

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY  
OREGON TITLE V OPERATING PERMIT  
REVIEW REPORT for ROSEBURG FOREST PRODUCTS, COQUILLE**

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Unassigned emissions	X
Emission credits	
Source test	X
COMS	X
CEMS	
CAM	X
Ambient monitoring	
Compliance schedule	

Special conditions	
Annual report	X
Semi-annual report	X
Quarterly report	
Monthly report	
Excess emissions report	X
NSPS	

NESHAP	X
NSR	
PSD	
RACT	
Size	TV
Major HAP source	X
Federal major source	

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## INTRODUCTION

1. This Review Report is for the renewal of the existing Oregon Title V Operating Permit for the Roseburg Forest Products Coquille Plywood Facility that was originally issued on August 28, 1996. A minor permit modification was approved on 10/20/97, and another minor permit modification approved on 6/6/00. The company filed a timely application for renewal of the permit on 6/29/99. The renewal permit has been undergoing drafting since that time and has been awaiting finalization of the company's Dillard permit to ensure consistency for all of the company's permits.
2. In accordance with OAR 340-218-0140, this review report is intended to provide the legal and factual basis for the proposed permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

## FACILITY DESCRIPTION

3. Roseburg Forest Products Co.-Coquille is a plywood manufacturing facility located on Cedar Point Road near Coquille, Oregon.

Whole logs are brought to the facility by truck to be processed into finished plywood. The whole logs are initially debarked and cut to specific lengths, then steamed for a period of time to improve the veneer lathing process. The steamed logs are then cut into veneer. The veneer is dried, assembled and pressed into plywood. The rough cut plywood is further finished by repairing face imperfections, cutting, and sanding to final dimensions.

Hogged bark from whole logs and residual sanderdust are burned as fuel in a steam generating boiler. The steam is utilized throughout the facility with the predominant portion being directed to the veneer dryers.

Residual wood chips, shavings, and trim are captured and collected in storage bins for fuel burning or sale. Each collection bin is fitted with a particulate cyclone or cyclone/baghouse combination to reduce particulate related emissions.

## OPERATING SCENARIO AND DESCRIPTION OF EMISSIONS UNITS

4. Description of emissions units:
  - 4.a. EU Boiler 1 is a Garrett & Shafer bentwood tube spreader-stoker wood fired boiler. The rated design capacity is 111,000 lbs of steam per hour at 420°F and 350 psi. The wood fuel consists primarily of hogged bark with sawdust, shavings, and sanderdust mixed in. Particulate emissions are first controlled by a multiclone. The boiler and multiclone were installed in 1958. A dry ESP was installed in 2006 to further control particulate emissions.
  - 4.b. EU Dryer 1: Dryer 1 was manufactured by COE. It is a longitudinal steam heated dryer with 6 decks, a 1 zone system and maximum design capacity of 20.234 Msf/hr. The veneer dryer was installed in 1963 (modified in 1989 to a one zone) and the wet scrubber control system was added in 1989.
  - 4.c. EU Dryer 2: Dryer 2 was manufactured by COE. It is a longitudinal steam heated dryer with 6 decks, a 1 zone system and maximum design capacity of 20.234 Msf/hr. The veneer dryer was installed in 1965 (modified in 1991 to a one zone) and the wet scrubber control system was added in 1992.
  - 4.d. EU Dryer 3: Dryer 3 was manufactured by COE. It is a longitudinal steam heated dryer with 6 decks, a 1 zone system and maximum design capacity of 20.234 Msf/hr. The veneer dryer was installed in 1987 and the wet scrubber control system was added in 1992.
  - 4.e. EU Press 1: The plywood press is hydraulically driven and heated by steam. The maximum hourly production rate is now 29,350 ft<sup>2</sup>/hr on a 3/8" basis. The press was installed in 1992 and modified to increase capacity in 2005.
  - 4.f. EU Press 2: The plywood press is hydraulically driven and heated by steam. The maximum hourly production rate is 29,350 ft<sup>2</sup>/hr on a 3/8" basis. The press was installed in 2005.

4.g. EU Tunnels: Steam tunnels heat logs using steam prior to the lathe peeling process to make green veneer and were installed prior to 1978.

4.h. EU M1: Material handling emissions unit M1 consists of the following cyclones:

Device Description	ID Number	Rated Efficiency	Year Installed	Design Pressure Drop (inches of water)
Lilly Pad Chipper	C1	90	1973	3.75
4' Clipper	C2	90	1973	3.75
8' Clipper	C3	90	1973	3.75
Green Chips (1)	C4	90	1973	3.75
Green Chips Backup	C5	90	1973	3.75

\*Cyclones listed in this table are not really pollution control devices but are material handling devices.

\*Cyclones listed in this table are not really pollution control devices but are material handling devices. For cyclones which are followed by a baghouse, the baghouse is the control device.

4.i. EU Piles: This emissions unit consists of three hogged fuel and bark storage piles, one of which is inside a building.

4.j. EU Facility VOC: Facility VOC consists of fugitive VOC emissions from the overall manufacturing process.

4.k. EU Roads: This emissions unit consists of vehicular traffic on both paved and unpaved roads and parking lots at the facility.

4.l. EU Facility-1: This emissions unit is defined for the purpose of the annual PSEL and consists of emissions units Dryers 1-3, Boiler 1, M1, Presses 1-2, Facility VOC, Tunnels, Piles, Roads, and aggregate insignificant activities.

4.m. EU Facility-4: This emissions unit is defined for the purpose of the particulate matter process weight limit for plywood manufacturing and includes emission units Presses 1-2 and M1.

5. Categorically insignificant activities: The permittee has the following categorically insignificant activities on site:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under Divisions 20 through 32 of this chapter, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Janitorial activities
- Personal care activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- On-site laundry activities
- Instrument calibration
- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Air purification systems
- Demineralized water tanks

- Electrical charging stations
- Fire brigade training
- Process raw water filtration systems
- Blueprint making
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Log ponds
- Storm water settling basins
- Fire suppression and training
- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
- Non-contact steam condensate flash tanks
- Non-contact steam vents on condensate receivers, deaerators and similar equipment
- Boiler blowdown tanks
- Ash piles maintained in a wetted condition and associated handling systems and activities
- Oil/water separators in effluent treatment systems
- Combustion source flame safety purging on startup

6. The emissions from the following activities are included in the aggregate insignificant emissions:

Pollutant	Emission Source	AI Emissions (tons/yr)
VOC	Plywood Resin Storage Tanks	0.12
PM/PM <sub>10</sub>	Barker	0.06/0.03
	M2	0.44

- 6.a. VOC from three plywood resin storage tanks
- 6.b. PM/PM<sub>10</sub> from Barker
- 6.c. PM/PM<sub>10</sub> from M2: Material handling emissions unit M2 consisting of the following:

Device Description	ID Number	Year Installed	Manufacturer	Design Air-to-Cloth Ratio	Number of Bags	Design Pressure Drop (inches of water)
Plytrim Cyclone & Baghouse	C6A C6B	2005	Western Pneumatics	5.52:1	386	0.7
Sanderdust Cyclone 1 & Baghouse	C7A C7B	1975	Hammerquist	10:1	18	6
Sanderdust Cyclone 2 & Baghouse	C8A C8B	1975	Hammerquist	10:1	18	6

Sanderdust Cyclone 3 & Baghouse	C9A C9B	1975	Hammerquist	10:1	18	6
Sanderdust Silo & Baghouse	C10A C10B	2002	Clarke	4:1	20 20 20	2
Pre-Boiler Sanderdust Silo Cyclone & Baghouse	C11A  C10B	2002	Clarke	4:1	20 20 20	2
Dry Hog Cyclone	C12A	1975	N/A	N/A	N/A	N/A

\*Cyclones listed in this table are not really pollution control devices but are material handling devices. For cyclones which are followed by a baghouse, the baghouse is the control device.

## PLANT SITE EMISSION LIMIT (PSEL)

### BASELINE EMISSION RATE

7. The operating schedule for the baseline year 1978 was:

- 7.a. Veneer dryers: 24 hrs/day x 6.199 days/week x 50 weeks/year = 7,439 hrs/yr
- 7.b. Boiler 1: 24 hrs/day x 6.199 days/week x 50 weeks/year = 7,439 hrs/yr
- 7.c. Plywood Plant: 24 hrs/day x 5 days/week x 52 weeks/year = 6,240 hrs/yr

8. Reported plant production for the baseline year 1978 was:

- 8.a. Plywood (3/8" basis) 128,062,000 sq ft/yr
- 8.b. Logs steamed in tunnel (3/8") 99,761,000 sq ft/yr
- 8.c. Veneer dried (DF, pine, cedar) (3/8") 107,350,000 sq ft/yr
- 8.d. Veneer dried (White fir) (3/8") 18,181,000 sq ft/yr
- 8.e. Veneer redried (3/8") 8,155,000 sq ft/yr
- 8.f. Amount of steam generated in boiler 1 595,120,000 lbs/yr
- 8.g. Amount of hogged fuel burned in boiler 1 48,000 BDT/yr

9. The baseline PSELs were determined using the information listed above. In addition, the baseline PSELs have been corrected since the last permit to include baseline emissions from the steam tunnels and to account for better or updated emission factors. The corrected 1978 baseline emission calculations are shown in the attached detail sheets.

### PROPOSED PLANT SITE EMISSION LIMIT

10. The proposed operating schedule is different from the baseline year and is shown below:

$$24 \text{ hrs/day} \times 7 \text{ days/wk} \times 50 \text{ wks/yr} = 8,400 \text{ hrs/yr}$$

11. The proposed plant production is different from the baseline year and is shown below (a more detailed breakdown can be found in the detail sheets):

- 11.a. Veneer dried (DF, pine, cedar) (3/8") 180,930,000 sq ft/yr
- 11.b. Veneer dried (WF)(3/8") 100,000,000 sq ft/yr
- 11.c. Veneer redried (3/8") 42,140,000 sq ft/yr
- 11.d. Plywood (3/8" basis) 265,000,000 sq ft/yr
- 11.e. Amount of steam generated in boiler 1 678,000,000 lbs/yr
- 11.f. Logs steamed in tunnel (3/8") 318,933,000 sq ft/yr
- 11.g. Amount of hogged fuel burned in boiler 1 65,974 BDT/yr

12. The proposed annual Plant Site Emission Limit calculations are shown in the attached detail sheets and are summarized below.

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	203	214	203	236	108	-128
PM <sub>10</sub>	116	152	116	166	92	-74
CO	75	46	75	50	99	+49
NO <sub>x</sub>	65	64	65	71	74	+3
SO <sub>2</sub>	15	4	15	5	39	+34
VOC	108	67	108	105	187	+82
Pb	0.03	Negl.	0.03	0.06	NA	NA

- 12.a. The baseline and netting basis period is 1978 for all pollutants. Baseline emissions have been recalculated in this permit action based on updated emission factors and source test results. In accordance with OAR 340-200-0020(71), the baseline emission rate has now been “frozen” since this permitting action is occurring after 7/1/02.
- 12.b. The netting basis is also equal to the baseline emission rates for all pollutants, since the facility has not had any Prevention of Significant Deterioration approvals under OAR 340-224-0070 and no rule reductions have been required since baseline for those pollutants.
- 12.c. In accordance with OAR 340-222-0041(2), the proposed PSELs for PM and PM<sub>10</sub> are being set at the source’s potential to emit. In accordance with OAR 340-222-0020(3)(a), no PSEL is being established for Pb as the potential emissions of Pb are less than the Department’s de minimis level in OAR 340-200-0020(31). In accordance with OAR 340-222-0041(3)(a), the proposed PSEL for NO<sub>x</sub> is being set at the source’s potential to emit. In accordance with OAR 340-222-0041(3)(b)(C), the proposed PSEL for VOC is being set at the source’s potential to emit. The SO<sub>2</sub> and CO PSELs are being set at the generic PSEL level in accordance with OAR 340-222-0041(1).
- 12.d. The changes in the PSELs for all pollutants from the last permit reflects both proposed production or fuel usage changes and emission factor changes and source test results since the last permit as well as elimination of veneer dryer emissions from two dryers and installation of an ESP on the hog fuel boiler. Emission factor updates reflect changes to AP-42 and results of more recent source tests at the facility. In addition, the VOC emission factors for baseline and proposed wood product operations reflects the Department’s VOC guidance where total VOCs are calculated as propane along with the addition of methanol and formaldehyde emissions when known.

#### COMPONENTS OF THE PROPOSED PSEL

The components of the proposed PSEL are as follows until July 1, 2007:

Pollutant	PSEL (tons/yr)	Unassigned Emissions (tons/yr)
PM	108	95
PM <sub>10</sub>	92	24
CO	99	-0-
NO <sub>x</sub>	74	-0-
SO <sub>2</sub>	39	-0-
VOC	187	-0-

After July 1, 2007, the unassigned emissions will be reduced to the SER (if not already less than the SER) for each pollutant and the components of the PSEL will be as follows:

Pollutant	PSEL (tons/yr)	Unassigned Emissions (tons/yr)
PM	108	25
PM <sub>10</sub>	92	15
CO	99	-0-
NO <sub>x</sub>	74	-0-
SO <sub>2</sub>	39	-0-
VOC	187	-0-

On July 1, 2007, the netting basis for the facility will also be reduced by the amount of the unassigned emissions which were reduced and the netting basis for the facility at that time will become:

Pollutant	Old Netting Basis (tons/year)	Unassigned Emission Reduction (tons/year)	New Netting Basis (tons/year)
PM	203	70	133
PM <sub>10</sub>	116	9	107
CO	75	-0-	75
NO <sub>x</sub>	65	-0-	65
SO <sub>2</sub>	15	-0-	15
VOC	108	-0-	108
Pb	0.03	-0-	0.03

#### SIGNIFICANT EMISSION RATE COMPARISON

Pollutant	SER	Requested increase over netting basis	Increase due to utilizing capacity that existed in the baseline period	Increase due to physical changes or changes in the method of operation	Increase due to changes in rules (OAR 340-222- 0041(1))
PM	25	-95	-122	27	-0-
PM <sub>10</sub>	15	-24	-51	27	-0-
SO <sub>2</sub>	40	+24	2	-0-	22
NO <sub>x</sub>	40	+9	9	-0-	-0-
CO	100	+24	10	-0-	14
VOC	40	+79	8	71	-0-

The proposed Plant Site Emission Limits are less than the netting basis or less than the netting basis plus the Significant Emission Rate for all pollutants except VOC so no further air quality analysis is required for those pollutants.

Although the requested VOC increase exceeds the Significant Emission Rate over the netting basis, there is no ambient standard for VOCs and no PSD increments. Although VOCs are a precursor to ozone (for which there is an ambient standard) formation, the formation of ozone typically occurs far downwind from a source when the precursors (VOC and NO<sub>x</sub>) react in the presence of sunlight. The formation rates of ozone are strongly influenced by atmospheric conditions as well as the proximity to and magnitude of other sources (industrial, mobile, and area sources) of the precursor pollutants. As such, the reactions are extremely complex, not easily estimated, and do not generally occur along the Oregon coast. As a result, the Department is not requiring ozone dispersion modeling for this requested VOC increase.

Because the emissions increase for VOC is not going through a full PSD analysis, the netting basis for this pollutant does not change.

The following new process equipment has been added since the baseline period.

Equipment	Installation Date
Press 1	1992 & 2005
Press 2	2005
Veneer Dryer 3	1987
Plywood layup line	2006
Veneer Dryer 1 stacker	2006

The following process equipment has been shut down since the baseline period.

Equipment	Removal Date
Veneer Dryer 3	2005
Veneer Dryer 4	2005

The following control equipment has been added since the baseline period.

Control Equipment	Installation Date
Dry ESP 1	2006
Veneer dryer wet scrubber 1	1989
Veneer dryer wet scrubber 2	1992
Veneer dryer wet scrubber 3	1992
Preboiler sanderdust silo cyclone and baghouse	2002
Sanderdust silo and baghouse	2002
Plytrim cyclone and baghouse	2005

## HAZARDOUS AIR POLLUTANTS

13. The facility is a major source of Hazardous Air Pollutants and is subject to two MACT standards:
- 13.a. 40 CFR Part 63 Subpart DDDD National Emission Standards for Hazardous Air Pollutant from Plywood and Composite Wood Products Manufacturing are applicable to a number of emission units in the plywood production plant. The facility must be in compliance with the limits and standards of this MACT by no later than October 1, 2008 or may risk out by that date. The company sent the initial notification on 1/1/05.
- 13.b. 40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, and Institutional Boilers and Process Heaters are applicable to EUs Boilers 1 & 2. The facility must be in compliance with the limits and standards of this MACT by no later than September 13, 2007 or may use the Health Based Compliance Alternative by that date. The company sent the initial notification on 3/2/05.

Estimated HAP emissions from the facility are as follows prior to implementation of the Plywood and Boiler MACTs, although metal HAP and mercury emissions already assume 90% control by the new ESP on Boiler 1:

Hazardous Air Pollutant	Emissions (tons/year)
Formaldehyde	10.9
Acetaldehyde	15.5
Phenol	2.6
Hydrogen chloride	6.5
Metal HAP compounds	0.05
Mercury	0.0001
Methanol	14.4
TOTAL	50.0

HAP emissions following implementation of the Plywood and Boiler MACTs cannot be estimated at this time due to uncertainty as to how the facility will be required to comply with the Plywood MACT.

## **MONITORING REQUIREMENTS**

14. Section 70.6(a)(3)(i) requires that all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirement to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3)(i).

### **COMPLIANCE ASSURANCE MONITORING:**

Only Boiler 1 is subject to CAM because the potential uncontrolled particulate emissions are greater than 100 tons per year and the unit is subject to emissions standards for particulate matter.

For Boiler 1, a continuous opacity monitor (COMs) will be used to record opacity from the boiler. The ESP and multiclones will be periodically inspected for any problems that could affect their collection efficiency and repaired as necessary. In addition, the ESP operational status will be monitored continuously by a parameter monitoring system for ESP voltage with an action level of 30 kilovolts or less.

15. Emission factor verification testing is required in order to improve the database of emission factors. As stated in the permit, the emission factors are not enforceable limits unless otherwise specified (e.g., grain loading). If the emission factor verification testing determines that the emission factor should be much higher than what was used in the permit, the Department will investigate the reasons of the discrepancy. If the unit was operating efficiently and the discrepancy in emission factors is due to process or source test variability, the Department will administratively amend the permit or wait until permit renewal to change the emission factor. The permittee would continue to use the original emission factor in the permit for monitoring compliance.

## **TEST METHODS AND PROCEDURES**

16. Periodic source testing of the boiler and veneer dryers is required to demonstrate compliance and verify that compliance is achieved while operating within certain specified parameter operating ranges.

## **RECORDKEEPING REQUIREMENTS**

17. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions. The permittee is required to retain all records of monitoring for a 5 year period. These records shall be made available to DEQ inspectors upon request.

## **REPORTING REQUIREMENTS**

18. The permittee is required to submit reports to the Department semi-annually and annually. The semi-annual reports are for certifying compliance with the terms and conditions of the permit. The report will include a list of all permit deviations, the probable cause, and the corrective action as a result of the deviation. In addition, the annual report will include the plywood production, veneer dryer wood material throughput, boiler steam, and other production information.

In addition, the permittee is required to notify the Department before each source test and submit summaries or complete source tests reports after each test.

19. The source is subject to immediate (within one hour) reporting of excess emissions.

#### **GENERAL BACKGROUND INFORMATION**

20. Other permits issued or required by the Department of Environmental Quality for this source include three General NPDES permits for discharges of stormwater, log pond water, and noncontact cooling water and a Solid Waste Disposal Permit.
21. This source is located in an area that is in attainment for all pollutants.
22. The source is not located within 100 kilometers of any Class I air quality protection areas.

#### **COMPLIANCE HISTORY**

23. Inspections of the facility were performed on 8/25/99, 8/31/00, 9/18/01, 8/26/03, 9/28/04, and 7/11/06. Since issuance of the original Title V permit, the following violations have been noted:
- 23.a. A Notice of Noncompliance was issued on 4/23/01 for exceeding opacity limits for Boiler 1 and offsite wooddust deposition.
- 23.b. A Notice of Noncompliance was issued on 3/10/02 for failure to record the veneer dryer scrubber exhaust temperature.
- 23.c. A civil penalty of \$5000 was assessed on 1/25/02 for exceeding opacity limits for Boiler 1 on 8/12/01.

#### **ADDITIONAL REQUIREMENTS**

24. This source is not currently subject to federal regulations for New Source Review.
25. This source is not currently subject to federal regulations for Prevention of Significant Deterioration (PSD).
26. This source is currently subject to the two federal regulations for National Emissions Standards for Hazardous Air Pollutants (NESHAPS) shown in Item 13.
27. This source is not currently subject to federal New Source Performance Standards.

#### **PUBLIC NOTICE**

28. Because this is a renewal of a Title V permit, which is a Category III permitting action, the permit will be placed on a 35-day public notice period from January 17, 2007, to February 22, 2007. Comments may be submitted in writing during the comment period. The Department will hold a public hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals. After the comment period and hearing, if requested, the Department will review the comments and modify the permit as may be appropriate. A proposed permit will then be sent to EPA for a 45 day review period. The Department may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period. In any event, the public will have 105 days (45 day EPA review period plus 60 days) from the date the proposed permit is sent to EPA to appeal the permit with EPA. The permit will be issued following EPA's review.

#### **ATTACHMENTS**

##### **EMISSION DETAIL SHEETS**

Proposed Emissions  
Baseline Emissions

##### **COMPARISON TABLES**

Production Changes  
Production Rates  
Actual Emissions

Emission Factor Changes