPY
Pine Lumber Kiln No. 1	S-P-LO-Gkil1	222.09	40.53	3947.9	720.49
Pine Lumber Kiln No. 2	S-P-LO-Gkil2				
Pine Lumber Kiln No. 3	S-P-LO-Gkil3				
Pine Lumber Kiln No. 4	S-P-LO-Gkil4				

<sup>1</sup> – VOC as VOC

- A. Compliance with emission limitations shall be demonstrated by complying with a process rate limitation of up to 300 million board feet per year of pine lumber (12-month rolling total). [OAC 252:100-8-6(a)(1)]

**EUG 16 – Material Storage Bins:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU	Point	EU Name/Model	Const. Date
P-LO-DPST1	P-LO-DPST1	Pine Lumber Dry End Planer Shavings Truck Bin #1	1982
P-LO-DPST2	P-LO-DPST2	Pine Lumber Dry End Planer Shavings Truck Bin #2	1992

**EUG 19 – Boiler:**

EU	Point	EU Name/Model	Const. Date
Prh-Boiler	Prh – Boiler	240 MMBTUH Wood and Fuel Oil Fired	1978

EU Name/Model	Point	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		VOC <sup>1</sup>		CO	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Wood-Fired Boiler	Prh-Boiler	9.27	30.48	7.03	23.13	57.83	190.27	0.96	3.15	46.01	151.37

<sup>1</sup> - VOC as VOC

- A. The wood-fired boiler shall be fueled with wood or wood residuals combustion of which shall result in SO<sub>2</sub> emissions of 0.025 lb/MMBTU or less. [OAC 252:100-31]
- B. Exhausts from the wood-fired boiler shall be processed by an electrostatic precipitator (ESP) for control of particulate matter emissions. The voltage on the ESP shall be maintained at least at a total of 50 kV or more when the boiler is operating.  
[OAC 252:100-8-6(a)(1)]
- C. Compliance with the TPY emission limitations shall be demonstrated by complying with a process limitation of up to 1,051.2 million pounds of steam per year (12-month rolling total). [OAC 252:100-8-6(a)(1)]

**EUG 20 – Unpaved Roads:** The fugitive emissions are “grandfathered” (constructed prior to any applicable rule). There are no emission limits applied to these units under Title V but they are limited to the existing equipment as it is.

EU	Point	EU Name/Model	Const. Date
PW-Road	Fugitive	Unpaved Roads	pre-1972

- A. The permittee shall water haul roads when necessary to control emissions of fugitive dust. [OAC 252:100-29]

**EUG 21 – Tanks:** Emissions from the equipment listed below are estimated based on existing equipment items but do not have a specific limitation and the emissions are insignificant.

EU	Point	Contents	Capacity (Gallons)	Const. Date
Tank 4	Tank 4	Unleaded Gasoline	2,046	unknown
Tank 5	Tank 5	Unleaded Gasoline	2,961	unknown
Tank 6	Tank 6	Diesel	2,046	1971
Tank 10	Tank 10	Diesel	18,799	1971
Tank 11	Tank 11	Diesel	15,098	1971
Tank 12	Tank 12	Unleaded Gasoline	15,098	1972
Tank 21	Tank 21	Diesel	1,000	2005

**EUG 22 – Stationary Engines:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

<b>EU</b>	<b>EU Make/Model</b>	<b>HP</b>	<b>Serial #</b>	<b>Const. Date</b>
North Engine	Cummins N-855-F	280	11189308	1999
South Engine	Cummins NT-280-IF	280	10225236	1972
Scale Generator	United Engines Model 5023-7101	50	2D-31299	Unknown
Bark Washer Diesel Engine	Ford Model 2722E	40	00298/624 LB	Unknown

- A. Each stationary engine shall not be operated more than 500 hours per year, except for the Bark Washer Diesel Engine which is limited to 4,300-hours per year.
  
- 2. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year) up to the limits specified in Specific Condition No. 1.  

[OAC 252:100-8-6(a)]
  
- 3. The permittee shall keep records as follows. Required records shall be retained on location for a period of at least five years following dates of recording and shall be made available to regulatory personnel upon request. The owner/operator shall be able to keep records on alternative media such as: microfilm, computer files, compact disks, magnetic tape disks, or microfiche, provided it does not conflict with other applicable recordkeeping requirements.  

[OAC 252:100-8-6 (a)(3)(B)]

  - A. Chipper 1 production in dry tons per year (monthly and 12-month rolling totals);
  - B. Pine Lumber Sawing throughput in board feet per year (monthly and 12-month rolling totals);
  - C. Inspection and maintenance records of Cyclone 204;
  - D. Total throughput of the Pine Lumber Kilns in board feet per year (monthly and 12-month rolling totals);
  - E. Steam production of the Wood-Fired Boiler in pound per year (monthly and 12-month rolling totals);
  - F. Sulfur content of fuels used in the boiler annually and whenever the type of fuel or fuel mixture changes
  - G. Combined voltage on fields of ESP on boiler (continuous when boiler is operated);
  - H. Periods when the ESP is not operational or the ESP is by-passed when the wood-fired boiler is operational (date and duration);

4. The following records shall be maintained on-site to verify Insignificant Activities. The owner/operator shall be able to keep records on alternative media such as: microfilm, computer files, compact disks, magnetic tape disks, or microfiche, provided it does not conflict with other applicable recordkeeping requirements. No recordkeeping is required for those operations that qualify as Trivial Activities. [OAC 252:100-8-6 (a)(3)(B)]

- A. Each emergency generator: hours of operation (cumulative annual).
- B. Fuel dispensing to vehicles: throughput (cumulative annual, for gasoline and for diesel).
- C. Tanks 19 and 20: Vapor pressures and capacities of all storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
- D. Debarkers, material transfer cyclones, material storage piles, and material storage bins: calculations of PM<sub>10</sub> emissions (annual).

5. No later than 30 days after each anniversary date of the issuance of the original Title V operating (February 26, 2001), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. The following specific information is required to be included:

[OAC 252:100-8-6 (c)(5)(A) & (D)]

- A. Summary of the each months 12-month rolling totals for the Chipper, Pine Lumber Sawing, Pine Lumber Kilns, and Wood-Fired Boiler showing compliance with the processing limitations in Specific Condition No. 1;
- B. Summary of inspection and maintenance records for Cyclone 204;
- C. Sulfur content of fuels combusted in the Wood-Fired Boiler (quarterly testing);
- D. Results of any stack testing conducted during the previous year; and

6. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility.

[OAC 252:100-8-6(d)(2)]

- A. OAC 252:100-11            Alternative Emissions Reduction
- B. OAC 252:100-15        Mobile Sources
- C. OAC 252:100-23        Cotton Gins
- D. OAC 252:100-24        Grain Elevators
- E. OAC 252:100-39        Nonattainment Areas
- F. OAC 252:100-47        Landfills
- G. 40 CFR Part 61         NESHAP
- H. 40 CFR Parts 72,        Acid Rain  
73, 74, 75 & 76

**TITLE V (PART 70) PERMIT TO OPERATE / CONSTRUCT  
STANDARD CONDITIONS  
(July 1, 2005)**

**SECTION I. DUTY TO COMPLY**

A. This is a permit to operate / construct this specific facility in accordance with Title V of the federal Clean Air Act (42 U.S.C. 7401, et seq.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, for revocation of the approval to operate under the terms of this permit, or for denial of an application to renew this permit. All terms and conditions (excluding state-only requirements) are enforceable by the DEQ, by EPA, and by citizens under section 304 of the Clean Air Act. This permit is valid for operations only at the specific location listed.

[40 CFR §70.6(b), OAC 252:100-8-1.3 and 8-6 (a)(7)(A) and (b)(1)]

D. 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 the permit. [OAC 252:100-8-6 (a)(7)(B)]

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

A. Any exceedance resulting from emergency conditions and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV. [OAC 252:100-8-6 (a)(3)(C)(iii)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6 (a)(3)(C)(iv)]

C. Oral notifications (fax is also acceptable) shall be made to the AQD central office as soon as the owner or operator of the facility has knowledge of such emissions but no later than 4:30 p.m. the next working day the permittee becomes aware of the exceedance. Within ten (10) working days after the immediate notice is given, the owner operator shall submit a written report describing the extent of the excess emissions and response actions taken by the facility. Every written report submitted under OAC 252:100-8-6 (a)(3)(C)(iii) shall be certified by a responsible official. [OAC 252:100-8-6 (a)(3)(C)(iii)]

**SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

A. The permittee shall keep records as specified in this permit. Unless a different retention period or retention conditions are set forth by a specific term in this permit, these records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), 8-6 (c)(1), and 8-6 (c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions as existing at the time of sampling or measurement.

[OAC 252:100-8-6 (a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report.

[OAC 252:100-8-6 (a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II of these standard conditions.

[OAC 252:100-8-6 (a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

F. Submission of quarterly or semi-annual reports required by any applicable requirement that are duplicative of the reporting required in the previous paragraph will satisfy the reporting requirements of the previous paragraph if noted on the submitted report.

G. Every report submitted under OAC 252:100-8-6 and OAC 252:100-43 shall be certified by a responsible official.

[OAC 252:100-8-6 (a)(3)(C)(iv)]

H. Any owner or operator subject to the provisions of NSPS shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility or any malfunction of the air pollution control equipment.

[40 CFR 60.7 (b)]

I. Any owner or operator subject to the provisions of NSPS shall maintain a file of all measurements and other information required by the subpart recorded in a permanent file suitable for inspection. This file shall be retained for at least two years following the date of such measurements, maintenance, and records. [40 CFR 60.7 (d)]

J. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted. [OAC 252:100-8-6 (c)(4)]

K. All testing must be conducted by methods approved by the Division Director under the direction of qualified personnel. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [40 CFR §70.6(a), 40 CFR §51.212(c)(2), 40 CFR § 70.7(d), 40 CFR §70.7(e)(2), OAC 252:100-8-6 (a)(3)(A)(iv), and OAC 252:100-43]

L. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 CFR Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-4-5 and OAC 252:100-41-15]

#### SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6 (c)(5)(A), (C)(v), and (D)]

B. The certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period; and a statement that the facility will continue to comply with all applicable requirements.

[OAC 252:100-8-6 (c)(5)(C)(i)-(iv)]

C. Any document required to be submitted in accordance with this permit shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete.

[OAC 252:100-8-5 (f) and OAC 252:100-8-6 (c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5 (e)(8)(B) and OAC 252:100-8-6 (c)(3)]

#### **SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6 (c)(6)]

#### **SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6 (d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6 (d)(2)]

#### **SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, -5-2.2, and OAC 252:100-8-6 (a)(8)]

#### **SECTION VIII. TERM OF PERMIT**

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance.

[OAC 252:100-8-6 (a)(2)(A)]



B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1 (d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

### **SECTION IX. SEVERABILITY**

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6 (a)(6)]

### **SECTION X. PROPERTY RIGHTS**

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6 (a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6 (c)(6)]

### **SECTION XI. DUTY TO PROVIDE INFORMATION**

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit. [OAC 252:100-8-6 (a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment. [OAC 252:100-8-6 (a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within 10 days after such date. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112 (G)]

**SECTION XII. REOPENING, MODIFICATION & REVOCATION**

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation, reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6 (a)(7)(C) and OAC 252:100-8-7.2 (b)]

B. The DEQ will reopen and revise or revoke this permit as necessary to remedy deficiencies in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.

C. If “grandfathered” status is claimed and granted for any equipment covered by this permit, it shall only apply under the following circumstances: [OAC 252:100-5-1.1]

- (1) It only applies to that specific item by serial number or some other permanent identification.
- (2) Grandfathered status is lost if the item is significantly modified or if it is relocated outside the boundaries of the facility.

D. To make changes other than (1) those described in Section XVIII (Operational Flexibility), (2) administrative permit amendments, and (3) those not defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII), the permittee shall notify AQD. Such changes may require a permit modification. [OAC 252:100-8-7.2 (b)]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6 (c)(6)]

**SECTION XIII. INSPECTION & ENTRY**

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(18) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6 (c)(2)]

#### SECTION XIV. EMERGENCIES

A. Any emergency and/or exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance.

[OAC 252:100-8-6 (a)(3)(C)(iii)(II)]

B. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency.

[OAC 252:100-8-2]

C. An emergency shall constitute an affirmative defense to an action brought for noncompliance with such technology-based emission limitation if the conditions of paragraph D below are met.

[OAC 252:100-8-6 (e)(1)]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that:

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) the permittee submitted timely notice of the emergency to AQD, pursuant to the applicable regulations (i.e., for emergencies that pose an "imminent and substantial danger," within 24 hours of the time when emission limitations were exceeded due to the emergency; 4:30 p.m. the next business day for all other emergency exceedances). *See OAC 252:100-8-6(a)(3)(C)(iii)(I) and (II)*. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken; and

- (5) the permittee submitted a follow up written report within 10 working days of first becoming aware of the exceedance.

[OAC 252:100-8-6 (e)(2), (a)(3)(C)(iii)(I) and (IV)]

- E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

[OAC 252:100-8-6 (e)(3)]

#### **SECTION XV. RISK MANAGEMENT PLAN**

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date.

[OAC 252:100-8-6 (a)(4)]

#### **SECTION XVI. INSIGNIFICANT ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

[OAC 252:100-8-2]

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

#### **SECTION XVII. TRIVIAL ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2]

#### **SECTION XVIII. OPERATIONAL FLEXIBILITY**

- A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating.

[OAC 252:100-8-6 (a)(10) and (f)(1)]

- B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of 7 days, or 24 hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this subsection. [OAC 252:100-8-6 (f)(2)]

### **SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS**

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) No person shall cause or permit the discharge of emissions such that National Ambient Air Quality Standards (NAAQS) are exceeded on land outside the permitted facility. [OAC 252:100-3]
- (2) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (3) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (4) For all emissions units not subject to an opacity limit promulgated under 40 CFR, Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. [OAC 252:100-25]
- (5) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]
- (6) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (7) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (8) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOC. [OAC 252:100-37-36]

**SECTION XX. STRATOSPHERIC OZONE PROTECTION**

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances. [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4.
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13.
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B. [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166.
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158.
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

**SECTION XXI. TITLE V APPROVAL LANGUAGE**

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Sources' Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in Oklahoma Administrative Code 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 Code of Federal Regulations (CFR) § 70.7 (h)(1). This public notice shall include notice to the public that this permit is subject to Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 CFR § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 CFR § 70.8(a) and (c).
- (5) The DEQ complies with 40 CFR § 70.8 (c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 CFR § 70.8 (d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8 (a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3 (a), (b), and (c), and by EPA as provided in 40 CFR § 70.7 (f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

**SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]