

# ADEQ

ARKANSAS  
Department of Environmental Quality

JAN 29 2018

Brett Bray, General Manager  
Caddo River LLC  
229 South Spur 8  
Glenwood, AR 71943

Dear Mr. Bray:

The enclosed Permit No. 0189-AOP-R8 is your authority to construct, operate, and maintain the equipment and/or control apparatus as set forth in your application initially received on 9/27/2017.

After considering the facts and requirements of A.C.A. §8-4-101 et seq. as referenced by §8-4-304, and implementing regulations, I have determined that Permit No. 0189-AOP-R8 for the construction and operation of equipment at Caddo River LLC shall be issued and effective on the date specified in the permit, unless a Commission review has been properly requested under Arkansas Department of Pollution Control & Ecology Commission's Administrative Procedures, Regulation 8, within thirty (30) days after service of this decision.

The applicant or permittee and any other person submitting public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decisions as provided under Chapter Six of Regulation No. 8, Administrative Procedures, Arkansas Pollution Control and Ecology Commission. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201. If you have any questions about filing the request, please call the Commission at 501-682-7890.

Sincerely,



Stuart Spencer  
Associate Director, Office of Air Quality

Enclosure: Final Permit

**RESPONSE TO COMMENTS**

**CADDO RIVER LLC  
PERMIT #0189-AOP-R8  
AFIN: 55-00017**

On December 14, 2017 and December 21, 2017, the Director of the Arkansas Department of Environmental Quality gave notice of a draft permitting decision for the above referenced facility. During the comment period, written comments on the draft permitting decision were submitted on behalf of the facility. The Department’s response to these issues follows.

*Note: The following page numbers and condition numbers refer to the draft permit. These references may have changed in the final permit based on changes made during the comment period.*

**Comment #1:**

Startup operations of the kilns will typically be conducted using wood pieces and not sawdust as indicated in Specific Condition 8. The facility proposes the following revised condition.

8. The permittee shall not exceed the limits specified in the following table. [Reg.19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]

SN	Diesel fuel usage limit as starter fluid	Wood throughput limit for gasifier/burner during startup	Operating Hour Limits for each Abort Stack
18	1,200 gallons per rolling 12-months	2000 lb per hour	240 hours per rolling 12-months
19	1,200 gallons per rolling 12-months	2000 lb per hour	240 hours per rolling 12-months

**Response to Comment #1:**

The permit has been updated as requested.

**Comment #2:**

It is requested that the source description be updated to reflect the ability to store dried lumber in a cooling shed or outside as needed. The facility proposes the following revised language.

Source Description

After the lumber is dried, it is placed in a cooling shed or outside. The lumber is then planed and trimmed in the planer mill. The shavings and dust from the planer mill are sent to the planer mill cyclone/baghouse (SN-05).

**Response to Comment #2:**

The permit has been updated as requested.

# ADEQ OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 0189-AOP-R8

IS ISSUED TO:

Caddo River LLC  
229 South Spur 8  
Glenwood, AR 71943  
Pike County  
AFIN: 55-00017

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

June 13, 2016 AND June 12, 2021

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:



Stuart Spencer  
Associate Director, Office of Air Quality

JAN 29 2018

Date

Caddo River LLC  
Permit #: 0189-AOP-R8  
AFIN: 55-00017

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#### List of Acronyms and Abbreviations

Ark. Code Ann.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO <sub>2</sub>	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound
NCAP	Non-Criteria Air Pollutant (includes HAPs and air contaminants)

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SECTION I: FACILITY INFORMATION

PERMITTEE: Caddo River LLC

AFIN: 55-00017

PERMIT NUMBER: 0189-AOP-R8

FACILITY ADDRESS: 229 South Spur 8  
Glenwood, AR 71943

MAILING ADDRESS: 229 South Spur 8  
Glenwood, AR 71943

COUNTY: Pike County

CONTACT NAME: Brett Bray

CONTACT POSITION: General Manager

TELEPHONE NUMBER: (479) 857-9902

REVIEWING ENGINEER: Joseph Hurt

UTM North South (Y): Zone 15: 3799654.56 m

UTM East West (X): Zone 15: 448203.03 m

## SECTION II: INTRODUCTION

### Summary of Permit Activity

Caddo River LLC (AFIN: 55-0017) owns and operates a lumber sawmill located in Glenwood, Pike County, Arkansas (formerly owned by Bean Lumber Company, Inc.). Caddo purchased the lumber mill in December of 2015. With this permitting action, Caddo proposes to convert the existing Dry Kiln # 3 from a steam heated batch kiln to a direct fired dual path kiln, DPK # 3 (SN-04). The project also includes a new Kiln # 3 Fuel Bin as an insignificant activity, and adding a baghouse to the Planer Mill Shavings operation (SN-05). The facility also requested to remove the existing Wood Waste Boiler (SN-01), Dry Kiln # 1 (SN-02), Dry Kiln # 2 (SN-03), and Bark Bin (Insignificant activity A-13). The total permitted emission increases include 7.7 tpy of VOC, 0.0153 tpy of Lead, 8.92 tpy of total chargeable NCAPs, and 28.03 tpy of total other NCAPs. The total permitted emission decreases include 116.0 tpy of PM, 69.3 tpy of PM<sub>10</sub>, 25.3 tpy of SO<sub>2</sub>, 190.4 tpy of CO, 252.7 tpy of NO<sub>x</sub>, and 19.03 tpy of Methanol.

### Process Description

Logs are received at the facility and stored in the log yard until processed. For processing, logs are placed in the log deck until needed in the sawmill. Once demanded for production, logs are placed on the bucking system infeed deck to be cut to the most desirable length. The logs are then processed through the debarker. The bark and smaller chips are removed. The debarked logs move through the sawmill to be cut to the optimum size which realizes the best yield for each log. The wood that is undesirable for boards is sent to the chipping machine to be converted to chips. After the logs are cut into boards, the boards are mechanically sorted by dimension and stacked. The debarking and sawmill cutting activities occur in fully enclosed buildings with only openings for the conveyors that route the logs through the process. Bark from the debarker is mechanically conveyed to the Bark Pile. Chips from the sawmill and sawmill chippers are mechanically conveyed to the Chip Bins. Sawdust from the sawmill is mechanically conveyed to the Sawdust Shed/Bins. Trucks pull under the designated bin, the bottom of the bin is opened, and the material is gravity fed into the truck. The Bark Pile, Chip Bins, and Sawdust Bins are included on the Insignificant Activities table as Group A-13 sources.

The rough green lumber is then transferred by fork lift to a storage area to be held until it is sold as green lumber or sent to one of two direct biomass fired dual path kilns (DPKs), DPK #3 (SN-04) and DPK #4 (SN-04A) for drying. Sawdust is mechanically conveyed into the Kiln Fuel Shed then mechanically conveyed to the Kiln Fuel Bins before being fed, as needed, into the kilns by enclosed belt conveyance. After the lumber is dried in the kilns, it is stacked outside or placed in a cooling shed. After cooling, the lumber is planed and trimmed at the planer mill. The shavings and dust from the planer mill are conveyed by the planer mill cyclone before being routed to the Planer Mill Shavings Bin Cyclone/Baghouse (SN-05), which drops the shavings into the bin and the baghouse controls emissions from the cyclone exhaust. From the shavings bin, the wood residue is loaded into trucks (SN-05A) and hauled offsite. The finished lumber is stacked into predetermined amounts, bundled, and stored ready for shipping by truck or rail.



## PSD Applicability

A new source is a “major stationary source” under the Prevention of Significant Deterioration (PSD) regulations 40 CFR 52.21 (b)(1) if any source that emits or has the potential to emit over 100 tons per year (tpy) of any New Source Review (NSR) regulated pollutant, and is one of the 28 specifically listed industrial source categories. Sawmills are not on the list of specified industrial source categories; therefore, the applicable definition of “major stationary source” under the PSD regulations is any source that emits or has the potential to emit 250 tpy or more of any NSR regulated pollutant.

Under the revised PSD/NSR rules in 40 CFR §52.21, which have been incorporated by reference into Arkansas Regulation 19, a “major modification” is defined as a physical change or change in the method of operation of a major stationary source that results in both:

- A significant emission increase, as defined in §52.21(b)(40), of a regulated NSR pollutant, as defined in §52.21 (b)(50) and,
- A significant net emission increase of that pollutant from the major stationary source.

The first step in evaluating the PSD applicability for a proposed change is to evaluate the emission changes resulting from the proposed project according to §52.21 (a)(2)(iv). If the emission changes determined according to §52.21 (a)(2)(iv) are below the PSD significant emission rates (SERs), then the modification is not a “major modification” and a determination of the contemporaneous net emissions increase is not required for that pollutant.

## Prevention of Significant Deterioration (PSD)

This submission addresses the Dry Kiln #4 (SN-04A) conversion project, the Planer Mill Shavings Bin Cyclone (SN-05) replacement project, and the Dry Kiln #3 (SN-04) conversion project. These proposed projects constitute physical changes and thus require review to determine if a major modification will occur as defined by 40 CFR §52.21(b)(2) as incorporated by §19.903(B) of ADEQ Regulation 19.

All three of the projects are independent projects as each project is financially and technically feasible without the other two. However, given the proximity in timing of the projects, Caddo River has conservatively evaluated all three projects as a single project in the analysis below.

### Dry Kiln #4 (SN-04A) Conversion Project

In September 2016, Caddo River submitted an application to modify the existing Dry Kiln #3 (SN-04A) from a steam heated batch kiln to a direct fired dual path kiln (DPK) (SN-04A) and to add two new Group A-13 Insignificant Activities, the Kiln Fuel Shed (A-13), and the Kiln Fuel Bin (A-13).

This project was determined to be major modification pursuant to PSD for VOC only and ADEQ authorized construction for this project with air permit #0189-AOP-R6.

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### Planer Mill Shavings Bin Cyclone (SN-05) Replacement Project

The existing planer mill shaving bin cyclone was installed at the facility in 1981 and has not obtained the reliability required for the existing planer mill operations. The facility proposes to replace the existing planer mill shavings bin cyclone with a new cyclone followed by a baghouse. The new Planer Mill Shavings Bin Cyclone/Baghouse (SN-05) will better capture the transferred shaving emissions, resulting in a 5 tpy permitted decrease in PM and PM<sub>10</sub> emissions.

### Dry Kiln #3 (SN-04) Conversion Project

This project proposes to convert the existing Dry Kiln #3 from a steam heated batch kiln to a direct fired DPK, DPK #3 (SN-04). The proposed kiln conversion will increase the kiln's production capacity from 8 MBf/hr to 14 MBf/hr. The converted kiln will utilize green sawdust as fuel in a 36 MMBtu/hr burner. The project will also include a new Group A-13 Insignificant Activity, Kiln #3 Fuel Bin (A-13).

### Projects Summary

As currently permitted, the mill's total annual permitted capacity of 185,000,000 board feet of lumber through the drying kilns (SN-02, SN-03, SN-04, and SN-04A) at Specific Condition 18 of Permit 0189-AOP-R7 is a "bottleneck" and constrains other unmodified emissions units at the mill. The facility requests to keep the mill's current federally enforceable permit limit of 185,000,000 board feet per 12 months for (SN-04 and SN-04A). The proposed project does not increase the full design capacity or maximum output rating of any unmodified emission units. Therefore, the ancillary sources (SN-05A, SN-17, and A-13) are not included in this analysis.

### Significant Emission Increase

According to 40 CFR §52.21 (a)(2)(iv)(b), the procedure for calculating whether a significant emission increase will occur depends on the type of emission units being modified. These procedures are outlined in §52.21 (a)(2)(iv)(c)-(f). As a change to an existing facility involving both new and modified emission units, the hybrid applicability test of §52.21 (a)(2)(iv)(f) is the relevant method for calculating the emission increase associated with the project. The hybrid test requires the addition of emission increases using the actual-to-projected-actual applicability test for existing emission units: DPK #4 (SN-04A) and abort stack (SN-19), the Planer Mill Shavings Bin Cyclone/Baghouse (SN-05), DPK #3 (SN-04) and abort stack (SN-18) and emission increases using the actual-to-potential test for the new emission units: Kiln No. 4 Fuel Bin (IA A-13), Kiln Fuel Shed (IA A-13), Kiln No. 3 Fuel Bin (IA A-13).

### Actual-to-Projected-Actual Test

To determine the Baseline Actual Emissions (BAE), a facility is allowed to select any consecutive 24-month period over the ten years preceding commencement of construction or the date a complete permit application is received for the project, whichever date is earlier. For the purposes of this review, the period of July 2008 through June 2010 was selected as the baseline period for each NSR pollutant. The facility wide kiln production (bf/mo) and planer mill shavings bin throughput (ton<sub>shavings</sub>/mo) are based on the information from the semi-annual

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monitoring reports submitted to ADEQ during the lookback period. The baseline production through Dry Kiln #3 and Dry Kiln #4 is calculated based on production capacity of the kilns during the baseline period. Detailed PTE calculations can be found in the calculations section of the application.

Actual-to-Projected-actual test (ATPA): Modified and Debottlenecked Sources									
Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	SO <sub>2</sub>	NO <sub>x</sub>	CO	Lead	CO <sub>2e</sub>
DPK#3 (SN-04) BAE	0	0	0	0	--	--	--	--	--
DPK#4 (SN-04A) BAE	0	0	0	0	--	--	--	--	--
DPK #3 and #4 Abort stacks BAE	0	0	0	0	0	0	0	0	0
Planer Mill Shavings Bin Cyclone (SN-05) BAE	0.45	0.45	0.45	--	--	--	--	--	--
Total ATPA BAE	0.45	0.45	0.45	0	0	0	0	0	0
DPKs #3 (SN-04) and #4 (SN-04A) PTE	12.95	9.62	9.16	351.50	7.88	25.90	80.42	0.02	66,085
DPK #3, #4 Abort Stacks PTE	0.72	0.63	0.54	0.04	0.06	0.50	0.374	0.0001	103
Planer Mill Shavings Bin Cyclone/Baghouse (SN-05) PTE	0.45	0.45	0.45	--	--	--	--	--	--
Total PAE	14.12	10.70	10.15	351.54	7.95	26.40	80.79	0.02	66,188
<b>Total ATPA Debottlenecked Sources Emission Increase</b>	<b>13.67</b>	<b>10.25</b>	<b>9.70</b>	<b>351.54</b>	<b>7.95</b>	<b>26.40</b>	<b>80.79</b>	<b>0.02</b>	<b>66,188</b>

Actual-to-Potential Test

For the initial permitting of a new emission source, the facility is required to set the BAE equal to 0 tpy. Detailed PTE calculations can be found in the calculations section of the application.

Actual-to-Potential test (ATP): New Sources									
Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	SO <sub>2</sub>	NO <sub>x</sub>	CO	Lead	CO <sub>2e</sub>
Kiln Fuel Shed (IA A-13) BAE	0	0	0	0	--	--	--	--	--
Kiln #4 Fuel Bin (IA A-13) BAE	0	0	0	0	--	--	--	--	--
Kiln #3 Fuel Bin (IA A-13) BAE	0	0	0	0	--	--	--	--	--
Total ATP BAE	0	0	0	0	0	0	0	0	0

Actual-to-Potential test (ATP): New Sources									
Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	SO <sub>2</sub>	NO <sub>x</sub>	CO	Lead	CO <sub>2e</sub>
Kiln Fuel Shed (IA A-13) PTE	0.116	0.009	0.009	--	--	--	--	--	--
Kiln #4 Fuel Bin (IA A-13) PTE	0.058	0.005	0.005	--	--	--	--	--	--
Kiln #3 Fuel Bin (IA A-13) PTE	0.058	0.005	0.005	--	--	--	--	--	--
Total PTE	0.232	0.019	0.019	0	0	0	0	0	0
<b>Total ATP Debottlenecked Sources Emission Increase</b>	<b>0.232</b>	<b>0.019</b>	<b>0.019</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Hybrid Test

The total increases from both the actual-to-projected-actual test and the actual-to-potential test are summed together to determine the total project increases. These increases are compared against the SER for each NSR pollutant.

Hybrid Test: Summary									
Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC	SO <sub>2</sub>	NO <sub>x</sub>	CO	Lead	CO <sub>2e</sub>
Total ATPA Test Emission Increase	13.67	10.25	9.70	351.54	7.95	26.40	80.79	0.02	66,188
Total ATP New Source Emission Increase	0.232	0.019	0.019	0	0	0	0	0	0
Hybrid Test Total Emission Increase	13.902	10.269	9.719	351.54	7.95	26.40	80.79	0.02	66,188
PSD Significant Emission Rate (SER)	25	15	10	40	40	40	100	0.6	75,000
<b>Total ATP New Sources Emission Increase</b>	<b>55.6%</b>	<b>68.5%</b>	<b>97.2%</b>	<b>879%</b>	<b>20%</b>	<b>66%</b>	<b>80.8%</b>	<b>2.5%</b>	<b>88.3%</b>

As shown above, the proposed project exceeds the SER and has a significant emission increase for Volatile Organic Compounds (VOC) only. If contemporaneous emissions decreases are available, emission netting can be performed to determine if the overall net emission increase for the pollutant is below their respective SERs (considering both contemporaneous and creditable increases and decreases). However, Caddo River has elected not perform an emission netting review. Therefore, the evaluation of the significant emission increase as outlined above is sufficient.

As Caddo River is subject to PSD for VOC, review of the Best Available Control Technology (BACT) for the control of VOC was completed as required by Federal PSD regulation, 40 CFR

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§52.21(j). The BACT summary outlines the control technology analysis completed to ensure the application of BACT for VOC.

### Ambient Air Impact Analysis

Additionally, the PSD required impact analysis of the ambient air impacts associated with the project was completed. The purpose of the analysis is to demonstrate that the emissions from the proposed project, in conjunction with applicable emissions increases and decreases from existing and “proposed” new off-site sources, will neither cause nor contribute to a violation of the National Ambient Air Quality Standard (NAAQS). There are separate increment standards for Class I areas (federally protected lands) and Class II areas (all other areas). A PSD impact analysis for this project is required only for ozone of which VOC is a precursor, not for VOC.

### Ozone Impact Analysis

VOC and NO<sub>x</sub> are recognized as precursors to ozone, which has an established NAAQS. Since the project has a significant emissions increase of VOC, an evaluation in terms of VOC effect on attainment status of ozone is required. Pursuant to 40 CFR §52.21(m), air quality monitoring must be conducted for each pollutant potentially emitted at a significant emission rate by the proposed source or modification. Therefore, a pre-construction ambient monitoring analysis would be required for ozone emissions, and monitoring data would be required to be submitted as part of the application. As demonstrated below, the pre-construction monitoring is fulfilled with the existing monitoring stations operated by the Arkansas Department of Environmental Quality (ADEQ), as the monitoring is representative of the conditions at the facility.

The two ozone monitoring sites that best represent the ozone concentration in the region surrounding the Caddo River facility are the Caddo Valley station (05-019-9991) and the Eagle Mountain station (05-113-0003). These monitors were identified based on the proximity to the facility and the similarity of the surrounding air shed in the region of the monitoring station to Caddo River. Note that both Little Rock (126 - 130 km) and Shreveport (187 - 200 km) metropolitan areas have multiple monitors, but these monitors’ ozone concentrations are driven by their urban air shed and are not representative of the rural nature of Caddo River. The 4<sup>th</sup> high daily maximum 8-hour concentration averaged over 3 years (2014-2016) design value for each monitor location and the NAAQS primary standard are shown in the following table as obtained from EPA Air Data Ozone Design Values, (<https://www.epa.gov/air-trends/air-qualitydesign-values#report>).

Location	County	Distance (km)	2014 – 2016 Design Value (ppm)	NAAQS Primary Standard (ppm)
Caddo Valley	Clark County, AR	46	0.058	0.070
Eagle Mountain	Polk County, AR	54	0.062	

The increase in ozone formation from the proposed kiln conversion at the Caddo River facility is expected to be insignificant. The total potential emission increases associated with the project is 351.54 tpy VOC and 26.4 tpy NO<sub>x</sub>. This represents a total emitted VOC increase of 1.7% over a

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2014 baseline (20,616 tpy) and a NO<sub>x</sub> increase of 5.1% over a 2014 baseline (522 tpy) from Pike County as obtained from EPA Air Data County Emissions Map, 2014 (<http://www.epa.gov/air/emissions/>). Only accounting for the baseline emissions from Pike County, the ratio of VOC to NO<sub>x</sub> is 39.5:1. This approach is a conservative estimation of the VOC to NO<sub>x</sub> ratio as it does not account for the less industrially developed surrounding counties and other regional impacts. The proposed project will have a negligible impact on this ratio. Based on the Pike County area's low concentration of ozone, attainment status, and continued declining background concentration (in decline from 2006 to 2016), along with the Caddo River projected VOC emissions presenting a minor increase in total VOC emissions, there is no expected effect on the attainment status of the region.

### Additional Impacts Analysis

The potential impact of the proposed project's air pollutant emissions associated with construction and related growth are presented in this section as well as assessment of the impact on soil, vegetation, and visibility. A qualitative approach has been taken to these analyses for areas which do not have well established analytical techniques.

### Construction and Growth Impacts

The proposed project has little effect on construction and growth impacts. During construction, Caddo River will minimize the impact on the surrounding environment primarily focusing on reduction of the formation of fugitive particles.

The construction and operation from the project at Caddo River should not result in any noticeable residential growth in the area. There is expected gradual commercial growth in the area; however, this growth is not expected to be directly due to the proposed project at the Caddo River facility.

### Impact on Soil and Vegetation

The effects of air pollution on vegetation can be classified into three distinct categories: acute, chronic, and long-term. Acute effects are those resulting from a short exposure (< 1 month) to high concentrations. Chronic effects refer to those developed from exposure to a threshold level of pollutant over months or years. Long-term effects refer to abnormal changes in ecosystems and subtle physiological alterations in organisms. Both acute and chronic effects can be the result of an air borne pollutant acting directly on an organism while long-term effects can be indirectly caused by secondary effects such as changes in soil pH.

The secondary NAAQS are intended to protect the public welfare from adverse effects of airborne pollutants. This protection extends to soil and vegetation. Predicted concentrations of VOC resulting from the kiln project will not significantly impact ozone concentration and will not cause or contribute to violation of the NAAQS. Because the NAAQS were established to protect soil and vegetation, no significant impacts on the soil and vegetation are expected due to the proposed project.

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In addition to BACT, Caddo River will utilize good working practices for equipment associated with the proposed kiln project. The combination of BACT, good work practices, and minimal air quality impacts will result in minimal impact on the soil and vegetation in and around the site.

#### Analysis of Endangered Species

An air quality impact analysis has been performed for VOC. The proposed project will result in potential impacts below the secondary NAAQS. It is possible that some endangered species may be present in Pike County; however, through compliance with the NAAQS, Caddo River does not expect to have an impact on any endangered species. According to the U.S. Fish and Wildlife Service, the currently endangered species possibly located in Pike County are two species of clams, the Pink Mucket and Pondberry.

In addition to BACT, Caddo River will utilize good working practices for equipment associated with the proposed project. The combination of BACT, good work practices, and minimal air quality impacts will result in the proposed project having minimal impact on endangered species potentially near the site.

#### Impact on Visibility (Regional Haze Analysis)

One component of the PSD regulations includes the protection of air quality and air quality related values (AQRV) at potentially affected nearby Class I areas. Assessment of the potential impact to visibility is required within 300 km of a Class I area. The nearest Class I areas to Caddo River are the Caney Creek Wilderness Area at about 40 km and the Upper Buffalo Wilderness area at about 160 km. Based on the Federal Land Managers Air Quality Related Values Work Group (FLAG) 2010 Report, Class I evaluations for visibility are not required for a facility if the Q/D ratio for the project is less than or equal to 10 (as long as the Class I area is beyond 50 km from the site). The Q in the Q/D equation is equal to 47.37 tpy and is based on the increase in all visibility affecting pollutants (NO<sub>x</sub>, SO<sub>2</sub>, PM, and H<sub>2</sub>SO<sub>4</sub>) calculated on the basis of maximum 24-hr emissions in tons/yr resulting from the project. The D in the equation is based on the distance (km) from the site to the Class I area. The following table shows that none of the Class I areas are above the screening value of 10.

Class I Area	Distance from Facility (km)	Q/D
Upper Buffalo Wilderness Area	164	0.3
Caney Creek Wilderness Area	42	1.2
Mingo Wilderness Area	417	0.2
Hercules-Glades Wilderness Area	263	0.2

The Q/D equation is not valid for sites within 50 km, which includes the Caney Creek Wilderness Area. Therefore, a Visibility analysis is required. EPA prescribes the use of its *Workbook for Plume Visual Impact Screening and Analysis* for conducting a visibility impairment analysis. EPA outlines three levels of screening procedures. If the criteria for the first, most conservative, screening level are met, no further analysis is required.

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The VISCREEN model is recommended for the first level (Level 1) screen. If predicted 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 matter emission increases associated with a modification.

#### Modeled Inputs

Emission rates entered into VISCREEN should reflect the maximum short-term rates expected during the course of a year. Therefore, the modeled emissions rates were based on the requested hourly emission rates for the project permitted sources (SN-04, SN-04A, SN-05, SN-18, and SN-19). The hourly rates for the insignificant activities (Fuel Shed, #3 Kiln Fuel Bin, and #4 Kiln Fuel Bin) were estimated assuming annual emissions divided by 8,760 hours per a year. Emissions of SO<sub>2</sub> are not required as input to VISCREEN and the emission rates of the three species (primary NO<sub>2</sub>, soot, and sulfate) are assumed as zero.

#### Level-1 Screening Results

The following section shows the summary results of the Visual Effects Screening (VISCREEN) analysis for the proposed project at Caddo River Lumber to demonstrate compliance with the Impact on Visibility (Regional Haze Analysis) required for PSD projects within 300 miles of a Class I area. The Caddo River Lumber project passes the Level-1 test with a plum  $\Delta E$  ranging between 0.047 and 0.362, or approximately 2.4% to 14.8% of the screening criteria of 2.00. The Level-1 test resulted in a maximum contrast of 0.004, which is approximately 8% of the criteria of 0.05. Since the visibility impacts are below the screening criteria, it is concluded that the project will have an insignificant effect on visibility in any Class I area. Therefore, no further analysis is required.

#### Best Available Control Technology (BACT) Analysis

Under PSD rules contained in 40 CFR §52.21(j), the facility must apply Best Available Control Technology (BACT) on each new or modified emissions unit for each pollutant that would emit in a significant net emissions increase. BACT is defined in 40 CFR §52.21(b)(12) as follows:

Best Available Control Technology means an emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under Act which would be emitted from any proposed major stationary source or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular emissions unit would make the imposition of an emissions standard infeasible, a design, equipment, work practice, operational standard, or combination thereof, may be prescribed instead to satisfy the requirement for



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the application of best available control technology. Such standard shall, to the degree possible, set forth the emissions reduction achievable by implementation of such design, equipment, work practice or operation, and shall provide for compliance by means which achieve equivalent results.

A BACT analysis has been provided for each new or modified emission unit for each pollutant exceeding an applicable Prevention of Significant Deterioration (PSD) Significant Emission Rate (SER), which is volatile organic compounds (VOC) for the proposed project.

### BACT Methodology

In a memorandum dated December 1, 1987, the EPA stated its preference for a “top-down” analysis. After determining if any New Source Performance Standards (NSPS) is 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, environmentally, or economically infeasible for the 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, environmental, or economical objections. Presented below are the five basic steps of a top-down BACT review as identified by the EPA.

#### Step 1 - Identify All Control Technologies

Available control technologies are identified for each emission unit in question. The following methods are used to identify potential technologies:

1. Researching the Reasonable Available Control Technology (RACT)/BACT/Lowest, Achievable Emission Rate (LAER) Clearinghouse (RBLC) database,
2. Surveying regulatory agencies,
3. Drawing from previous engineering experience,
4. Surveying air pollution control equipment vendors, and
5. Surveying available literature.

#### Step 2 - Eliminate Technically Infeasible Options

After the identification of control options, an analysis is conducted to eliminate technically infeasible options. A control option is eliminated from consideration if there are process-specific conditions that prohibit the implementation of the control technology or if the highest control efficiency of the option would result in an emission level that is higher than any applicable regulatory limits, such as NSPS.

#### Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Once technically infeasible options are removed from consideration, the remaining options are ranked based on their control effectiveness. If there is only one remaining option or if all of the

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remaining technologies offer equivalent control, ranking based on control efficiency is not required.

#### Step 4 - Evaluate Most Effective Controls and Document Results

Beginning with the most efficient control option in the ranking, detailed economic, energy, and environmental impact evaluations are performed. If a control option is determined to be economically feasible without adverse energy or environmental impacts, it is not necessary to evaluate the remaining options with lower control efficiencies.

The economic evaluation centers on the cost effectiveness of the control option. Cost of installing and operating control technologies are estimated and annualized following the methodologies outlined in EPA's OAQPS Control Cost Manual (CCM) and other industry resources.

#### Step 5 - Select BACT

In the final step, one pollutant-specific control option is proposed as BACT for each emission unit under review based on evaluations from the previous step.

The EPA has consistently interpreted the statutory and regulatory BACT definitions as containing two core requirements that the agency believes must be met by any BACT determinations, regardless of whether the "top-down" approach is used. First, the BACT analysis must include consideration of the most stringent available control technologies, i.e. those which provide the "maximum degree of emission reduction". Second, any decision to require a lesser degree of emission reduction must be justified by an objective analysis of "energy, environmental, and economic impacts".

The potential increase in VOC emissions resulting from the Caddo River LLC (Caddo River) project will exceed the PSD SER. Therefore, VOC emissions from the modified emitting sources (SN-04, SN-04A, SN-18, and SN-19) are subject to a BACT analysis. The other emission units associated with the project do not emit VOC.

BACT Volatile Organic Compound Emissions Analysis: DPK #3 (SN-04, SN-18) & DPK #4 (SN-04A, SN-19)

During the lumber drying process, organic compounds present in the wood will be released. These are organic compounds that are in gaseous form at the elevated temperature of the wood, and are comprised largely of lower molecular weight volatiles, higher molecular weight resin and fatty acids. The type and amounts of compounds released will depend on several factors related to the drying process, including the kiln temperature, the surface area of the wood material relative to its mass, initial moisture content, and the amount of moisture removed from the material. It also varies depending on the wood species. An abort stack for DPK #3 (SN-18) and DPK #4 (SN-19), is necessary during startup or for unplanned shutdown of the gasifier/burner.

Step 1: The first of the five steps in the top-down BACT analysis procedure is to identify control technologies for each pollutant. The EPA RACT/BACT/LAER Clearinghouse (RBLC) was searched for lumber drying kilns (process type 30.8) permitted after January 1, 2006. The search was further refined to address only VOC for this analysis. The search of lumber drying kilns was then narrowed to match units similar to Caddo River's kilns (i.e. direct fired kilns). The results of this search are included as RBLC results. The range of VOC limits based on throughput was between 2.49 lb/MBF and 4.7 lb/MBF. In cases where BACT was specified, it was determined to be proper maintenance & operations such as "work practice standards", "proper maintenance and operation", and "proper temperature and process management; drying to appropriate moisture content" with no additional/add-on control.

A search was also completed of VOC control technologies for other processes that may be applied to a dry lumber kiln. Based on the research described above and other engineering experience, control technologies evaluated are:

- Regenerative Thermal Oxidation
- Regenerative Catalytic Oxidation
- Carbon Adsorption
- Condensation
- Biofiltration
- Wet Scrubbing
- Proper Maintenance & Operation

Regenerative Thermal Oxidation: Regenerative Thermal Oxidizer (RTO) units use beds of ceramic pieces to recover and store heat. A VOC-laden air stream passes through a heated ceramic bed before entering a combustion chamber. In the combustion chamber, the VOC laden gas stream is heated by auxiliary fuel (natural gas) combustion to a final oxidation temperature typically between 1,400°F to 1,500°F and maintained at this temperature to achieve maximum VOC destruction. The exhaust gases from the combustion chamber are used to heat another ceramic bed. Periodically, the flow is reversed so the bed that was being heated is now used to preheat the VOC-laden gas stream. Usually, there are three or more beds that are continually cycled. Destruction efficiency of VOC depends upon the design criteria (i.e. chamber temperature, residence time, inlet VOC concentration, compound type, and degree of mixing). Typical VOC destructive efficiency ranges from 95 to 99% for RTO systems depending on system requirements and characteristics of the contaminated stream. Lower control efficiencies are generally associated with lower concentration flows.

Regenerative Catalytic Oxidation: Regenerative catalytic oxidizer (RCO) units function similar to RTOs, except that the heat recovery beds in RCOs contain catalytic media. The catalyst accelerates the rate of VOC oxidation and allows for VOC destruction at lower temperatures than in an RTO, typically 600°F to 1,000°F, which reduces auxiliary fuel usage. Typical VOC destructive efficiency ranges from 90 to 99% for RCO systems. However, this also depends on system requirements and characteristics of the contaminated stream.

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**Carbon Adsorption:** The core component of a carbon adsorption system is an activated carbon bed contained in a steel vessel. The VOC-laden gases pass through the carbon bed and the VOCs are adsorbed on the activated carbon. The cleaned gas is discharged to the atmosphere. The spent carbon is regenerated either with an onsite regeneration facility or by an off-site activated carbon supplier. Steam is used to replace adsorbed organic compounds at high temperatures to regenerate the spent carbon. At proper operating conditions, carbon adsorption systems have demonstrated VOC reduction efficiencies of approximately 90 to 95%.

**Condensation:** Condensation removes vaporous contaminants from the gas stream by cooling it and converting the vapor into a liquid. In some instances, control of VOC can be satisfactorily achieved entirely by condensation. However, most applications require additional control methods. In such cases, the use of a condensation process reduces the concentration load on downstream control equipment. The two most common type of condensation devices are contact or barometric condensers and surface condensers.

**Biofiltration:** Biofiltration is an 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.

**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. A VOC gas stream with relatively high water solubility is required in order for the wet scrubber to be effective.

**Proper Maintenance and Operation:** Proper maintenance and operation of lumber drying kilns can effectively reduce VOC emissions. Proper drying schedule and temperature should be selected based on moisture content and manufacturer's specifications. Routine maintenance should also be completed on all kilns based on manufacturer's recommendations.

**Step 2:** The second of the five steps in the top-down BACT analysis procedure is to eliminate technically infeasible control technologies. The table below provides a summary of the feasibility of the control technologies identified in Step 1.

Pollutant	Control Technology	Feasibility
VOC	Carbon Adsorption	Infeasible
	Regenerative Thermal Oxidation	Infeasible
	Regenerative Catalytic Oxidation	Infeasible
	Condensation	Infeasible
	Biofiltration	Infeasible
	Wet Scrubbing	Infeasible
	Proper Maintenance and Operation	Feasible

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The following sections provide brief explanations on the further infeasibility of the VOC control technologies for the kilns.

**Regenerative Thermal Oxidation:** Due to the high moisture content and low exit temperature in the exhaust stream, RTO would be technically infeasible for the kilns.

**Regenerative Catalytic Oxidation:** Although regenerative catalytic oxidizers can operate at a lower temperature than thermal oxidizers, the temperature of the exit stream from lumber drying kilns is still not high enough for optimal function of the catalytic oxidizer. Furthermore, loss of catalytic activity occurs due to fouling by particulate matter or suppression or poisoning from other contaminants in the waste gas stream. In order to effectively use catalytic oxidation, the contaminants must be removed from the waste gas stream. Removing these contaminants would require additional control equipment which adds greatly to the cost of the system. Catalysts must periodically be replaced due to thermal aging, adding significantly to the cost of operating the unit in addition to creating solid waste. Catalytic oxidation has never been applied to a lumber drying kiln. Regenerative catalytic oxidation is not considered feasible for the kilns.

**Carbon Adsorption:** Carbon adsorption is not practical because of the high moisture content of the exhaust stream from lumber drying kilns. At high moisture content, water molecules begin to compete with the hydrocarbon molecules for active adsorption sites. This reduces the capacity and the efficiency of the adsorption system. For the reason stated above and because there are currently no known lumber drying kilns that are equipped with carbon adsorption system, the use of carbon adsorption systems for the kilns is not considered technically feasible.

**Condensation:** Condensation is only effective when the gas steam can be cooled to a temperature where VOC constituent condenses as a liquid out of the gas stream. To condense terpenes, the primary constituent of lumber kiln VOC emissions, the temperature would need to be reduced to -40°F. At this temperature, freezing of the water vapor would generate ice, causing unacceptable plugging of the unit. Condensation is not technically feasible for the kilns.

**Biofiltration:** The most important variable affecting bioreactor operations is temperature. Most microorganisms can survive and flourish in a temperature range of 60 to 105°F (30 to 41°C). The exiting exhaust temperature of the lumber kilns are approximately 140 - 200°F. Furthermore, the VOC emissions from the kilns is primarily terpenes. Terpenes are highly viscous and would foul the biofilter. Biofiltration is not technically feasible for the kilns.

**Wet Scrubbing:** The VOC emissions from the kiln are primarily terpenes. Terpenes are not highly soluble. Moreover, they are highly viscous and would foul the absorption media of a wet scrubber. Wet scrubbing is not technically feasible for the kilns.

**Step 3:** The only control technology considered technically feasible and identified in the RBLC is proper maintenance and operation; ranking is not necessary.

**Step 4:** Proper maintenance and operation is the only remaining technology/method for this application. No control technology is currently feasible for lumber drying kilns beyond proper

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maintenance and operation. The RBLC search shows other emission factors utilized in permitting emission limits of VOC; there is no information to determine that these factors can be routinely “achieved in practice”.

Step 5: The fifth and final step in the top-down BACT analysis procedure is the selection of the BACT level of control for each pollutant. Per EPA guidance, BACT is the most effective control technology not eliminated by the previous four steps of the analysis. Proper maintenance and operation is the only remaining technology for the reduction of VOC emissions from DPK #3 (SN-04) and DPK #4 (SN-04A) and their respective abort stacks (SN-18 and SN-19). The species of wood dried within a kiln has a distinct impact on the resulting VOC emissions. The emission factor proposed for the VOC as C emission limits (3.8 lb/MBf) is accepted by the Arkansas Department of Environmental Quality (ADEQ) for permitting similarly designed direct fired continuous kilns drying similar wood species. Therefore Caddo River proposes it as BACT. Furthermore, startup and shutdown events will be minimized as much as practical.

### Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective March 14, 2016
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective March 14, 2016
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective March 14, 2016
40 C.F.R. § 52.21 - <i>Prevention of significant deterioration of air quality</i>
40 C.F.R. § 63, Subpart DDDD - <i>National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products</i>

Emission Summary

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
Total Allowable Emissions		PM	20.5	55.7
		PM <sub>10</sub>	10.8	19.5
		PM <sub>2.5</sub>	See Note*	
		SO <sub>2</sub>	2.4	8.1
		VOC	106.8	351.7
		CO	21.6	80.9
		NO <sub>x</sub>	12.2	26.5
		Lead	4.34E-03	1.53E-02
HAPs		Methanol**	5.04	16.65
NCAPs		Total chargeable NCAPs <sup>a</sup>	2.48	8.92
		Total other NCAPs <sup>a</sup>	8.70	28.03
01	Wood Waste Boiler (265.61 MMBtu/hr)	Sources removed in 2017.		
02	Dry Kiln #1			
03	Dry Kiln #2			
04	Dry Kiln #3	Source will be converted to a DPK		
04	DPK # 3 (36 MMBtu/hr wood fired gasifier)  14 MBF/hr maximum capacity	PM	2.0	-
		PM <sub>10</sub>	1.5	-
		SO <sub>2</sub>	0.9	-
		VOC	53.2	-
		CO	9.2	-
		NO <sub>x</sub>	4.0	-
		Lead	1.73E-03	-
		Methanol**	2.52	-
		Total chargeable NCAPs <sup>a</sup>	1.02	-
		Total other NCAPs <sup>a</sup>	3.61	-

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
04A	DPK # 4 (36 MMBtu/hr wood fired gasifier)  14 MBF/hr maximum capacity	PM	2.0	-
		PM <sub>10</sub>	1.5	-
		SO <sub>2</sub>	0.9	-
		VOC	53.2	-
		CO	9.2	-
		NO <sub>x</sub>	4.0	-
		Lead	1.73E-03	-
		Methanol**	2.52	-
		Total chargeable NCAPs <sup>a</sup>	1.02	-
Total other NCAPs <sup>a</sup>	3.61	-		
04 & 04A	Combined Kiln Annual Limits	PM	N/A	13.0
		PM <sub>10</sub>		9.7
		SO <sub>2</sub>		7.9
		CO		80.5
		NO <sub>x</sub>		25.9
		Lead		1.52E-02
		Methanol**		16.65
Total Chargeable NCAPs <sup>a</sup>	8.86			
Total other NCAPs <sup>a</sup>	27.85			
04, 04A, 18, & 19	Combined BACT annual limits for the Kilns and Abort Stacks	VOC	N/A	351.5
05	Planer Mill Shavings Bin Cyclone	PM	0.2	0.5
		PM <sub>10</sub>	0.2	0.5
05A	Planer Mill Shavings Bin Loadout	PM	0.1	0.2
		PM <sub>10</sub>	0.1	0.2
17	Haul Roads	PM	10.2	41.2
		PM <sub>10</sub>	2.1	8.3
18	DPK # 3 Abort Stack	PM	3.0	0.4
		PM <sub>10</sub>	2.7	0.4
		SO <sub>2</sub>	0.3	0.1
		VOC	0.2	0.1
		CO	1.6	0.2
		NO <sub>x</sub>	2.1	0.3
		Lead	4.4E-04	5.27E-05
		Total Chargeable NCAPs <sup>a</sup>	0.22	0.03
Total other NCAPs <sup>a</sup>	0.74	0.09		



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EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
19	DPK # 4 Abort Stack	PM	3.0	0.4
		PM <sub>10</sub>	2.7	0.4
		SO <sub>2</sub>	0.3	0.1
		VOC	0.2	0.1
		CO	1.6	0.2
		NO <sub>x</sub>	2.1	0.3
		Lead	4.4E-04	5.27E-05
		Total Chargeable NCAPs <sup>a</sup>	0.22	0.03
		Total other NCAPs <sup>a</sup>	0.74	0.09

\*PM<sub>2.5</sub> limits are source specific, if required. Not all sources have PM<sub>2.5</sub> limits.

\*\*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.

<sup>a</sup> Includes both HAPs and NCAPs.

### SECTION III: PERMIT HISTORY

The initial permit for the facility, Permit No. 189-A, was issued in June of 1986. This permit required the permittee to not exceed 1.0 pound of particulates per hour from the cyclone and 15.5 gallons of VOCs per hour in the coatings area.

Permit No. 189-AR-1, was issued to the facility in March of 1997, to incorporate emissions from unpermitted sources and new boiler emissions. The facility modifications were as follows:

- to replace the existing boiler with a Wellons wood-fired boiler (SN-01). The facility proposed to replace an existing wood-fired boiler with a new Wellons wood-fired boiler rated at 125,000 lb/hr. This boiler is equipped with an electric cogeneration capability;
- to increase the lumber processing rate in the planer mill;
- to increase the lumber processing rate in the drying kilns;
- to include the air pollutants emissions from the wood waste boiler (SN-01), emissions from the kilns (SN-02, SN-03, and SN-04), and the emissions from the other sources (SN-05, SN-05A, SN-06, SN-11, SN-12, and SN-14);
- to address its major source status, and to show it had not circumvented/not been subject to Prevention of Significant Deterioration (PSD) review in the past. The facility was determined to have been below 250 tpy for all pollutants prior to this modification. This modification increased the permitted VOC emission limit to greater than 250 tpy, which triggered PSD “major source” status for the facility at this time.

Permit No.189-AOP-R0 (issued on June 8, 1999) was the first Operating Permit issued to Bean Lumber Company, Inc. - Glenwood Plant under Regulation 26. The permit application included one new Dry Kiln (SN-04A) and changed the designations of the sawdust emission sources, adding a Sawdust Bin Loadout (SN-05A). The facility is classified under SIC code 2421. Total particulates were 136.1 tpy, lower than the previous permit limit because of revised emission factors. PM<sub>10</sub> emission rates were quantified for the first time at 84.1 tpy, using recent AP-42 factors. Total HAPs were less than 2 tpy, with speciated heavy metals included in the particulates at less than 1 tpy.

Permit No. 189-AOP-R1 was issued to Bean Lumber Company on December 14, 1999. This modification was issued in order to account for several changes since the issuance of permit 189-AOP-R0. These changes included an increase in the lumber throughput in the woodshop (SN-11) from 16.2 MM to 60 MM board feet of lumber per year, and the replacement of the 30,000 gallon above ground fuel storage tank (formerly SN-10) with a new, double compartment tank (SN-10). The new tank stores 10,000 gallons of diesel fuel for over the road use in one compartment, and 4,000 gallons of non tax fuel for use in fork lifts and off road equipment in the other compartment. The increase in woodshop throughput resulted in PM emissions increasing by 1.9 tpy. The emissions from the new tank were 0.2 tpy of VOC, which is below PSD significant levels. Additionally several administrative changes were made to the source description for SN-08, SN-09, and SN-10. Additionally, the throughput at Drying Kiln #4 (SN-04A) was limited to 25.8 million board feet per year in order to avoid PSD review. Emission

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limits in this permitting action were quantified at: 138.0 tpy of PM, 84.4 tpy of PM<sub>10</sub>, 8.0 tpy of SO<sub>2</sub>, 280.5 tpy of VOC, 231.0 tpy of CO, and 212.5 tpy of NO<sub>x</sub>.

Permit No. 189-AOP-R2 was issued to Bean Lumber Company on May 1, 2001. This modification was issued in order to allow for the inclusion of lower emission rates calculated from stack test data for the wood-waste boiler (SN-01), as well as to allow for changes in compliance mechanisms for various other permitted limits. Due to the new boiler emission limits, this permitting action resulted in a decrease in emissions from the boiler of: 75.4 tpy PM<sub>10</sub>, 84.1 tpy PM, 0.3 tpy SO<sub>2</sub>, and 70.7 tpy VOC. Additionally, the allowable throughput of the lumber drying kilns was increased in this modification to 148,258 thousand board feet (MBF) per year, which increases VOC emissions from the kilns by 28.0 tpy. This resulted in a net VOC emissions decrease of 42.7 tpy in this modification. As a result of the new, lower VOC emission limit, this facility was no longer considered a major source for the purposes of Prevention of Significant Deterioration (PSD) applicability.

Permit No. 189-AOP-R3 was issued to Bean Lumber Company on October 10, 2001. This modification was issued in order to allow for an expansion of the capacity of the Wellons wood-waste boiler. The capacity of the boiler was increased from 125,000 lb/hr of steam to 155,000 lb/hr steam. Additionally, a new curve saw was installed in the saw mill at this time. PM emissions from the boiler were recalculated based on the revised 0.1 lb/MMBtu NSPS limit found in 40 C.F.R. § 60 Subpart Db. Due to these changes, as well as changes to other published emission factors, emissions from the facility increased with this modification by: 104.8 tpy PM, 94.6 tpy PM<sub>10</sub>, 1.7 tpy SO<sub>2</sub>, 0.7 tpy VOC, 6.7 tpy CO, and 25.2 tpy NO<sub>x</sub>.

Permit No. 189-AOP-R4 was issued to Bean Lumber Company on May 10, 2005. This was the first renewal of the Title V Operating Air Permit for this facility. Changes to the facility permitted with this renewal and modification included an increase in the allowable lumber drying throughput from 148,258,000 board feet per year to 185,000,000 board feet per year and a change in the lumber treatment chemicals from CCA to Copper Azole. There were also changes to emission factors used to permit the wood-waste boiler (SN-01) and the drying kilns (SN-02 through SN-04A). As a result of the increase in dried lumber throughput, this facility was classified as a major source with respect to federal Prevention of Significant Deterioration (PSD) regulations. The changes with this modification resulted in the following emission increases: 18.9 tons per year (tpy) of SO<sub>2</sub>, 99.9 tpy of VOC, 24.51 tpy methanol, 3.51 tpy benzene, 5.71 tpy formaldehyde, 3.42 tpy acetone, as well as small increases in various other hazardous air pollutants (HAPs).

Permit No. 189-AOP-R5 was issued on June 13, 2016. The Title V permit was renewed with permit modifications. The permit ownership and name was changed from Bean Lumber Company, Inc. to Caddo River, LLC. Two natural gas-fired boilers (SN-15 and SN-16) were authorized for construction, the hours of operation for existing wood-fired boiler (SN-01) was increased to 8,760 hr/yr, haul road emissions were added, and the following sources were removed: SN-11, SN-12, and SN-14. Also, a requirement to submit an application at least six months before re-start of SN-01 and obtain a final permit was included as a condition of the Title V renewal, refer to Specific Condition #15 of Permit No. 189-AOP-R5.

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Overall, annual permitted emission limits increased by 6.7 tpy PM, 2.1 tpy SO<sub>2</sub>, 10.6 tpy VOC, 48 tpy CO, 45.4 tpy NO<sub>x</sub>, 22.1 tpy hydrogen chloride, 2.32 tpy methanol, 1.75 tpy total chargeable non-criteria air pollutants (NCAPs), and 17.11 tpy total other NCAPs. While the annual permitted emission limit decreased by PM<sub>10</sub> by 50.3 tpy.

Permit No. 189-AOP-R6 was issued on February 8, 2017. This significant modification was issued to Caddo in order to construct a continuous, direct-fired lumber drying kiln (SN-04A). This project was determined by the applicant to be major modification pursuant to *Prevention of Significant Deterioration*. Caddo also requested the recently permitted two natural gas-fired boilers (SN-15 and SN-16) be removed from the permit because the facility decided to forego the construction of those two units. Overall, permitted emissions decreased by 0.6 tpy PM/PM<sub>10</sub>, 4.4 tpy VOC, 14.4 tpy CO, and 3.9 tpy NO<sub>x</sub>. Permitted SO<sub>2</sub> and HAPs increased by 3.0 tpy and 10.27 tpy, respectively.

Permit No. 0189-AOP-R7 was issued on June 28, 2017. This administrative amendment was issued to Caddo to add a Chip Transfer cyclone to the Insignificant Activities List. Overall, there were no changes to the permitted emissions.

SECTION IV: SPECIFIC CONDITIONS

SN-04 and SN-04A  
 DPK # 3 and DPK # 4

Source Description

The green lumber is dried via one of the two DPKs, DPK #3 (SN-04) and DPK #4 (SN-04A). Each kiln is equipped with a 36 MMBtu/hr wood fired gasifier.

Specific Conditions

- The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with these BACT limits by compliance with Specific Conditions 2, 7, and 8. [Reg.19.901 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy*
04	DPK # 3 (36 MMBtu/hr wood fired gasifier)	VOC	53.2	351.5
04A	DPK # 4 (36 MMBtu/hr wood fired gasifier)	VOC	53.2	
18	DPK # 3 Abort Stack	VOC	0.2	
19	DPK # 4 Abort Stack	VOC	0.2	

\* Total annual limits for both kilns, and associated abort stacks, are bubbled together.

- The permittee shall comply with the following BACT determination for SN-04, SN-04A, SN-18, and SN-19. Compliance with the emission limits set forth in the following table shall be demonstrated through compliance with good combustion practices, proper kiln design, operation, and maintenance. [Reg.19.901 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	BACT Determination	BACT Limit
04	DPK # 3	Good Combustion Practices; and Proper Kiln Design, Operation, and Maintenance	3.8 lb VOC/MBF
04A	DPK # 4		
18	DPK # 3 Abort Stack	Good Combustion Practices	VOC: 0.017 lb/MMBtu (sawdust) 0.252 lb/1000 gal (diesel)
19	DPK # 4 Abort Stack		

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3. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 7 and 8. [Reg.19.501 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy*
04	DPK # 3 (36 MMBtu/hr wood fired gasifier)	PM <sub>10</sub>	1.5	9.7
		SO <sub>2</sub>	0.9	7.9
		CO	9.2	80.5
		NO <sub>x</sub>	4.0	25.9
		Lead	1.73E-03	1.52E-02
04A	DPK # 4 (36 MMBtu/hr wood fired gasifier)	PM <sub>10</sub>	1.5	-
		SO <sub>2</sub>	0.9	-
		CO	9.2	-
		NO <sub>x</sub>	4.0	-
		Lead	1.73E-03	-
18	DPK # 3 Abort Stack	PM <sub>10</sub>	2.7	0.4
		SO <sub>2</sub>	0.3	0.1
		CO	1.6	0.2
		NO <sub>x</sub>	2.1	0.3
		Lead	4.4E-04	5.3E-05
19	DPK # 4 Abort Stack	PM <sub>10</sub>	2.7	0.4
		SO <sub>2</sub>	0.3	0.1
		CO	1.6	0.2
		NO <sub>x</sub>	2.1	0.3
		Lead	4.4E-04	5.3E-05

\* Total annual limits for both kilns are bubbled together.

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4. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by Specific Conditions 7 and 8. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
04	DPK # 3 (36 MMBtu/hr wood fired gasifier)	PM	2.0	13.0*
		Methanol	2.52	16.65*
		Total Chargeable NCAPs <sup>a</sup>	1.02	8.86*
		Total other NCAPs <sup>a</sup>	3.61	27.85*
04A	DPK # 4 (36 MMBtu/hr wood fired gasifier)	PM	2..0	*
		Methanol	2.52	*
		Total Chargeable NCAPs <sup>a</sup>	1.02	*
		Total other NCAPs <sup>a</sup>	3.61	*
18	DPK # 3 Abort Stack	PM	3.0	0.4
		Total Chargeable NCAPs <sup>a</sup>	0.22	0.03
		Total other NCAPs <sup>a</sup>	0.74	0.09
19	DPK # 4 Abort Stack	PM	3.0	0.4
		Total Chargeable NCAPs <sup>a</sup>	0.22	0.03
		Total other NCAPs <sup>a</sup>	0.74	0.09

\* Total annual limits for both kilns are bubbled together.

<sup>a</sup> Includes both HAPs and NCAPs.

5. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
04	20%	Reg.19.503 and 40 C.F.R. § 52 Subpart E
04A		
18		
19		

6. Weekly observations of the opacity from SN-04 and SN-04A shall be conducted by a person trained but not necessarily certified in EPA Reference Method 9. During startup operations, the permittee shall conduct observations of the opacity from SN-18 and SN-19 by a person trained but not necessarily certified in EPA Reference Method 9. If visible emissions in excess of the permitted levels are detected, the permittee shall immediately take action to identify the cause of the visible emissions in excess of the permit limit, implement corrective action, and perform an EPA Reference Method 9 test to verify emissions are not in excess of the permitted level. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated monthly, kept on site, and made available to Department personnel upon request. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
  - a. The date and time of the observation.
  - b. If visible emissions which appeared to be above the permitted limit were detected.
  - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
  - d. The name of the person conducting the opacity observations.
7. The permittee shall not exceed a combined throughput of 185,000,000 board feet of lumber through the direct fired dual path kilns (SN-04 and SN-04A) per rolling 12-month period. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
8. The permittee shall not exceed the limits specified in the following table. [Reg.19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]

SN	Diesel fuel usage limit as starter fluid	Wood throughput limit for gasifier/burner during startup	Operating Hour Limits for each Abort Stack
18	1,200 gallons per rolling 12-months	2000 lb per hour	240 hours per rolling 12-months
19	1,200 gallons per rolling 12-months	2000 lb per hour	240 hours per rolling 12-months

9. The permittee shall maintain monthly records to demonstrate compliance with Specific Conditions 7 and 8. The permittee shall update these records by the 15<sup>th</sup> day of the month following the month to which the records pertain. The 12-month rolling totals and each individual month's data shall be maintained on-site, made available to Department personnel upon request, and submitted in accordance with General Provision 7. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
10. The permittee shall test SN-04 for PM and CO using EPA Reference Method 5 with EPA Reference Method 202 and EPA Reference Method 10, respectively. This test shall take



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place in accordance with Plantwide Condition 3. Testing shall be conducted with the source operating at least at 90% of its permitted capacity as listed in the following table. Emission testing results shall be extrapolated to correlate with 100% of the permitted capacity to demonstrate compliance. Failure to test within this range shall limit the permittee to operating within 10% above the tested rate. The permittee shall measure the operation rate during the test and if testing is conducted below 90% of the permitted capacity, records shall be maintained at all times to demonstrate that the source does not exceed operation at 10% above the tested rate. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Permitted Capacity of gasifier/burner	Permitted Capacity of DP Kiln
SN-04 (DPK#3)	8,000 lb of sawdust per hour	14,000 BF of lumber per hour

- The dry kilns (SN-04 and SN-04A) are all considered affected sources under 40 C.F.R. § 63, Subpart DDDD, *NESHAP for Plywood and Composite Wood Products*. Under 40 C.F.R. § 63, Subpart DDDD, the kilns at Caddo are not subject to the compliance options or work practice requirements specified in 40 C.F.R. § 63.2240. Caddo is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of 40 C.F.R. § 63, Subpart DDDD or any other requirements in 40 C.F.R. § 63, Subpart A for the kilns, except for the initial notification requirements of 40 C.F.R. § 63.9(b). [Reg.19.304 and 40 C.F.R. §§ 63.2231 and 63.2252]

SN-05 and SN-05A  
 Planer Mill Shavings Bin Cyclone/Baghouse and Loadout

Source Description

After the lumber is dried, it is placed in a cooling shed or outside. The lumber is then planed and trimmed in the planer mill. The shavings and dust from the planer mill are sent to the planer mill cyclone/baghouse (SN-05).

From the planer mill cyclone/baghouse (SN-05) shavings are sent to the planer mill shavings bin. From the planer mill shavings bin, the wood residue is loaded into trucks (SN-05A) and hauled offsite. SN-05A consists of non-point emissions from the bin loadout.

Specific Conditions

12. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 16 and 17. [Reg.19.501 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
05	Planer Mill Shavings Bin Cyclone/Baghouse	PM <sub>10</sub>	0.2	0.5
05A	Planer Mill Shavings Bin Loadout	PM <sub>10</sub>	0.1	0.2

13. The permittee shall not exceed the emission rates set forth in the following table. The permittee shall demonstrate compliance with this condition by compliance with Specific Conditions 16 and 17. [Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
05	Planer Mill Shavings Bin Cyclone/Baghouse	PM	0.2	0.5
05A	Planer Mill Shavings Bin Cyclone/Baghouse Loadout	PM	0.1	0.2

14. Visible emissions may not exceed the limits specified in the following table of this permit as measured by EPA Reference Method 9.

SN	Limit	Regulatory Citation
05	5%	Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311
05A	20%	Reg.19.503 and 40 C.F.R. § 52 Subpart E

15. Weekly observations of the opacity from SN-05 shall be conducted by a person trained but not necessarily certified in EPA Reference Method 9. If visible emissions in excess of the permitted levels are detected, the permittee shall immediately take action to identify the cause of the visible emissions in excess of the permit limit, implement corrective action, and perform an EPA Reference Method 9 test to verify emissions are not in excess of the permitted level. The permittee shall maintain records which contain the following items in order to demonstrate compliance with this specific condition. These records shall be updated monthly, kept on site, and made available to Department personnel upon request. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
  - a. The date and time of the observation.
  - b. If visible emissions which appeared to be above the permitted limit were detected.
  - c. If visible emissions which appeared to be above the permitted limit were detected, the cause of the exceedance of the opacity limit, the corrective action taken, and if the visible emissions appeared to be below the permitted limit after the corrective action was taken.
  - d. The name of the person conducting the opacity observations.
16. The permittee shall not exceed a throughput of 50,000 tons of wood residue (sawdust and shavings) loadout at SN-05A per rolling 12 month period. [Reg.19.705, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 70.6]
17. The permittee shall maintain monthly records to demonstrate compliance with Specific Condition 16. The permittee shall update these records by the 15<sup>th</sup> day of the month following the month to which the records pertain. The twelve month rolling totals and each individual month's data shall be maintained on-site, made available to Department personnel upon request, and submitted in accordance with General Provision 7. [Reg.19.705 and 40 C.F.R. § 52 Subpart E]
18. During the loading of wood residue generated from the Planer Mill Shavings Bin (SN-05A) onto trucks for offsite shipment, Caddo shall be limited to 20% opacity, to be determined by averaging all readings taken in accordance with USEPA Method 9, over a period of thirty-six consecutive minutes. If, at any time, Caddo exceeds the opacity limitation, the occurrence shall be reported to ADEQ in accordance with Regulation 18.

Caddo shall maintain a written log at the facility which documents each time material is loaded from the bin onto a truck. Each entry shall include the approximate weight of the material loaded, and the duration of the loading operation.

The activity shall be conducted in such a manner as to cause no nuisance to the surrounding community. ADEQ reserves the right to rescind this authority if, at any time, the emissions from the operations become a nuisance to the surrounding community. [Reg.18.501 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN-17  
Haul Roads

Source Description

Operations in this area include road traffic within the facility boundaries. Logs, lumber, chips, sawdust, shavings, dry trim, and fuel are all shipped into or out of the mill by truck or by rail. Haul roads are either covered in gravel or paved at the facility.

Specific Conditions

19. The permittee shall not exceed the emission rates set forth in the following table.  
[Reg.19.501 *et seq.* and 40 C.F.R. § 52 Subpart E]

SN	Description	Pollutant	lb/hr	tpy
17	Haul Roads	PM <sub>10</sub>	2.1	8.3

20. The permittee shall not exceed the emission rates set forth in the following table.  
[Reg.18.801 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

SN	Description	Pollutant	lb/hr	tpy
17	Haul Roads	PM	10.2	41.2

21. Nothing in this permit shall be construed to authorize a violation of the Arkansas Water and Air Pollution Control Act or the federal National Pollutant Discharge Elimination System (NPDES). [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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## SECTION V: COMPLIANCE PLAN AND SCHEDULE

Caddo River LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Reg.19.704, 40 C.F.R. § 52 Subpart E, and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Reg.19.410(B) and 40 C.F.R. § 52 Subpart E]
3. The permittee must test any equipment scheduled for testing, unless otherwise stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) business days in advance of such test. The permittee shall submit the compliance test results to the Department within sixty (60) calendar days after completing the testing. [Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
4. The permittee must provide:
  - a. Sampling ports adequate for applicable test methods;
  - b. Safe sampling platforms;
  - c. Safe access to sampling platforms; and
  - d. Utilities for sampling and testing equipment.

[Reg.19.702 and/or Reg.18.1002 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Reg.19.303 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
6. This permit subsumes and incorporates all previously issued air permits for this facility. [Reg. 26 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

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## SECTION VII: INSIGNIFICANT ACTIVITIES

The Department deems the following types of activities or emissions as insignificant on the basis of size, emission rate, production rate, or activity in accordance with Group A of the Insignificant Activities list found in Regulation 18 and Regulation 19 Appendix A. Group B insignificant activities may be listed but are not required to be listed in permits. Insignificant activity emission determinations rely upon the information submitted by the permittee in an application dated April 28, 2017 and September 27, 2017. [Reg.26.304 and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Description	Category
Chip Bin	A-13
Sawdust Bin	A-13
Bark Pile	A-13
Kiln Fuel Shed	A-13
Kiln # 3 Fuel Bin	A-13
Kiln # 4 Fuel Bin	A-13
Chip Conveyance	A-13
Bark Conveyance	A-13
Sawdust Conveyance	A-13
Shavings Conveyance	A-13

## SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 C.F.R. § 70.6(b)(2)]
2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 C.F.R. § 70.6(a)(2) and Reg.26.701(B)]
3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Reg.26.406]
4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 C.F.R. § 70.6(a)(1)(ii) and Reg.26.701(A)(2)]
5. The permittee must maintain the following records of monitoring information as required by this permit.
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses performed;
  - c. The company or entity performing the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.

[40 C.F.R. § 70.6(a)(3)(ii)(A) and Reg.26.701(C)(2)]



6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 C.F.R. § 70.6(a)(3)(ii)(B) and Reg.26.701(C)(2)(b)]
7. The permittee must submit reports of all required monitoring every six (6) months. If the permit establishes no other reporting period, the reporting period shall end on the last day of the month six months after the issuance of the initial Title V permit and every six months thereafter. The report is due on the first day of the second month after the end of the reporting period. The first report due after issuance of the initial Title V permit shall contain six months of data and each report thereafter shall contain 12 months of data. The report shall contain data for all monitoring requirements in effect during the reporting period. If a monitoring requirement is not in effect for the entire reporting period, only those months of data in which the monitoring requirement was in effect are required to be reported. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Reg.26.2 must certify all required reports. The permittee will send the reports to the address below:

Arkansas Department of Environmental Quality  
Office of Air Quality  
ATTN: Compliance Inspector Supervisor  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

[40 C.F.R. § 70.6(a)(3)(iii)(A) and Reg.26.701(C)(3)(a)]

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.
  - a. For all upset conditions (as defined in Reg.19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report may be made by telephone and shall include:
    - i. The facility name and location;
    - ii. The process unit or emission source deviating from the permit limit;
    - iii. The permit limit, including the identification of pollutants, from which deviation occurs;
    - iv. The date and time the deviation started;
    - v. The duration of the deviation;
    - vi. The emissions during the deviation;
    - vii. The probable cause of such deviations;
    - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future; and

ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

- b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Reg.19.601, Reg.19.602, Reg.26.701(C)(3)(b), and 40 C.F.R. § 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 C.F.R. § 70.6(a)(5), Reg.26.701(E), and Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]
10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. § 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 C.F.R. § 70.6(a)(6)(i) and Reg.26.701(F)(1)]
11. 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 to maintain compliance with the conditions of this permit. [40 C.F.R. § 70.6(a)(6)(ii) and Reg.26.701(F)(2)]
12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 C.F.R. § 70.6(a)(6)(iii) and Reg.26.701(F)(3)]
13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 C.F.R. § 70.6(a)(6)(iv) and Reg.26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director along with a claim of confidentiality. [40 C.F.R. § 70.6(a)(6)(v) and Reg.26.701(F)(5)]
15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 C.F.R. § 70.6(a)(7) and Reg.26.701(G)]
16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 C.F.R. § 70.6(a)(8) and Reg.26.701(H)]
17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 C.F.R. § 70.6(a)(9)(i) and Reg.26.701(I)(1)]
18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 C.F.R. § 70.6(b) and Reg.26.702(A) and (B)]
19. Any document (including reports) required by this permit pursuant to 40 C.F.R. § 70 must contain a certification by a responsible official as defined in Reg.26.2. [40 C.F.R. § 70.6(c)(1) and Reg.26.703(A)]
20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 C.F.R. § 70.6(c)(2) and Reg.26.703(B)]
  - a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records required under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually. If the permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due on the first day of the second month after the end of the reporting period. The permittee must also submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 C.F.R. § 70.6(c)(5) and Reg.26.703(E)(3)]
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The compliance status;
  - c. Whether compliance was continuous or intermittent;
  - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
  - e. Such other facts as the Department may require elsewhere in this permit or by § 114(a)(3) and § 504(b) of the Act.
  
22. Nothing in this permit will alter or affect the following: [Reg.26.704(C)]
  - a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
  - b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program, consistent with § 408(a) of the Act; or
  - d. The ability of EPA to obtain information from a source pursuant to § 114 of the Act.
  
23. This permit authorizes only those pollutant emitting activities addressed in this permit. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

24. The permittee may request in writing and at least 15 days in advance of the deadline, an extension to any testing, compliance or other dates in this permit. No such extensions are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion in the following circumstances:
- a. Such an extension does not violate a federal requirement;
  - b. The permittee demonstrates the need for the extension; and
  - c. The permittee documents that all reasonable measures have been taken to meet the current deadline and documents reasons it cannot be met.

[Reg.18.314(A), Reg.19.416(A), Reg.26.1013(A), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

25. The permittee may request in writing and at least 30 days in advance, temporary emissions and/or testing that would otherwise exceed an emission rate, throughput requirement, or other limit in this permit. No such activities are authorized until the permittee receives written Department approval. Any such emissions shall be included in the facility's total emissions and reported as such. The Department may grant such a request, at its discretion under the following conditions:
- a. Such a request does not violate a federal requirement;
  - b. Such a request is temporary in nature;
  - c. Such a request will not result in a condition of air pollution;
  - d. The request contains such information necessary for the Department to evaluate the request, including but not limited to, quantification of such emissions and the date/time such emission will occur;
  - e. Such a request will result in increased emissions less than five tons of any individual criteria pollutant, one ton of any single HAP and 2.5 tons of total HAPs; and
  - f. The permittee maintains records of the dates and results of such temporary emissions/testing.

[Reg.18.314(B), Reg.19.416(B), Reg.26.1013(B), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

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26. The permittee may request in writing and at least 30 days in advance, an alternative to the specified monitoring in this permit. No such alternatives are authorized until the permittee receives written Department approval. The Department may grant such a request, at its discretion under the following conditions:
- a. The request does not violate a federal requirement;
  - b. The request provides an equivalent or greater degree of actual monitoring to the current requirements; and
  - c. Any such request, if approved, is incorporated in the next permit modification application by the permittee.

[Reg.18.314(C), Reg.19.416(C), Reg.26.1013(C), Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]

27. Any credible evidence based on sampling, monitoring, and reporting may be used to determine violations of applicable emission limitations. [Reg.18.1001, Reg.19.701, Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311, and 40 C.F.R. § 52 Subpart E]
28. Unless specifically stated otherwise, emission rates and limits apply at all times of operation, including startup and shutdown. [Ark. Code Ann. § 8-4-203 as referenced by Ark. Code Ann. §§ 8-4-304 and 8-4-311]

Appendix A

ADEQ CEMS Conditions

# Arkansas Department of Environmental Quality



## CONTINUOUS EMISSION MONITORING SYSTEMS CONDITIONS

Revised September 2013



## PREAMBLE

These conditions are intended to outline the requirements for facilities required to operate Continuous Emission Monitoring Systems/Continuous Opacity Monitoring Systems (CEMS/COMS). Generally there are three types of sources required to operate CEMS/COMS:

1. CEMS/COMS required by 40 CFR Part 60 or 63,
2. CEMS required by 40 CFR Part 75,
3. CEMS/COMS required by ADEQ permit for reasons other than Part 60, 63 or 75.

These CEMS/COMS conditions are not intended to supercede Part 60, 63 or 75 requirements.

- Only CEMS/COMS in the third category (those required by ADEQ permit for reasons other than Part 60, 63, or 75) shall comply with SECTION II, MONITORING REQUIREMENTS and SECTION IV, QUALITY ASSURANCE/QUALITY CONTROL.
- All CEMS/COMS shall comply with Section III, NOTIFICATION AND RECORDKEEPING.

## SECTION I

### DEFINITIONS

**Continuous Emission Monitoring System (CEMS)** - The total equipment required for the determination of a gas concentration and/or emission rate so as to include sampling, analysis and recording of emission data.

**Continuous Opacity Monitoring System (COMS)** - The total equipment required for the determination of opacity as to include sampling, analysis and recording of emission data.

**Calibration Drift (CD)** - The difference in the CEMS output reading from the established reference value after a stated period of operation during which no unscheduled maintenance, repair, or adjustments took place.

**Back-up CEMS (Secondary CEMS)** - A CEMS with the ability to sample, analyze and record stack pollutant to determine gas concentration and/or emission rate. This CEMS is to serve as a back-up to the primary CEMS to minimize monitor downtime.

**Excess Emissions** - Any period in which the emissions exceed the permit limits.

**Monitor Downtime** - Any period during which the CEMS/COMS is unable to sample, analyze and record a minimum of four evenly spaced data points over an hour, except during one daily zero-span check during which two data points per hour are sufficient.

**Out-of-Control Period** - Begins with the time corresponding to the completion of the fifth, consecutive, daily CD check with a CD in excess of two times the allowable limit, or the time corresponding to the completion of the daily CD check preceding the daily CD check that results in a CD in excess of four times the allowable limit and the time corresponding to the completion of the sampling for the Relative Accuracy Test Audit (RATA), Relative Accuracy Audit (RAA), or Cylinder Gas Audit (CGA) which exceeds the limits outlined in Section IV. Out-of-Control Period ends with the time corresponding to the completion of the CD check following corrective action with the results being within the allowable CD limit or the completion of the sampling of the subsequent successful RATA, RAA, or CGA.

**Primary CEMS** - The main reporting CEMS with the ability to sample, analyze, and record stack pollutant to determine gas concentration and/or emission rate.

**Relative Accuracy (RA)** - The absolute mean difference between the gas concentration or emission rate determined by the CEMS and the value determined by the reference method plus the 2.5 percent error confidence coefficient of a series of tests divided by the mean of the reference method tests of the applicable emission limit.

**Span Value** – The upper limit of a gas concentration measurement range.

## SECTION II

### MONITORING REQUIREMENTS

\*\* Only CEMS/COMS required by ADEQ permit for reasons other than Part 60, 63 or 75 shall comply with this section.

- A. For new sources, the installation date for the CEMS/COMS shall be no later than thirty (30) days from the date of start-up of the source.
- B. For existing sources, the installation date for the CEMS/COMS shall be no later than sixty (60) days from the issuance of the permit unless the permit requires a specific date.
- C. Within sixty (60) days of installation of a CEMS/COMS, a performance specification test (PST) must be completed. PST's are defined in 40 CFR, Part 60, Appendix B, PS 1-9. The Department may accept alternate PST's for pollutants not covered by Appendix B on a case-by-case basis. Alternate PST's shall be approved, in writing, by the ADEQ CEM Coordinator prior to testing.
- D. Each CEMS/COMS shall have, as a minimum, a daily zero-span check. The zero-span shall be adjusted whenever the 24-hour zero or 24-hour span drift exceeds two times the limits in the applicable performance specification in 40 CFR, Part 60, Appendix B. Before any adjustments are made to either the zero or span drifts measured at the 24-hour interval, the excess zero and span drifts measured must be quantified and recorded.
- E. All CEMS/COMS shall be in continuous operation and shall meet minimum frequency of operation requirements of 95% up-time for each quarter for each pollutant measured. Percent of monitor down-time is calculated by dividing the total minutes the monitor is not in operation by the total time in the calendar quarter and multiplying by one hundred. Failure to maintain operation time shall constitute a violation of the CEMS conditions.
- F. Percent of excess emissions are calculated by dividing the total minutes of excess emissions by the total time the source operated and multiplying by one hundred. Failure to maintain compliance may constitute a violation of the CEMS conditions.
- G. All CEMS measuring emissions shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive fifteen minute period unless more cycles are required by the permit. For each CEMS, one-hour averages shall be computed from four or more data points equally spaced over each one hour period unless more data points are required by the permit.
- H. All COMS shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.
- I. When the pollutant from a single affected facility is released through more than one point, a CEMS/COMS shall be installed on each point unless installation of fewer systems is approved, in writing, by the ADEQ

CEM Coordinator. When more than one CEM/COM is used to monitor emissions from one affected facility the owner or operator shall report the results as required from each CEMS/COMS.

### SECTION III

#### **NOTIFICATION AND RECORD KEEPING**

\*\* All CEMS/COMS shall comply with this section.

- A. When requested to do so by an owner or operator, the ADEQ CEM Coordinator will review plans for installation or modification for the purpose of providing technical advice to the owner or operator.
- B. Each facility which operates a CEMS/COMS shall notify the ADEQ CEM Coordinator of the date for which the demonstration of the CEMS/COMS performance will commence (i.e. PST, RATA, RAA, CGA). Notification shall be received in writing no less than 15 business days prior to testing. Performance test results shall be submitted to the Department within thirty days after completion of testing.
- C. Each facility which operates a CEMS/COMS shall maintain records of the occurrence and duration of start up/shut down, cleaning/soot blowing, process problems, fuel problems, or other malfunction in the operation of the affected facility which causes excess emissions. This includes any malfunction of the air pollution control equipment or any period during which a continuous monitoring device/system is inoperative.
- D. Each facility required to install a CEMS/COMS shall submit an excess emission and monitoring system performance report to the Department (Attention: Air Division, CEM Coordinator) at least quarterly, unless more frequent submittals are warranted to assess the compliance status of the facility. Quarterly reports shall be postmarked no later than the 30th day of the month following the end of each calendar quarter.
- E. All excess emissions shall be reported in terms of the applicable standard. Each report shall be submitted on ADEQ Quarterly Excess Emission Report Forms. Alternate forms may be used with prior written approval from the Department.
- F. Each facility which operates a CEMS/COMS must maintain on site a file of CEMS/COMS data including all raw data, corrected and adjusted, repair logs, calibration checks, adjustments, and test audits. This file must be retained for a period of at least five years, and is required to be maintained in such a condition that it can easily be audited by an inspector.
- G. Quarterly reports shall be used by the Department to determine compliance with the permit.

## SECTION IV

### QUALITY ASSURANCE/QUALITY CONTROL

\*\* Only CEMS/COMS required by ADEQ permit for reasons other than Part 60, 63 or 75 shall comply with this section.

- A. For each CEMS/COMS a Quality Assurance/Quality Control (QA/QC) plan shall be submitted to the Department (Attn.: Air Division, CEM Coordinator). CEMS quality assurance procedures are defined in 40 CFR, Part 60, Appendix F. This plan shall be submitted within 180 days of the CEMS/COMS installation. A QA/QC plan shall consist of procedure and practices which assures acceptable level of monitor data accuracy, precision, representativeness, and availability.
- B. The submitted QA/QC plan for each CEMS/COMS shall not be considered as accepted until the facility receives a written notification of acceptance from the Department.
- C. Facilities responsible for one, or more, CEMS/COMS used for compliance monitoring shall meet these minimum requirements and are encouraged to develop and implement a more extensive QA/QC program, or to continue such programs where they already exist. Each QA/QC program must include written procedures which should describe in detail, complete, step-by-step procedures and operations for each of the following activities:
  - 1. Calibration of CEMS/COMS
    - a. Daily calibrations (including the approximate time(s) that the daily zero and span drifts will be checked and the time required to perform these checks and return to stable operation)
  - 2. Calibration drift determination and adjustment of CEMS/COMS
    - a. Out-of-control period determination
    - b. Steps of corrective action
  - 3. Preventive maintenance of CEMS/COMS
    - a. CEMS/COMS information
      - 1) Manufacture
      - 2) Model number
      - 3) Serial number
    - b. Scheduled activities (check list)
    - c. Spare part inventory
  - 4. Data recording, calculations, and reporting
  - 5. Accuracy audit procedures including sampling and analysis methods
  - 6. Program of corrective action for malfunctioning CEMS/COMS
- D. A Relative Accuracy Test Audit (RATA), shall be conducted at least once every four calendar quarters. A Relative Accuracy Audit (RAA), or a Cylinder Gas Audit (CGA), may be conducted in the other three

quarters but in no more than three quarters in succession. The RATA should be conducted in accordance with the applicable test procedure in 40 CFR Part 60 Appendix A and calculated in accordance with the applicable performance specification in 40 CFR Part 60 Appendix B. CGA's and RAA's should be conducted and the data calculated in accordance with the procedures outlined on 40 CFR Part 60 Appendix F.

If alternative testing procedures or methods of calculation are to be used in the RATA, RAA or CGA audits prior authorization must be obtained from the ADEQ CEM Coordinator.

E. Criteria for excessive audit inaccuracy.

**RATA**

All Pollutants except Carbon Monoxide	> 20% Relative Accuracy
Carbon Monoxide	> 10% Relative Accuracy
All Pollutants except Carbon Monoxide	> 10% of the Applicable Standard
Carbon Monoxide	> 5% of the Applicable Standard
Diluent (O <sub>2</sub> & CO <sub>2</sub> )	> 1.0 % O <sub>2</sub> or CO <sub>2</sub>
Flow	> 20% Relative Accuracy

**CGA**

Pollutant	> 15% of average audit value or 5 ppm difference
Diluent (O <sub>2</sub> & CO <sub>2</sub> )	> 15% of average audit value or 5 ppm difference

**RAA**

Pollutant	> 15% of the three run average or > 7.5 % of the applicable standard
Diluent (O <sub>2</sub> & CO <sub>2</sub> )	> 15% of the three run average or > 7.5 % of the applicable standard

- F. If either the zero or span drift results exceed two times the applicable drift specification in 40 CFR, Part 60, Appendix B for five consecutive, daily periods, the CEMS is out-of-control. If either the zero or span drift results exceed four times the applicable drift specification in Appendix B during a calibration drift check, the CEMS is out-of-control. If the CEMS exceeds the audit inaccuracies listed above, the CEMS is out-of-control. If a CEMS is out-of-control, the data from that out-of-control period is not counted towards meeting the minimum data availability as required and described in the applicable subpart. The end of the out-of-control period is the time corresponding to the completion of the successful daily zero or span drift or completion of the successful CGA, RAA or RATA.
- G. A back-up monitor may be placed on an emission source to minimize monitor downtime. This back-up CEMS is subject to the same QA/QC procedure and practices as the primary CEMS. The back-up CEMS shall be certified by a PST. Daily zero-span checks must be performed and recorded in accordance with standard practices. When the primary CEMS goes down, the back-up CEMS may then be engaged to sample, analyze and record the emission source pollutant until repairs are made and the primary unit is placed back in service. Records must be maintained on site when the back-up CEMS is placed in service, these records shall include at a minimum the reason the primary CEMS is out of service, the date and time the primary CEMS was out of service and the date and time the primary CEMS was placed back in service.



Appendix B

40 C.F.R. § 63, Subpart DDDD - *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*

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## **Subpart DDDD—National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products**

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## **WHAT THIS SUBPART COVERS**

SOURCE: 69 FR 46011, July 30, 2004, unless otherwise noted.

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### **§63.2230 What is the purpose of this subpart?**

This subpart establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements.

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### **§63.2231 Does this subpart apply to me?**

This subpart applies to you if you meet the criteria in paragraphs (a) and (b) of this section.

(a) You own or operate a PCWP manufacturing facility. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles,

strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(b) The PCWP manufacturing facility is located at a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

[69 FR 46011, July 30, 2004, as amended at 72 FR 61062, Oct. 29, 2007]

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### **§63.2232 What parts of my plant does this subpart cover?**

(a) This subpart applies to each new, reconstructed, or existing affected source at a PCWP manufacturing facility.

(b) The affected source is the collection of dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing of plywood and composite wood products. The affected source includes, but is not limited to, green end operations, refining, drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), resin preparation, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)). The affected source also includes onsite storage and preparation of raw materials used in the manufacture of plywood and/or composite wood products, such as resins; onsite wastewater treatment operations specifically associated with plywood and composite wood products manufacturing; and miscellaneous coating operations (§63.2292). The affected source includes lumber kilns at PCWP manufacturing facilities and at any other kind of facility.

(c) An affected source is a new affected source if you commenced construction of the affected source after January 9, 2003, and you meet the applicability criteria at the time you commenced construction.

(d) An affected source is reconstructed if you meet the criteria as defined in §63.2.

(e) An affected source is existing if it is not new or reconstructed.

[69 FR 46011, July 30, 2004, as amended at 71 FR 8371, Feb. 16, 2006]

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### **§63.2233 When do I have to comply with this subpart?**

(a) If you have a new or reconstructed affected source, you must comply with this subpart according to paragraph (a)(1) or (2) of this section, whichever is applicable.

(1) If the initial startup of your affected source is before September 28, 2004, then you must comply with the compliance options, operating requirements, and work practice requirements for new and reconstructed sources in this subpart no later than September 28, 2004.

(2) If the initial startup of your affected source is after September 28, 2004, then you must comply with the compliance options, operating requirements, and work practice requirements for new and reconstructed sources in this subpart upon initial startup of your affected source.

(b) If you have an existing affected source, you must comply with the compliance options, operating requirements, and work practice requirements for existing sources no later than October 1, 2007.

(c) If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, you must be in compliance with this subpart by October 1, 2007 or upon initial startup of your affected source as a major source, whichever is later.

(d) You must meet the notification requirements according to the schedule in §63.2280 and according to 40 CFR part 63, subpart A. Some of the notifications must be submitted before you are required to comply with the compliance options, operating requirements, and work practice requirements in this subpart.

[69 FR 46011, July 30, 2004, as amended at 71 FR 8372, Feb. 16, 2006; 72 FR 61062, Oct. 29, 2007]

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## COMPLIANCE OPTIONS, OPERATING REQUIREMENTS, AND WORK PRACTICE REQUIREMENTS

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### **§63.2240 What are the compliance options and operating requirements and how must I meet them?**

You must meet the compliance options and operating requirements described in Tables 1A, 1B, and 2 to this subpart and in paragraph (c) of this section by using one or more of the compliance options listed in paragraphs (a), (b), and (c) of this section. The process units subject to the compliance options are listed in Tables 1A and 1B to this subpart and are defined in §63.2292. You need only to meet one of the compliance options outlined in paragraphs (a) through (c) of this section for each process unit. You cannot combine compliance options in paragraph (a), (b), or (c) for a single process unit. (For example, you cannot use a production-based compliance option in paragraph (a) for one vent of a veneer dryer and an add-on control system compliance option in paragraph (b) for another vent on the same veneer dryer. You must use either the production-based compliance option or an add-on control system compliance option for the entire dryer.)

(a) *Production-based compliance options.* You must meet the production-based total HAP compliance options in Table 1A to this subpart and the applicable operating requirements in Table 2 to this subpart. You may not use an add-on control system or wet control device to meet the production-based compliance options.

(b) *Compliance options for add-on control systems.* You must use an emissions control system and demonstrate that the resulting emissions meet the compliance options and operating requirements in Tables 1B and 2 to this subpart. If you own or operate a reconstituted wood product press at a new or existing affected source or a reconstituted wood product board cooler at a new affected source, and you

choose to comply with one of the concentration-based compliance options for a control system outlet (presented as option numbers 2, 4, and 6 in Table 1B to this subpart), you must have a capture device that either meets the definition of wood products enclosure in §63.2292 or achieves a capture efficiency of greater than or equal to 95 percent.

(c) *Emissions averaging compliance option (for existing sources only)*. Using the procedures in paragraphs (c)(1) through (3) of this section, you must demonstrate that emissions included in the emissions average meet the compliance options and operating requirements. New sources may not use emissions averaging to comply with this subpart.

(1) *Calculation of required and actual mass removal*. Limit emissions of total HAP, as defined in §63.2292, to include acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde from your affected source to the standard specified by Equations 1, 2, and 3 of this section.

$$RMR = 0.90 \times \left( \sum_{i=1}^n UCEP_i \times OH_i \right) \quad (Eq. 1)$$

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$$AMR = \left( \sum_{i=1}^n CD_i \times OCEP_i \times OH_i \right) \quad (Eq. 2)$$

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$$AMR \geq RMR \quad (Eq. 3)$$

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Where:

RMR = required mass removal of total HAP from all process units generating debits (*i.e.*, all process units that are subject to the compliance options in Tables 1A and 1B to this subpart and that are either uncontrolled or under-controlled), pounds per semiannual period;

AMR = actual mass removal of total HAP from all process units generating credits (*i.e.*, all process units that are controlled as part of the Emissions Averaging Plan including credits from debit-generating process units that are under-controlled), pounds per semiannual period;

UCEP<sub>i</sub> = mass of total HAP from an uncontrolled or under-controlled process unit (i) that generates debits, pounds per hour;

OH<sub>i</sub> = number of hours a process unit (i) is operated during the semiannual period, hours per 6-month period;

CD<sub>i</sub> = control system efficiency for the emission point (i) for total HAP, expressed as a fraction, and not to exceed 90 percent, unitless (Note: To calculate the control system efficiency of biological treatment units that do not meet the definition of biofilter in §63.2292, you must use 40 CFR part 63, appendix C, Determination of the Fraction Biodegraded (F<sub>bio</sub>) in a Biological Treatment Unit.);

OCEP<sub>i</sub> = mass of total HAP from a process unit (i) that generates credits (including credits from debit-generating process units that are under-controlled), pounds per hour;

0.90 = required control system efficiency of 90 percent multiplied, unitless.

(2) *Requirements for debits and credits.* You must calculate debits and credits as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i) You must limit process units in the emissions average to those process units located at the existing affected source as defined in §63.2292.

(ii) You cannot use nonoperating process units to generate emissions averaging credits. You cannot use process units that are shut down to generate emissions averaging debits or credits.

(iii) You may not include in your emissions average process units controlled to comply with a State, Tribal, or Federal rule other than this subpart.

(iv) You must use actual measurements of total HAP emissions from process units to calculate your required mass removal (RMR) and actual mass removal (AMR). The total HAP measurements must be obtained according to §63.2262(b) through (d), (g), and (h), using the methods specified in Table 4 to this subpart.

(v) Your initial demonstration that the credit-generating process units will be capable of generating enough credits to offset the debits from the debit-generating process units must be made under representative operating conditions. After the compliance date, you must use actual operating data for all debit and credit calculations.

(vi) Do not include emissions from the following time periods in your emissions averaging calculations:

(A) Emissions during periods of startup, shutdown, and malfunction as described in the startup, shutdown, and malfunction plan (SSMP).

(B) Emissions during periods of monitoring malfunctions, associated repairs, and required quality assurance or control activities or during periods of control device maintenance covered in your routine control device maintenance exemption. No credits may be assigned to credit-generating process units, and maximum debits must be assigned to debit-generating process units during these periods.

(3) *Operating requirements.* You must meet the operating requirements in Table 2 to this subpart for each process unit or control device used in calculation of emissions averaging credits.

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#### **§63.2241 What are the work practice requirements and how must I meet them?**

(a) You must meet each work practice requirement in Table 3 to this subpart that applies to you.

(b) As provided in §63.6(g), we, the EPA, may choose to grant you permission to use an alternative to the work practice requirements in this section.

(c) If you have a dry rotary dryer, you may choose to designate your dry rotary dryer as a green rotary dryer and meet the more stringent compliance options and operating requirements in §63.2240 for green rotary dryers instead of the work practices for dry rotary dryers. If you have a hardwood veneer dryer or veneer redryer, you may choose to designate your hardwood veneer dryer or veneer redryer as a softwood veneer dryer and meet the more stringent compliance options and operating requirements in §63.2240 for softwood veneer dryer heated zones instead of the work practices for hardwood veneer dryers or veneer redryers.

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## GENERAL COMPLIANCE REQUIREMENTS

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### §63.2250 What are the general requirements?

(a) You must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

(b) You must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

(c) You must develop a written SSMP according to the provisions in §63.6(e)(3).

(d) Shutoff of direct-fired burners resulting from partial and full production stoppages of direct-fired softwood veneer dryers or over-temperature events shall be deemed shutdowns and not malfunctions. Lighting or re-lighting any one or all gas burners in direct-fired softwood veneer dryers shall be deemed startups and not malfunctions.

[69 FR 46011, July 30, 2004, as amended at 71 FR 8372, Feb. 16, 2006; 71 FR 20463, Apr. 20, 2006]

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### §63.2251 What are the requirements for the routine control device maintenance exemption?

(a) You may request a routine control device maintenance exemption from the EPA Administrator for routine maintenance events such as control device bakeouts, washouts, media replacement, and replacement of corroded parts. Your request must justify the need for the routine maintenance on the control device and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how you plan to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the EPA Administrator.

(b) The routine control device maintenance exemption must not exceed the percentages of process unit operating uptime in paragraphs (b)(1) and (2) of this section.

(1) If the control device is used to control a green rotary dryer, tube dryer, rotary strand dryer, or pressurized refiner, then the routine control device maintenance exemption must not exceed 3 percent of annual operating uptime for each process unit controlled.

(2) If the control device is used to control a softwood veneer dryer, reconstituted wood product press, reconstituted wood product board cooler, hardboard oven, press predryer, conveyor strand dryer,



or fiberboard mat dryer, then the routine control device maintenance exemption must not exceed 0.5 percent of annual operating uptime for each process unit controlled.

(3) If the control device is used to control a combination of equipment listed in both paragraphs (b)(1) and (2) of this section, such as a tube dryer and a reconstituted wood product press, then the routine control device maintenance exemption must not exceed 3 percent of annual operating uptime for each process unit controlled.

(c) The request for the routine control device maintenance exemption, if approved by the EPA Administrator, must be IBR in and attached to the affected source's title V permit.

(d) The compliance options and operating requirements do not apply during times when control device maintenance covered under your approved routine control device maintenance exemption is performed. You must minimize emissions to the greatest extent possible during these routine control device maintenance periods.

(e) To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is also shut down.

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### **§63.2252 What are the requirements for process units that have no control or work practice requirements?**

For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b).

[71 FR 8372, Feb. 16, 2006]

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## **INITIAL COMPLIANCE REQUIREMENTS**

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### **§63.2260 How do I demonstrate initial compliance with the compliance options, operating requirements, and work practice requirements?**

(a) To demonstrate initial compliance with the compliance options and operating requirements, you must conduct performance tests and establish each site-specific operating requirement in Table 2 to this subpart according to the requirements in §63.2262 and Table 4 to this subpart. Combustion units that accept process exhausts into the flame zone are exempt from the initial performance testing and operating requirements for thermal oxidizers.

(b) You must demonstrate initial compliance with each compliance option, operating requirement, and work practice requirement that applies to you according to Tables 5 and 6 to this subpart and according to §§63.2260 through 63.2269 of this subpart.

(c) You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in §63.2280(d).

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#### **§63.2261 By what date must I conduct performance tests or other initial compliance demonstrations?**

(a) You must conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date that is specified for your source in §63.2233 and according to §63.7(a)(2), whichever is later.

(b) You must conduct initial compliance demonstrations that do not require performance tests upon initial startup or no later than 30 calendar days after the compliance date that is specified for your source in §63.2233, whichever is later.

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#### **§63.2262 How do I conduct performance tests and establish operating requirements?**

(a) You must conduct each performance test according to the requirements in §63.7(e)(1), the requirements in paragraphs (b) through (o) of this section, and according to the methods specified in Table 4 to this subpart.

(b) *Periods when performance tests must be conducted.* (1) You must not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §63.7(e)(1).

(2) You must test under representative operating conditions as defined in §63.2292. You must describe representative operating conditions in your performance test report for the process and control systems and explain why they are representative.

(c) *Number of test runs.* You must conduct three separate test runs for each performance test required in this section as specified in §63.7(e)(3). Each test run must last at least 1 hour except for: testing of a temporary total enclosure (TTE) conducted using Methods 204A through 204F of 40 CFR part 51, appendix M, which require three separate test runs of at least 3 hours each; and testing of an enclosure conducted using the alternative tracer gas method in appendix A to this subpart, which requires a minimum of three separate runs of at least 20 minutes each.

(d) *Location of sampling sites.* (1) Sampling sites must be located at the inlet (if emission reduction testing or documentation of inlet methanol or formaldehyde concentration is required) and outlet of the control device (defined in §63.2292) and prior to any releases to the atmosphere. For control sequences with wet control devices (defined in §63.2292) followed by control devices (defined in §63.2292), sampling sites may be located at the inlet and outlet of the control sequence and prior to any releases to the atmosphere.

(2) Sampling sites for process units meeting compliance options without a control device must be located prior to any releases to the atmosphere. Facilities demonstrating compliance with a production-based compliance option for a process unit equipped with a wet control device must locate sampling sites prior to the wet control device.

(e) *Collection of monitoring data.* You must collect operating parameter monitoring system or continuous emissions monitoring system (CEMS) data at least every 15 minutes during the entire

performance test and determine the parameter or concentration value for the operating requirement during the performance test using the methods specified in paragraphs (k) through (o) of this section.

(f) *Collection of production data.* To comply with any of the production-based compliance options, you must measure and record the process unit throughput during each performance test.

(g) *Nondetect data.* (1) Except as specified in paragraph (g)(2) of this section, all nondetect data (§63.2292) must be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbon (THC) emission rates.

(2) When showing compliance with the production-based compliance options in Table 1A to this subpart, you may treat emissions of an individual HAP as zero if all three of the performance test runs result in a nondetect measurement, and the method detection limit is less than or equal to 1 parts per million by volume, dry basis (ppmvd). Otherwise, nondetect data for individual HAP must be treated as one-half of the method detection limit.

(h) *Calculation of percent reduction across a control system.* When determining the control system efficiency for any control system included in your emissions averaging plan (not to exceed 90 percent) and when complying with any of the compliance options based on percent reduction across a control system in Table 1B to this subpart, as part of the performance test, you must calculate the percent reduction using Equation 1 of this section:

$$PR = CE \times \frac{ER_{in} - ER_{out}}{ER_{in}} (100) \quad (Eq. 1)$$

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Where:

PR = percent reduction, percent;

CE = capture efficiency, percent (determined for reconstituted wood product presses and board coolers as required in Table 4 to this subpart);

ER<sub>in</sub> = emission rate of total HAP (calculated as the sum of the emission rates of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde), THC, formaldehyde, or methanol in the inlet vent stream of the control device, pounds per hour;

ER<sub>out</sub> = emission rate of total HAP (calculated as the sum of the emission rates of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde), THC, formaldehyde, or methanol in the outlet vent stream of the control device, pounds per hour.

(i) *Calculation of mass per unit production.* To comply with any of the production-based compliance options in Table 1A to this subpart, you must calculate your mass per unit production emissions for each performance test run using Equation 2 of this section:

$$MP = \frac{ER_{HAP}}{P \times CE} \quad (Eq. 2)$$

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Where:

MP = mass per unit production, pounds per oven dried ton OR pounds per thousand square feet on a specified thickness basis (see paragraph (j) of this section if you need to convert from one thickness basis to another);

ER<sub>HAP</sub> = emission rate of total HAP (calculated as the sum of the emission rates of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde) in the stack, pounds per hour;

P = process unit production rate (throughput), oven dried tons per hour OR thousand square feet per hour on a specified thickness basis;

CE = capture efficiency, percent (determined for reconstituted wood product presses and board coolers as required in Table 4 to this subpart).

(j) *Thickness basis conversion.* Use Equation 3 of this section to convert from one thickness basis to another:

$$MSF_B = MSF_A \times \frac{A}{B} \quad (Eq. 3)$$

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Where:

MSF<sub>A</sub> = thousand square feet on an A-inch basis;

MSF<sub>B</sub> = thousand square feet on a B-inch basis;

A = old thickness you are converting from, inches;

B = new thickness you are converting to, inches.

(k) *Establishing thermal oxidizer operating requirements.* If you operate a thermal oxidizer, you must establish your thermal oxidizer operating parameters according to paragraphs (k)(1) through (3) of this section.

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

(2) You may establish a different minimum firebox temperature for your thermal oxidizer by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph (k)(1) of this section that demonstrates compliance with the applicable compliance options of this subpart.

(3) If your thermal oxidizer is a combustion unit that accepts process exhaust into the flame zone, then you are exempt from the performance testing and monitoring requirements specified in paragraphs (k)(1) and (2) of this section. To demonstrate initial compliance, you must submit documentation with your Notification of Compliance Status showing that process exhausts controlled by the combustion unit enter into the flame zone.

(l) *Establishing catalytic oxidizer operating requirements.* If you operate a catalytic oxidizer, you must establish your catalytic oxidizer operating parameters according to paragraphs (l)(1) and (2) of this section.

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

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

(m) *Establishing biofilter operating requirements.* If you operate a biofilter, you must establish your biofilter operating requirements according to paragraphs (m)(1) through (3) of this section.

(1) During the performance test, you must continuously monitor the biofilter bed temperature during each of the required 1-hour test runs. To monitor biofilter bed temperature, you may use multiple thermocouples in representative locations throughout the biofilter bed and calculate the average biofilter bed temperature across these thermocouples prior to reducing the temperature data to 15-minute averages for purposes of establishing biofilter bed temperature limits. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs. You may base your biofilter bed temperature range on values recorded during previous performance tests provided that the data used to establish the temperature ranges have been obtained using the test methods required in this subpart. If you use data from previous performance tests, you must certify that the biofilter and associated process unit(s) have not been modified subsequent to the date of the performance tests. Replacement of the biofilter media with the same type of material is not considered a modification of the biofilter for purposes of this section.

(2) For a new biofilter installation, you will be allowed up to 180 days following the compliance date or 180 days following initial startup of the biofilter to complete the requirements in paragraph (m)(1) of this section.

(3) You may expand your biofilter bed temperature operating range by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph (m)(1) of this section that demonstrates compliance with the applicable compliance options of this subpart.

(n) *Establishing operating requirements for process units meeting compliance options without a control device.* If you operate a process unit that meets a compliance option in Table 1A to this subpart, or is a process unit that generates debits in an emissions average without the use of a control device, you must establish your process unit operating parameters according to paragraphs (n)(1) through (2) of this section.

(1) During the performance test, you must identify and document the process unit controlling parameter(s) that affect total HAP emissions during the three-run performance test. The controlling parameters you identify must coincide with the representative operating conditions you describe according to §63.2262(b)(2). For each parameter, you must specify appropriate monitoring methods, monitoring frequencies, and for continuously monitored parameters, averaging times not to exceed 24 hours. The operating limit for each controlling parameter must then be established as the minimum,

maximum, range, or average (as appropriate depending on the parameter) recorded during the performance test. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

(2) You may establish different controlling parameter limits for your process unit by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph (n)(1) of this section that demonstrates compliance with the compliance options in Table 1A to this subpart or is used to establish emission averaging debits for an uncontrolled process unit.

(o) *Establishing operating requirements using THC CEMS.* If you choose to meet the operating requirements by monitoring THC concentration instead of monitoring control device or process operating parameters, you must establish your THC concentration operating requirement according to paragraphs (o)(1) through (2) of this section.

(1) During the performance test, you must continuously monitor THC concentration using your CEMS during each of the required 1-hour test runs. The maximum THC concentration must then be established as the average of the three maximum 15-minute THC concentrations monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of THC concentration values under different operating conditions.

(2) You may establish a different maximum THC concentration by submitting the notification specified in §63.2280(g) and conducting a repeat performance test as specified in paragraph (o)(1) of this section that demonstrates compliance with the compliance options in Tables 1A and 1B to this subpart.

[69 FR 46011, July 30, 2004, as amended at 71 FR 8372, Feb. 16, 2006]

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#### **§63.2263 Initial compliance demonstration for a dry rotary dryer.**

If you operate a dry rotary dryer, you must demonstrate that your dryer processes furnish with an inlet moisture content of less than or equal to 30 percent (by weight, dry basis) and operates with a dryer inlet temperature of less than or equal to 600 °F. You must designate and clearly identify each dry rotary dryer. You must record the inlet furnish moisture content (dry basis) and inlet dryer operating temperature according to §§63.2269(a), (b), and (c) and 63.2270 for a minimum of 30 calendar days. You must submit the highest recorded 24-hour average inlet furnish moisture content and the highest recorded 24-hour average dryer inlet temperature with your Notification of Compliance Status. In addition, you must submit with the Notification of Compliance Status a signed statement by a responsible official that certifies with truth, accuracy, and completeness that the dry rotary dryer will dry furnish with a maximum inlet moisture content less than or equal to 30 percent (by weight, dry basis) and will operate with a maximum inlet temperature of less than or equal to 600 °F in the future.

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#### **§63.2264 Initial compliance demonstration for a hardwood veneer dryer.**

If you operate a hardwood veneer dryer, you must record the annual volume percentage of softwood veneer species processed in the dryer as follows:

(a) Use Equation 1 of this section to calculate the annual volume percentage of softwood species dried:

$$SW\% = \frac{SW}{T} (100) \quad (Eq. 1)$$

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Where:

SW% = annual volume percent softwood species dried;

SW = softwood veneer dried during the previous 12 months, thousand square feet (  $\frac{3}{8}$  -inch basis);

T = total softwood and hardwood veneer dried during the previous 12 months, thousand square feet (  $\frac{3}{8}$  -inch basis).

(b) You must designate and clearly identify each hardwood veneer dryer. Submit with the Notification of Compliance Status the annual volume percentage of softwood species dried in the dryer based on your dryer production for the 12 months prior to the compliance date specified for your source in §63.2233. If you did not dry any softwood species in the dryer during the 12 months prior to the compliance date, then you need only to submit a statement indicating that no softwood species were dried. In addition, submit with the Notification of Compliance Status a signed statement by a responsible official that certifies with truth, accuracy, and completeness that the veneer dryer will be used to process less than 30 volume percent softwood species in the future.

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#### **§63.2265 Initial compliance demonstration for a softwood veneer dryer.**

If you operate a softwood veneer dryer, you must develop a plan for review and approval for minimizing fugitive emissions from the veneer dryer heated zones, and you must submit the plan with your Notification of Compliance Status.

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#### **§63.2266 Initial compliance demonstration for a veneer redryer.**

If you operate a veneer redryer, you must record the inlet moisture content of the veneer processed in the redryer according to §§63.2269(a) and (c) and 63.2270 for a minimum of 30 calendar days. You must designate and clearly identify each veneer redryer. You must submit the highest recorded 24-hour average inlet veneer moisture content with your Notification of Compliance Status to show that your veneer redryer processes veneer with an inlet moisture content of less than or equal to 25 percent (by weight, dry basis). In addition, submit with the Notification of Compliance Status a signed statement by a responsible official that certifies with truth, accuracy, and completeness that the veneer redryer will dry veneer with a moisture content less than 25 percent (by weight, dry basis) in the future.

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#### **§63.2267 Initial compliance demonstration for a reconstituted wood product press or board cooler.**

If you operate a reconstituted wood product press at a new or existing affected source or a reconstituted wood product board cooler at a new affected source, then you must either use a wood products enclosure as defined in §63.2292 or measure the capture efficiency of the capture device for the press or board cooler using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as

appropriate), or using the alternative tracer gas method contained in appendix A to this subpart. You must submit documentation that the wood products enclosure meets the press enclosure design criteria in §63.2292 or the results of the capture efficiency verification with your Notification of Compliance Status.

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### **§63.2268 Initial compliance demonstration for a wet control device.**

If you use a wet control device as the sole means of reducing HAP emissions, you must develop and implement a plan for review and approval to address how organic HAP captured in the wastewater from the wet control device is contained or destroyed to minimize re-release to the atmosphere such that the desired emissions reductions are obtained. You must submit the plan with your Notification of Compliance Status.

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### **§63.2269 What are my monitoring installation, operation, and maintenance requirements?**

(a) *General continuous parameter monitoring requirements.* You must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of this section.

(1) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.

(2) At all times, you must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(3) Record the results of each inspection, calibration, and validation check.

(b) *Temperature monitoring.* For each temperature monitoring device, you must meet the requirements in paragraphs (a) and (b)(1) through (6) of this section.

(1) Locate the temperature sensor in a position that provides a representative temperature.

(2) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.

(3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.

(4) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, you must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.

(5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

(6) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.



(c) Wood moisture monitoring. For each furnish or veneer moisture meter, you must meet the requirements in paragraphs (a)(1) through (3) and paragraphs (c)(1) through (5) of this section.

(1) For dry rotary dryers, use a continuous moisture monitor with a minimum accuracy of 1 percent (dry basis) moisture or better in the 25 to 35 percent (dry basis) moisture content range. For veneer redryers, use a continuous moisture monitor with a minimum accuracy of 3 percent (dry basis) moisture or better in the 15 to 25 percent (dry basis) moisture content range. Alternatively, you may use a continuous moisture monitor with a minimum accuracy of 5 percent (dry basis) moisture or better for dry rotary dryers used to dry furnish with less than 25 percent (dry basis) moisture or for veneer redryers used to redry veneer with less than 20 percent (dry basis) moisture.

(2) Locate the moisture monitor in a position that provides a representative measure of furnish or veneer moisture.

(3) Calibrate the moisture monitor based on the procedures specified by the moisture monitor manufacturer at least once per semiannual compliance period (or more frequently if recommended by the moisture monitor manufacturer).

(4) At least quarterly, inspect all components of the moisture monitor for integrity and all electrical connections for continuity.

(5) Use Equation 1 of this section to convert percent moisture measurements wet basis to a dry basis:

$$MC_{dry} = \frac{MC_{wet}/100}{1 - (MC_{wet}/100)} (100) \quad (Eq. 1)$$

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Where:

$MC_{dry}$  = percent moisture content of wood material (weight percent, dry basis);

$MC_{wet}$  = percent moisture content of wood material (weight percent, wet basis).

(d) *Continuous emission monitoring system(s)*. Each CEMS must be installed, operated, and maintained according to paragraphs (d)(1) through (4) of this section.

(1) Each CEMS for monitoring THC concentration must be installed, operated, and maintained according to Performance Specification 8 of 40 CFR part 60, appendix B. You must also comply with Procedure 1 of 40 CFR part 60, appendix F.

(2) You must conduct a performance evaluation of each CEMS according to the requirements in §63.8 and according to Performance Specification 8 of 40 CFR part 60, appendix B.

(3) As specified in §63.8(c)(4)(ii), each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

(4) The CEMS data must be reduced as specified in §§63.8(g)(2) and 63.2270(d) and (e).

[69 FR 46011, July 30, 2004, as amended at 71 FR 8372, Feb. 16, 2006]

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## CONTINUOUS COMPLIANCE REQUIREMENTS

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### §63.2270 How do I monitor and collect data to demonstrate continuous compliance?

(a) You must monitor and collect data according to this section.

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

(c) You may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. You must use all the data collected during all other periods in assessing the operation of the control system.

(d) Except as provided in paragraph (e) of this section, determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (b) and (c) of this section).

(e) For dry rotary dryer and veneer redryer wood moisture monitoring, dry rotary dryer temperature monitoring, biofilter bed temperature monitoring, and biofilter outlet THC monitoring, determine the 24-hour block average of all recorded readings, calculated after every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours (excluding periods described in paragraphs (b) and (c) of this section).

(f) To calculate the data averages for each 3-hour or 24-hour averaging period, you must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (*i.e.*, not from periods described in paragraphs (b) and (c) of this section).

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### §63.2271 How do I demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements?

(a) You must demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in §§63.2240 and 63.2241 that apply to you according to the methods specified in Tables 7 and 8 to this subpart.

(b) You must report each instance in which you did not meet each compliance option, operating requirement, and work practice requirement in Tables 7 and 8 to this subpart that applies to you. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (b)(1) through (3) of this section. These instances are deviations from the compliance options, operating requirements, and work practice requirements in this subpart. These deviations must be reported according to the requirements in §63.2281.

(1) [Reserved]

(2) Consistent with §§63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if you demonstrate to the EPA Administrator's satisfaction that you were operating in accordance with §63.6(e)(1). The EPA Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in §63.6(e).

(3) Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if you demonstrate to the EPA Administrator's satisfaction that you were operating in accordance with the approved routine control device maintenance exemption.

[69 FR 46011, July 30, 2004, as amended at 71 FR 20463, Apr. 20, 2006]

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## NOTIFICATIONS, REPORTS, AND RECORDS

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### **§63.2280 What notifications must I submit and when?**

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified.

(b) You must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in §63.9(b)(2).

(c) If you are required to conduct a performance test, you must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in §63.7(b)(1).

(d) If you are required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 to this subpart, you must submit a Notification of Compliance Status as specified in §63.9(h)(2)(ii).

(1) For each initial compliance demonstration required in Table 5 or 6 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.

(2) For each initial compliance demonstration required in Tables 5 and 6 to this subpart that includes a performance test conducted according to the requirements in Table 4 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to §63.10(d)(2).

(e) If you request a routine control device maintenance exemption according to §63.2251, you must submit your request for the exemption no later than 30 days before the compliance date.

(f) If you use the emissions averaging compliance option in §63.2240(c), you must submit an Emissions Averaging Plan to the EPA Administrator for approval no later than 1 year before the compliance date or no later than 1 year before the date you would begin using an emissions average, whichever is later. The Emissions Averaging Plan must include the information in paragraphs (f)(1) through (6) of this section.

(1) Identification of all the process units to be included in the emissions average indicating which process units will be used to generate credits, and which process units that are subject to compliance options in Tables 1A and 1B to this subpart will be uncontrolled (used to generate debits) or under-controlled (used to generate debits and credits).

(2) Description of the control system used to generate emission credits for each process unit used to generate credits.

(3) Determination of the total HAP control efficiency for the control system used to generate emission credits for each credit-generating process unit.

(4) Calculation of the RMR and AMR, as calculated using Equations 1 through 3 of §63.2240(c)(1).

(5) Documentation of total HAP measurements made according to §63.2240(c)(2)(iv) and other relevant documentation to support calculation of the RMR and AMR.

(6) A summary of the operating parameters you will monitor and monitoring methods for each debit-generating and credit-generating process unit.

(g) You must notify the EPA Administrator within 30 days before you take any of the actions specified in paragraphs (g)(1) through (3) of this section.

(1) You modify or replace the control system for any process unit subject to the compliance options and operating requirements in this subpart.

(2) You shut down any process unit included in your Emissions Averaging Plan.

(3) You change a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

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### **§63.2281 What reports must I submit and when?**

(a) You must submit each report in Table 9 to this subpart that applies to you.

(b) Unless the EPA Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 9 to this subpart and as specified in paragraphs (b)(1) through (5) of this section.

(1) The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.2233 ending on June 30 or December 31, and lasting at least 6

months, but less than 12 months. For example, if your compliance date is March 1, then the first semiannual reporting period would begin on March 1 and end on December 31.

(2) The first compliance report must be postmarked or delivered no later than July 31 or January 31 for compliance periods ending on June 30 and December 31, respectively.

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

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

(5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of this section.

(c) The compliance report must contain the information in paragraphs (c)(1) through (8) of this section.

(1) Company name and address.

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

(3) Date of report and beginning and ending dates of the reporting period.

(4) If you had a startup, shutdown, or malfunction during the reporting period and you took actions consistent with your SSMP, the compliance report must include the information specified in §63.10(d)(5)(i).

(5) A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in paragraphs (c)(5)(i) through (iii) of this section.

(i) The date and time when the control device was shut down and restarted.

(ii) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.

(iii) A statement of whether or not the control device maintenance was included in your approved routine control device maintenance exemption developed pursuant to §63.2251. If the control device maintenance was included in your approved routine control device maintenance exemption, then you must report the information in paragraphs (c)(5)(iii)(A) through (C) of this section.

(A) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.

(B) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period.

(C) Based on the information recorded under paragraphs (c)(5)(iii)(A) and (B) of this section for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of this section.

$$RM = \frac{DT_p + DT_c}{PU_p + PU_c} \quad (Eq. 1)$$

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Where:

RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance;

PU<sub>p</sub> = Process unit uptime for the previous semiannual compliance period;

PU<sub>c</sub> = Process unit uptime for the current semiannual compliance period;

DT<sub>p</sub> = Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period;

DT<sub>c</sub> = Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.

(6) The results of any performance tests conducted during the semiannual reporting period.

(7) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 to this subpart, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period.

(8) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

(d) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to this subpart that occurs at an affected source where you are not using a CMS to comply with the compliance options, operating requirements, or work practice requirements in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (6) of this section and in paragraphs (d)(1) and (2) of this section. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

(1) The total operating time of each affected source during the reporting period.

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

(e) For each deviation from a compliance option or operating requirement occurring at an affected source where you are using a CMS to comply with the compliance options and operating requirements in this subpart, you must include the information in paragraphs (c)(1) through (6) and paragraphs (e)(1) through (11) of this section. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.

- (1) The date and time that each malfunction started and stopped.
  - (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - (3) The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8).
  - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in your approved routine control device maintenance exemption; or during another period.
  - (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
  - (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - (8) A brief description of the process units.
  - (9) A brief description of the CMS.
  - (10) The date of the latest CMS certification or audit.
  - (11) A description of any changes in CMS, processes, or controls since the last reporting period.
- (f) If you comply with the emissions averaging compliance option in §63.2240(c), you must include in your semiannual compliance report calculations based on operating data from the semiannual reporting period that demonstrate that actual mass removal equals or exceeds the required mass removal.
- (g) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to this subpart along with, or as part of, the semiannual monitoring report required by §70.6(a)(3)(iii)(A) or §71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

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#### **§63.2282 What records must I keep?**

- (a) You must keep the records listed in paragraphs (a)(1) through (4) of this section.

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

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) Documentation of your approved routine control device maintenance exemption, if you request such an exemption under §63.2251.

(4) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(b) You must keep the records required in Tables 7 and 8 to this subpart to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies to you.

(c) For each CEMS, you must keep the following records.

(1) Records described in §63.10(b)(2)(vi) through (xi).

(2) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).

(3) Request for alternatives to relative accuracy testing for CEMS as required in §63.8(f)(6)(i).

(4) Records of the date and time that each deviation started and stopped, and whether the deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(d) If you comply with the emissions averaging compliance option in §63.2240(c), you must keep records of all information required to calculate emission debits and credits.

(e) If you operate a catalytic oxidizer, you must keep records of annual catalyst activity checks and subsequent corrective actions.

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### **§63.2283 In what form and how long must I keep my records?**

(a) Your records must be in a form suitable and readily available for expeditious review as specified in §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You can keep the records offsite for the remaining 3 years.

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## **OTHER REQUIREMENTS AND INFORMATION**



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### **§63.2290 What parts of the General Provisions apply to me?**

Table 10 to this subpart shows which parts of the General Provisions in §§63.1 through 63.13 apply to you.

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### **§63.2291 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by the U.S. EPA or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the compliance options, operating requirements, and work practice requirements in §§63.2240 and 63.2241 as specified in §63.6(g). For the purposes of delegation authority under 40 CFR part 63, subpart E, “compliance options” represent “emission limits”; “operating requirements” represent “operating limits”; and “work practice requirements” represent “work practice standards.”

(2) Approval of major alternatives to test methods as specified in §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring as specified in §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting as specified in §63.10(f) and as defined in §63.90.

[69 FR 46011, July 30, 2004, as amended at 72 FR 61063, Oct. 29, 2007]

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### **§63.2292 What definitions apply to this subpart?**

Terms used in this subpart are defined in the Clean Air Act (CAA), in 40 CFR 63.2, the General Provisions, and in this section as follows:

*Affected source* means the collection of dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing of plywood and composite wood products. The affected source includes, but is not limited to, green end operations, refining, drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), resin preparation, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing

operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other NESHAP). The affected source also includes onsite storage of raw materials used in the manufacture of plywood and/or composite wood products, such as resins; onsite wastewater treatment operations specifically associated with plywood and composite wood products manufacturing; and miscellaneous coating operations (defined elsewhere in this section). The affected source includes lumber kilns at PCWP manufacturing facilities and at any other kind of facility.

*Agricultural fiber* means the fiber of an annual agricultural crop. Examples of agricultural fibers include, but are not limited to, wheat straw, rice straw, and bagasse.

*Biofilter* means an enclosed control system such as a tank or series of tanks with a fixed roof that contact emissions with a solid media (such as bark) and use microbiological activity to transform organic pollutants in a process exhaust stream to innocuous compounds such as carbon dioxide, water, and inorganic salts. Wastewater treatment systems such as aeration lagoons or activated sludge systems are not considered to be biofilters.

*Capture device* means a hood, enclosure, or other means of collecting emissions into a duct so that the emissions can be measured.

*Capture efficiency* means the fraction (expressed as a percentage) of the pollutants from an emission source that are collected by a capture device.

*Catalytic oxidizer* means a control system that combusts or oxidizes, in the presence of a catalyst, exhaust gas from a process unit. Catalytic oxidizers include regenerative catalytic oxidizers and thermal catalytic oxidizers.

*Combustion unit* means a dryer burner, process heater, or boiler. Combustion units may be used for combustion of organic HAP emissions.

*Control device* means any equipment that reduces the quantity of HAP emitted to the air. The device may destroy the HAP or secure the HAP for subsequent recovery. Control devices include, but are not limited to, thermal or catalytic oxidizers, combustion units that incinerate process exhausts, biofilters, and condensers.

*Control system or add-on control system* means the combination of capture and control devices used to reduce HAP emissions to the atmosphere.

*Conveyor strand dryer* means a conveyor dryer used to reduce the moisture of wood strands used in the manufacture of oriented strandboard, laminated strand lumber, or other wood strand-based products. A *conveyor strand dryer* is a process unit.

*Conveyor strand dryer zone* means each portion of a conveyor strand dryer with a separate heat exchange system and exhaust vent(s). Conveyor strand dryers contain multiple zones (e.g., three zones), which may be divided into multiple sections.

*Deviation* means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including, but not limited to, any compliance option, operating requirement, or work practice requirement;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart, and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any compliance option, operating requirement, or work practice requirement in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart. A deviation is not always a violation. The determination of whether a deviation constitutes a violation of the standard is up to the discretion of the entity responsible for enforcement of the standards.

*Direct-fired process unit* means a process unit that is heated by the passing of combustion exhaust through the process unit such that the process material is contacted by the combustion exhaust.

*Dryer heated zones* means the zones of a softwood veneer dryer or fiberboard mat dryer that are equipped with heating and hot air circulation units. The cooling zone(s) of the dryer through which ambient air is blown are not part of the dryer heated zones.

*Dry forming* means the process of making a mat of resinated fiber to be compressed into a reconstituted wood product such as particleboard, oriented strandboard, medium density fiberboard, or hardboard.

*Dry rotary dryer* means a rotary dryer that dries wood particles or fibers with a maximum inlet moisture content of less than or equal to 30 percent (by weight, dry basis) and operates with a maximum inlet temperature of less than or equal to 600 °F. A dry rotary dryer is a process unit.

*Engineered wood product* means a product made with lumber, veneers, strands of wood, or from other small wood elements that are bound together with resin. Engineered wood products include, but are not limited to, laminated strand lumber, laminated veneer lumber, parallel strand lumber, wood I-joists, and glue-laminated beams.

*Fiber* means the discrete elements of wood or similar cellulosic material, which are separated by mechanical means, as in refining, that can be formed into boards.

*Fiberboard* means a composite panel composed of cellulosic fibers (usually wood or agricultural material) made by wet forming and compacting a mat of fibers. Fiberboard density generally is less than 0.50 grams per cubic centimeter (31.5 pounds per cubic foot).

*Fiberboard mat dryer* means a dryer used to reduce the moisture of wet-formed wood fiber mats by applying heat. A *fiberboard mat dryer* is a process unit.

*Flame zone* means the portion of the combustion chamber in a combustion unit that is occupied by the flame envelope.

*Furnish* means the fibers, particles, or strands used for making boards.

*Glue-laminated beam* means a structural wood beam made by bonding lumber together along its faces with resin.

*Green rotary dryer* means a rotary dryer that dries wood particles or fibers with an inlet moisture content of greater than 30 percent (by weight, dry basis) at any dryer inlet temperature or operates with an inlet temperature of greater than 600 °F with any inlet moisture content. A *green rotary dryer* is a process unit.

*Group 1 miscellaneous coating operations* means application of edge seals, nail lines, logo (or other information) paint, shelving edge fillers, trademark/gradestamp inks, and wood putty patches to plywood and composite wood products (except kiln-dried lumber) on the same site where the plywood and composite wood products are manufactured. Group 1 miscellaneous coating operations also include application of synthetic patches to plywood at new affected sources.

*Hardboard* means a composite panel composed of inter-felted cellulosic fibers made by dry or wet forming and pressing of a resinated fiber mat. Hardboard generally has a density of 0.50 grams per cubic centimeter (31.5 pounds per cubic foot) or greater.

*Hardboard oven* means an oven used to heat treat or temper hardboard after hot pressing. Humidification chambers are not considered as part of hardboard ovens. A *hardboard oven* is a process unit.

*Hardwood* means the wood of a broad-leaved tree, either deciduous or evergreen. Examples of hardwoods include, but are not limited to, aspen, birch, poplar, and oak.

*Hardwood veneer dryer* means a dryer that removes excess moisture from veneer by conveying the veneer through a heated medium on rollers, belts, cables, or wire mesh. Hardwood veneer dryers are used to dry veneer with less than 30 percent softwood species on an annual volume basis. Veneer kilns that operate as batch units, veneer dryers heated by radio frequency or microwaves that are used to redry veneer, and veneer redryers (defined elsewhere in this section) that are heated by conventional means are not considered to be hardwood veneer dryers. A *hardwood veneer dryer* is a process unit.

*Kiln-dried lumber* means solid wood lumber that has been dried in a lumber kiln.

*Laminated strand lumber (LSL)* means a composite product formed into a billet made of thin wood strands cut from whole logs, resinated, and pressed together with the grain of each strand oriented parallel to the length of the finished product.

*Laminated veneer lumber (LVL)* means a composite product formed into a billet made from layers of resinated wood veneer sheets or pieces pressed together with the grain of each veneer aligned primarily along the length of the finished product. *Laminated veneer lumber* is also known as parallel strand lumber (PSL).

*Lumber* means boards or planks sawed or split from logs or timber, including logs or timber processed for use as utility poles or other wood components. Lumber can be either green (non-dried) or dried. Lumber is typically either air-dried or kiln-dried.

*Lumber kiln* means an enclosed dryer operated by applying heat to reduce the moisture content of lumber.

*Medium density fiberboard (MDF)* means a composite panel composed of cellulosic fibers (usually wood or agricultural fiber) made by dry forming and pressing of a resinated fiber mat.

*Method detection limit* means the minimum concentration of an analyte that can be determined with 99 percent confidence that the true value is greater than zero.

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

and application of asphalt, clay slurry, or titanium dioxide coatings to fiberboard at the same site of fiberboard manufacture.

*Molded particleboard* means a shaped composite product (other than a composite panel) composed primarily of cellulosic materials (usually wood or agricultural fiber) generally in the form of discrete pieces or particles, as distinguished from fibers, which are pressed together with resin.

*MSF* means thousand square feet (92.9 square meters). Square footage of panels is usually measured on a thickness basis, such as  $\frac{3}{8}$ -inch, to define the total volume of panels. Equation 6 of §63.2262(j) shows how to convert from one thickness basis to another.

*Nondetect data* means, for the purposes of this subpart, any value that is below the method detection limit.

*Non-HAP coating* means a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds.

*1-hour period* means a 60-minute period.

*Oriented strandboard (OSB)* means a composite panel produced from thin wood strands cut from whole logs, formed into resinated layers (with the grain of strands in one layer oriented perpendicular to the strands in adjacent layers), and pressed.

*Oven-dried ton(s) (ODT)* means tons of wood dried until all of the moisture in the wood is removed. One oven-dried ton equals 907 oven-dried kilograms.

*Parallel strand lumber (PSL)* means a composite product formed into a billet made from layers of resinated wood veneer sheets or pieces pressed together with the grain of each veneer aligned primarily along the length of the finished product. *Parallel strand lumber* is also known as laminated veneer lumber (LVL).

*Partial wood products enclosure* means an enclosure that does not meet the design criteria for a wood products enclosure as defined in this subpart.

*Particle* means a discrete, small piece of cellulosic material (usually wood or agricultural fiber) produced mechanically and used as the aggregate for a particleboard.

*Particleboard* means a composite panel composed primarily of cellulosic materials (usually wood or agricultural fiber) generally in the form of discrete pieces or particles, as distinguished from fibers, which are pressed together with resin.

*Plywood* means a panel product consisting of layers of wood veneers hot pressed together with resin. Plywood includes panel products made by hot pressing (with resin) veneers to a substrate such as particleboard, medium density fiberboard, or lumber. Plywood products may be flat or curved.

*Plywood and composite wood products (PCWP) manufacturing facility* means a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a panel, engineered wood product, or other product defined in §63.2292. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, molded particleboard, oriented strandboard, hardboard, fiberboard, medium density

fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

*Press predryer* means a dryer used to reduce the moisture and elevate the temperature by applying heat to a wet-formed fiber mat before the mat enters a hot press. A *press predryer* is a process unit.

*Pressurized refiner* means a piece of equipment operated under pressure for preheating (usually by steaming) wood material and refining (rubbing or grinding) the wood material into fibers. Pressurized refiners are operated with continuous infeed and outfeed of wood material and maintain elevated internal pressures (*i.e.*, there is no pressure release) throughout the preheating and refining process. A *pressurized refiner* is a process unit.

*Primary tube dryer* means a single-stage tube dryer or the first stage of a multi-stage tube dryer. Tube dryer stages are separated by vents for removal of moist gases between stages (*e.g.*, a product cyclone at the end of a single-stage dryer or between the first and second stages of a multi-stage tube dryer). The first stage of a multi-stage tube dryer is used to remove the majority of the moisture from the wood furnish (compared to the moisture reduction in subsequent stages of the tube dryer). Blow-lines used to apply resin are considered part of the primary tube dryer. A *primary tube dryer* is a process unit.

*Process unit* means equipment classified according to its function such as a blender, dryer, press, former, or board cooler.

*Reconstituted wood product board cooler* means a piece of equipment designed to reduce the temperature of a board by means of forced air or convection within a controlled time period after the board exits the reconstituted wood product press unloader. Board coolers include wicket and star type coolers commonly found at medium density fiberboard and particleboard plants. Board coolers do not include cooling sections of dryers (*e.g.*, veneer dryers or fiberboard mat dryers) or coolers integrated into or following hardboard bake ovens or humidifiers. A *reconstituted wood product board cooler* is a process unit.

*Reconstituted wood product press* means a press, including (if applicable) the press unloader, that presses a resinated mat of wood fibers, particles, or strands between hot platens or hot rollers to compact and set the mat into a panel by simultaneous application of heat and pressure. Reconstituted wood product presses are used in the manufacture of hardboard, medium density fiberboard, particleboard, and oriented strandboard. Extruders are not considered to be reconstituted wood product presses. A *reconstituted wood product press* is a process unit.

*Representative operating conditions* means operation of a process unit during performance testing under the conditions that the process unit will typically be operating in the future, including use of a representative range of materials (*e.g.*, wood material of a typical species mix and moisture content or typical resin formulation) and representative operating temperature range.

*Resin* means the synthetic adhesive (including glue) or natural binder, including additives, used to bond wood or other cellulosic materials together to produce plywood and composite wood products.

*Responsible official* means responsible official as defined in 40 CFR 70.2 and 40 CFR 71.2.

*Rotary strand dryer* means a rotary dryer operated by applying heat and used to reduce the moisture of wood strands used in the manufacture of oriented strandboard, laminated strand lumber, or other wood strand-based products. A *rotary strand dryer* is a process unit.

*Secondary tube dryer* means the second stage and subsequent stages following the primary stage of a multi-stage tube dryer. Secondary tube dryers, also referred to as relay dryers, operate at lower

temperatures than the primary tube dryer they follow. Secondary tube dryers are used to remove only a small amount of the furnish moisture compared to the furnish moisture reduction across the primary tube dryer. A *secondary tube dryer* is a process unit.

*Softwood* means the wood of a coniferous tree. Examples of softwoods include, but are not limited to, Southern yellow pine, Douglas fir, and White spruce.

*Softwood veneer dryer* means a dryer that removes excess moisture from veneer by conveying the veneer through a heated medium, generally on rollers, belts, cables, or wire mesh. Softwood veneer dryers are used to dry veneer with greater than or equal to 30 percent softwood species on an annual volume basis. Veneer kilns that operate as batch units, veneer dryers heated by radio frequency or microwaves that are used to redry veneer, and veneer redryers (defined elsewhere in this section) that are heated by conventional means are not considered to be softwood veneer dryers. A *softwood veneer dryer* is a process unit.

*Startup* means bringing equipment online and starting the production process.

*Startup, initial* means the first time equipment is put into operation. Initial startup does not include operation solely for testing equipment. Initial startup does not include subsequent startups (as defined in this section) following malfunction or shutdowns or following changes in product or between batch operations. Initial startup does not include startup of equipment that occurred when the source was an area source.

*Startup, shutdown, and malfunction plan (SSMP)* means a plan developed according to the provisions of §63.6(e)(3).

*Strand* means a long (with respect to thickness and width), flat wood piece specially cut from a log for use in oriented strandboard, laminated strand lumber, or other wood strand-based product.

*Temporary total enclosure (TTE)* means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source, as defined in Method 204 of 40 CFR part 51, appendix M.

*Thermal oxidizer* means a control system that combusts or oxidizes exhaust gas from a process unit. Thermal oxidizers include regenerative thermal oxidizers and combustion units.

*Total hazardous air pollutant emissions* means, for purposes of this subpart, the sum of the emissions of the following six compounds: acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde.

*Tube dryer* means a single-stage or multi-stage dryer operated by applying heat to reduce the moisture of wood fibers or particles as they are conveyed (usually pneumatically) through the dryer. Resin may or may not be applied to the wood material before it enters the tube dryer. Tube dryers do not include pneumatic fiber transport systems that use temperature and humidity conditioned pneumatic system supply air in order to prevent cooling of the wood fiber as it is moved through the process. A *tube dryer* is a process unit.

*Veneer* means thin sheets of wood peeled or sliced from logs for use in the manufacture of wood products such as plywood, laminated veneer lumber, or other products.

*Veneer redryer* means a dryer heated by conventional means, such as direct wood-fired, direct-gas-fired, or steam heated, that is used to redry veneer that has been previously dried. Because the veneer dried in a veneer redryer has been previously dried, the inlet moisture content of the veneer entering the

redryer is less than 25 percent (by weight, dry basis). Batch units used to redry veneer (such as redry cookers) are not considered to be veneer redryers. A *veneer redryer* is a process unit.

*Wet control device* means any equipment that uses water as a means of collecting an air pollutant. Wet control devices include scrubbers, wet electrostatic precipitators, and electrified filter beds. Wet control devices do not include biofilters or other equipment that destroys or degrades HAP.

*Wet forming* means the process of making a slurry of water, fiber, and additives into a mat of fibers to be compressed into a fiberboard or hardboard product.

*Wood I-joists* means a structural wood beam with an I-shaped cross section formed by bonding (with resin) wood or laminated veneer lumber flanges onto a web cut from a panel such as plywood or oriented strandboard.

*Wood products enclosure* means a permanently installed containment that was designed to meet the following physical design criteria:

(1) Any natural draft opening shall be at least four equivalent opening diameters from each HAP-emitting point, except for where board enters and exits the enclosure, unless otherwise specified by the EPA Administrator.

(2) The total area of all natural draft openings shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

(3) The average facial velocity of air through all natural draft openings shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all natural draft openings shall be into the enclosure.

(4) All access doors and windows whose areas are not included in item 2 of this definition and are not included in the calculation of facial velocity in item 3 of this definition shall be closed during routine operation of the process.

(5) The enclosure is designed and maintained to capture all emissions for discharge through a control device.

*Work practice requirement* means any design, equipment, work practice, or operational standard, or combination thereof, that is promulgated pursuant to section 112(h) of the CAA.

[69 FR 46011, July 30, 2004, as amended at 71 FR 8372, Feb. 16, 2006]

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**Table 1A to Subpart DDDD of Part 63—Production-Based Compliance Options**

<b>For the following process units . . .</b>	<b>You must meet the following production-based compliance option (total HAP<sup>a</sup> basis) . . .</b>
(1) Fiberboard mat dryer heated zones (at new affected sources only)	0.022 lb/MSF $\frac{1}{2}$ "
(2) Green rotary dryers	0.058 lb/ODT.



(3) Hardboard ovens	0.022 lb/MSF $\frac{1}{8}$ " .
(4) Press predryers (at new affected sources only)	0.037 lb/MSF $\frac{1}{2}$ " .
(5) Pressurized refiners	0.039 lb/ODT.
(6) Primary tube dryers	0.26 lb/ODT.
(7) Reconstituted wood product board coolers (at new affected sources only)	0.014 lb/MSF $\frac{3}{4}$ " .
(8) Reconstituted wood product presses	0.30 lb/MSF $\frac{3}{4}$ " .
(9) Softwood veneer dryer heated zones	0.022 lb/MSF $\frac{3}{8}$ " .
(10) Rotary strand dryers	0.18 lb/ODT.
(11) Secondary tube dryers	0.010 lb/ODT.

<sup>a</sup>Total HAP, as defined in §63.2292, includes acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. lb/ODT = pounds per oven-dried ton; lb/MSF = pounds per thousand square feet with a specified thickness basis (inches). Section 63.2262(j) shows how to convert from one thickness basis to another.

NOTE: There is no production-based compliance option for conveyor strand dryers.

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**Table 1B to Subpart DDDD of Part 63—Add-on Control Systems Compliance Options**

<b>For each of the following process units . . .</b>	<b>You must comply with one of the following six compliance options by using an emissions control system . . .</b>
Fiberboard mat dryer heated zones (at new affected sources only); green rotary dryers; hardboard ovens; press predryers (at new affected sources only); pressurized refiners; primary tube dryers; secondary tube dryers; reconstituted wood product board coolers (at new affected sources only); reconstituted wood product presses; softwood veneer dryer heated zones; rotary strand dryers; conveyor strand dryer zone one (at existing affected sources); and conveyor strand dryer zones one and two (at new affected sources)	(1) Reduce emissions of total HAP, measured as THC (as carbon) <sup>a</sup> , by 90 percent; or (2) Limit emissions of total HAP, measured as THC (as carbon) <sup>a</sup> , to 20 ppmvd; or (3) Reduce methanol emissions by 90 percent; or (4) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or

	<p>(5) Reduce formaldehyde emissions by 90 percent; or</p> <p>(6) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.</p>
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<sup>a</sup>You may choose to subtract methane from THC as carbon measurements.

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**Table 2 to Subpart DDDD of Part 63—Operating Requirements**

<b>If you operate a(n) . . .</b>	<b>You must . . .</b>	<b>Or you must . . .</b>
(1) Thermal oxidizer	Maintain the 3-hour block average firebox temperature above the minimum temperature established during the performance test	Maintain the 3-hour block average THC concentration <sup>a</sup> in the thermal oxidizer exhaust below the maximum concentration established during the performance test.
(2) Catalytic oxidizer	Maintain the 3-hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test; AND check the activity level of a representative sample of the catalyst at least every 12 months	Maintain the 3-hour block average THC concentration <sup>a</sup> in the catalytic oxidizer exhaust below the maximum concentration established during the performance test.
(3) Biofilter	Maintain the 24-hour block biofilter bed temperature within the range established according to §63.2262(m)	Maintain the 24-hour block average THC concentration <sup>a</sup> in the biofilter exhaust below the maximum concentration established during the performance test.
(4) Control device other than a thermal oxidizer, catalytic oxidizer, or biofilter	Petition the EPA Administrator for site-specific operating parameter(s) to be established during the performance test and maintain the average operating parameter(s) within the range(s) established during the performance test	Maintain the 3-hour block average THC concentration <sup>a</sup> in the control device exhaust below the maximum concentration established during the performance test.
(5) Process unit that meets	Maintain on a daily basis the	Maintain the 3-hour block

a compliance option in Table 1A of this subpart, or a process unit that generates debits in an emissions average without the use of a control device	process unit controlling operating parameter(s) within the ranges established during the performance test according to §63.2262(n)	average THC concentration <sup>a</sup> in the process unit exhaust below the maximum concentration established during the performance test.
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<sup>a</sup>You may choose to subtract methane from THC measurements.

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**Table 3 to Subpart DDDD of Part 63—Work Practice Requirements**

<b>For the following process units at existing or new affected sources . . .</b>	<b>You must . . .</b>
(1) Dry rotary dryers	Process furnish with a 24-hour block average inlet moisture content of less than or equal to 30 percent (by weight, dry basis); AND operate with a 24-hour block average inlet dryer temperature of less than or equal to 600 °F.
(2) Hardwood veneer dryers	Process less than 30 volume percent softwood species on an annual basis.
(3) Softwood veneer dryers	Minimize fugitive emissions from the dryer doors through (proper maintenance procedures) and the green end of the dryers (through proper balancing of the heated zone exhausts).
(4) Veneer redryers	Process veneer that has been previously dried, such that the 24-hour block average inlet moisture content of the veneer is less than or equal to 25 percent (by weight, dry basis).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292.

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**Table 4 to Subpart DDDD of Part 63—Requirements for Performance Tests**

<b>For . . .</b>	<b>You must . . .</b>	<b>Using . . .</b>
(1) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	select sampling port's location and the number of traverse ports	Method 1 or 1A of 40 CFR part 60, appendix A (as appropriate).
(2) each process unit subject to a compliance option in table 1A	determine velocity and volumetric flow	Method 2 in addition to Method 2A, 2C, 2D, 2F, or 2G in appendix A to 40 CFR

or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	rate	part 60 (as appropriate).
(3) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	conduct gas molecular weight analysis	Method 3, 3A, or 3B in appendix A to 40 CFR part 60 (as appropriate).
(4) each process unit subject to a compliance option in table 1A or 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	measure moisture content of the stack gas	Method 4 in appendix A to 40 CFR part 60; OR Method 320 in appendix A to 40 CFR part 63; OR ASTM D6348-03 (IBR, see §63.14(b)).
(5) each process unit subject to a compliance option in table 1B to this subpart for which you choose to demonstrate compliance using a total HAP as THC compliance option	measure emissions of total HAP as THC	Method 25A in appendix A to 40 CFR part 60. You may measure emissions of methane using EPA Method 18 in appendix A to 40 CFR part 60 and subtract the methane emissions from the emissions of total HAP as THC.
(6) each process unit subject to a compliance option in table 1A to this subpart; OR for each process unit used in calculation of an emissions average under §63.2240(c)	measure emissions of total HAP (as defined in §63.2292)	Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see §63.14(f)); OR the NCASI Method ISS/FP-A105.01 (IBR, see §63.14(f)); OR ASTM D6348-03 (IBR, see §63.14(b)) provided that percent R as determined in Annex A5 of ASTM D6348-03 is equal or greater than 70 percent and less than or equal to 130 percent.
(7) each process unit subject to a compliance option in table 1B to this subpart for which you choose to demonstrate compliance using a methanol compliance option	measure emissions of methanol	Method 308 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method CI/WP-98.01 (IBR, see §63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see §63.14(f)); OR the NCASI Method ISS/FP-A105.01 (IBR, see §63.14(f)).
(8) each process unit subject to a compliance option in table 1B to this subpart for which you choose to demonstrate compliance using a	measure emissions of formaldehyde	Method 316 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR Method 0011 in “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods”

formaldehyde compliance option		(EPA Publication No. SW-846) for formaldehyde; OR the NCASI Method CI/WP-98.01 (IBR, see §63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see §63.14(f)); OR the NCASI Method ISS/FP-A105.01 (IBR, see §63.14(f)).
(9) each reconstituted wood product press at a new or existing affected source or reconstituted wood product board cooler at a new affected source subject to a compliance option in table 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	meet the design specifications included in the definition of wood products enclosure in §63.2292; or determine the percent capture efficiency of the enclosure directing emissions to an add-on control device	Methods 204 and 204A through 204F of 40 CFR part 51, appendix M, to determine capture efficiency (except for wood products enclosures as defined in §63.2292). Enclosures that meet the definition of wood products enclosure or that meet Method 204 requirements for a permanent total enclosure (PTE) are assumed to have a capture efficiency of 100 percent. Enclosures that do not meet either the PTE requirements or design criteria for a wood products enclosure must determine the capture efficiency by constructing a TTE according to the requirements of Method 204 and applying Methods 204A through 204F (as appropriate). As an alternative to Methods 204 and 204A through 204F, you may use the tracer gas method contained in appendix A to this subpart.
(10) each reconstituted wood product press at a new or existing affected source or reconstituted wood product board cooler at a new affected source subject to a compliance option in table 1A to this subpart	determine the percent capture efficiency	a TTE and Methods 204 and 204A through 204F (as appropriate) of 40 CFR part 51, appendix M. As an alternative to installing a TTE and using Methods 204 and 204A through 204F, you may use the tracer gas method contained in appendix A to this subpart. Enclosures that meet the design criteria (1) through (4) in the definition of wood products enclosure, or that meet Method 204 requirements for a PTE (except for the criteria specified in section 6.2 of Method 204) are assumed to have a capture efficiency of 100 percent. Measured emissions divided by the capture efficiency provides the emission rate.

(11) each process unit subject to a compliance option in tables 1A and 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	establish the site-specific operating requirements (including the parameter limits or THC concentration limits) in table 2 to this subpart	data from the parameter monitoring system or THC CEMS and the applicable performance test method(s).
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[71 FR 8373, Feb. 16, 2006]

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**Table 5 to Subpart DDDD of Part 63—Performance Testing and Initial Compliance Demonstrations for the Compliance Options and Operating Requirements**

<b>For each . . .</b>	<b>For the following compliance options and operating requirements . . .</b>	<b>You have demonstrated initial compliance if . . .</b>
(1) Process unit listed in Table 1A to this subpart	Meet the production-based compliance options listed in Table 1A to this subpart	The average total HAP emissions measured using the methods in Table 4 to this subpart over the 3-hour performance test are no greater than the compliance option in Table 1A to this subpart; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed the compliance option value.
(2) Process unit listed in Table 1B to this subpart	Reduce emissions of total HAP, measured as THC, by 90 percent	Total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(3) Process unit listed in Table 1B to this subpart	Limit emissions of total HAP, measured as THC, to 20 ppmvd	The average total HAP emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 20 ppmvd; AND you have a record of the operating requirement(s) listed in

		Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 20 ppmvd.
(4) Process unit listed in Table 1B to this subpart	Reduce methanol or formaldehyde emissions by 90 percent	The methanol or formaldehyde emissions measured using the methods in Table 4 to this subpart over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in §63.2262; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions were reduced by at least 90 percent.
(5) Process unit listed in Table 1B to this subpart	Limit methanol or formaldehyde emissions to less than or equal to 1 ppmvd (if uncontrolled emissions are greater than or equal to 10 ppmvd)	The average methanol or formaldehyde emissions, measured using the methods in Table 4 to this subpart over the 3-hour performance test, do not exceed 1 ppmvd; AND you have a record of the operating requirement(s) listed in Table 2 to this subpart for the process unit over the performance test during which emissions did not exceed 1 ppmvd. If the process unit is a reconstituted wood product press or a reconstituted wood product board cooler, your capture device either meets the EPA Method 204 criteria for a PTE or achieves a capture efficiency of greater than or equal to 95 percent.
(6) Reconstituted wood product press at a new or existing affected source, or reconstituted wood product board cooler at a new affected source	Compliance options in Tables 1A and 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	You submit the results of capture efficiency verification using the methods in Table 4 to this subpart with your Notification of Compliance Status.
(7) Process unit listed in Table 1B to this subpart controlled by routing exhaust to a combustion unit	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	You submit with your Notification of Compliance Status documentation showing that the process exhausts controlled enter into the flame zone of your combustion unit.
(8) Process unit listed in Table 1B to this subpart using a wet control device as the sole means	Compliance options in Table 1B to this subpart or the emissions averaging compliance	You submit with your Notification of Compliance Status your plan to address how organic HAP captured in the wastewater from the wet control device is contained or

of reducing HAP emissions	option in §63.2240(c)	destroyed to minimize re-release to the atmosphere.
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**Table 6 to Subpart DDDD of Part 63—Initial Compliance Demonstrations for Work Practice Requirements**

<b>For each . . .</b>	<b>For the following work practice requirements . . .</b>	<b>You have demonstrated initial compliance if . . .</b>
(1) Dry rotary dryer	Process furnish with an inlet moisture content less than or equal to 30 percent (by weight, dry basis) AND operate with an inlet dryer temperature of less than or equal to 600 °F	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that the dryer meets the criteria of a “dry rotary dryer” AND you have a record of the inlet moisture content and inlet dryer temperature (as required in §63.2263).
(2) Hardwood veneer dryer	Process less than 30 volume percent softwood species	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that the dryer meets the criteria of a “hardwood veneer dryer” AND you have a record of the percentage of softwoods processed in the dryer (as required in §63.2264).
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	You meet the work practice requirement AND you submit with the Notification of Compliance Status a copy of your plan for minimizing fugitive emissions from the veneer dryer heated zones (as required in §63.2265).
(4) Veneer redryers	Process veneer with an inlet moisture content of less than or equal to 25 percent (by weight, dry basis)	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that the dryer operates only as a redryer AND you have a record of the veneer inlet moisture content of the veneer processed in the redryer (as required in §63.2266).
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	You meet the work practice requirement AND you submit a signed statement with the Notification of Compliance Status that you are using non-HAP coatings AND you have a record showing that you are using non-HAP coatings.



**Table 7 to Subpart DDDD of Part 63—Continuous Compliance With the Compliance Options and Operating Requirements**

<b>For . . .</b>	<b>For the following compliance options and operating requirements . . .</b>	<b>You must demonstrate continuous compliance by . . .</b>
(1) Each process unit listed in Table 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c) and the operating requirements in Table 2 to this subpart based on monitoring of operating parameters	Collecting and recording the operating parameter monitoring system data listed in Table 2 to this subpart for the process unit according to §§63.2269(a) through (b) and 63.2270; AND reducing the operating parameter monitoring system data to the specified averages in units of the applicable requirement according to calculations in §63.2270; AND maintaining the average operating parameter at or above the minimum, at or below the maximum, or within the range (whichever applies) established according to §63.2262.
(2) Each process unit listed in Tables 1A and 1B to this subpart or used in calculation of an emissions average under §63.2240(c)	Compliance options in Tables 1A and 1B to this subpart or the emissions averaging compliance option in §63.2240(c) and the operating requirements in Table 2 of this subpart based on THC CEMS data	Collecting and recording the THC monitoring data listed in Table 2 to this subpart for the process unit according to §63.2269(d); AND reducing the CEMS data to 3-hour block averages according to calculations in §63.2269(d); AND maintaining the 3-hour block average THC concentration in the exhaust gases less than or equal to the THC concentration established according to §63.2262.
(3) Each process unit using a biofilter	Compliance options in Tables 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	Conducting a repeat performance test using the applicable method(s) specified in Table 4 to this subpart within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media.

(4) Each process unit using a catalytic oxidizer	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	Checking the activity level of a representative sample of the catalyst at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range.
(5) Each process unit listed in Table 1A to this subpart, or each process unit without a control device used in calculation of an emissions averaging debit under §63.2240(c)	Compliance options in Table 1A to this subpart or the emissions averaging compliance option in §63.2240(c) and the operating requirements in Table 2 to this subpart based on monitoring of process unit controlling operating parameters	Collecting and recording on a daily basis process unit controlling operating parameter data; AND maintaining the operating parameter at or above the minimum, at or below the maximum, or within the range (whichever applies) established according to §63.2262.
(6) Each Process unit listed in Table 1B to this subpart using a wet control device as the sole means of reducing HAP emissions	Compliance options in Table 1B to this subpart or the emissions averaging compliance option in §63.2240(c)	Implementing your plan to address how organic HAP captured in the wastewater from the wet control device is contained or destroyed to minimize re-release to the atmosphere.

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**Table 8 to Subpart DDDD of Part 63—Continuous Compliance With the Work Practice Requirements**

<b>For . . .</b>	<b>For the following work practice requirements . . .</b>	<b>You must demonstrate continuous compliance by . . .</b>
(1) Dry rotary dryer	Process furnish with an inlet moisture content less than or equal to 30 percent (by weight, dry basis) AND operate with an inlet dryer temperature of less than or equal to 600 °F	Maintaining the 24-hour block average inlet furnish moisture content at less than or equal to 30 percent (by weight, dry basis) AND maintaining the 24-hour block average inlet dryer temperature at less than or equal to 600 °F; AND keeping records of the inlet temperature of furnish moisture content and inlet dryer temperature.
(2) Hardwood veneer dryer	Process less than 30 volume percent softwood species	Maintaining the volume percent softwood species processed below 30 percent AND keeping records of the volume percent softwood species processed.
(3) Softwood veneer dryer	Minimize fugitive emissions from the dryer doors and the green end	Following (and documenting that you are following) your plan for minimizing fugitive emissions.

(4) Veneer redryers	Process veneer with an inlet moisture content of less than or equal to 25 percent (by weight, dry basis)	Maintaining the 24-hour block average inlet moisture content of the veneer processed at or below of less than or 25 percent AND keeping records of the inlet moisture content of the veneer processed.
(5) Group 1 miscellaneous coating operations	Use non-HAP coatings as defined in §63.2292	Continuing to use non-HAP coatings AND keeping records showing that you are using non-HAP coatings.

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**Table 9 to Subpart DDDD of Part 63—Requirements for Reports**

<b>You must submit a(n) . . .</b>	<b>The report must contain . . .</b>	<b>You must submit the report . . .</b>
(1) Compliance report	The information in §63.2281(c) through (g)	Semiannually according to the requirements in §63.2281(b).
(2) immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your SSMP	(i) Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	(ii) The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority.

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**Table 10 to Subpart DDDD of Part 63—Applicability of General Provisions to Subpart DDDD**

<b>Citation</b>	<b>Subject</b>	<b>Brief description</b>	<b>Applies to subpart DDDD</b>
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes.
§63.2	Definitions	Definitions for part 63 standards	Yes.

§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities	Prohibited activities; compliance date; circumvention, fragmentation	Yes.
§63.5	Construction/Reconstruction	Applicability; applications; approvals	Yes.
§63.6(a)	Applicability	GP apply unless compliance extension; GP apply to area sources that become major	Yes.
§63.6(b)(1)-(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for section 112(f)	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance Dates for New and Reconstructed Area Sources that Become Major	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	Yes.
§63.6(c)(1)-(2)	Compliance Dates for Existing Sources	Comply according to date in subpart, which must be no later than 3 years after effective date; for section 112(f) standards, comply within 90 days of effective date unless compliance extension	Yes.
§63.6(c)(3)-(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in subpart or by equivalent time period ( <i>e.g.</i> , 3 years)	Yes.
§63.6(d)	[Reserved]		
§63.6(e)(1)-(2)	Operation & Maintenance	Operate to minimize emissions at all times; correct malfunctions as soon as practicable; operation and maintenance requirements	Yes.

		independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan (SSMP)	Requirement for SSM and SSMP; content of SSMP	Yes.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	Yes.
§63.6(f)(2)-(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)-(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§63.6(h)(1)-(9)	Opacity/Visible Emission (VE) Standards	Requirements for opacity and visible emission standards	NA.
§63.6(i)(1)-(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(i)(15)	[Reserved]		
§63.6(i)(16)	Compliance Extension	Compliance extension and Administrator's authority	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt source category from requirement to comply with rule	Yes.
§63.7(a)(1)-(2)	Performance Test Dates	Dates for conducting initial performance testing and other compliance demonstrations; must conduct 180 days after first subject to rule	Yes.
§63.7(a)(3)	Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§63.7(b)(2)	Notification of Rescheduling	If have to reschedule performance test, must notify Administrator as soon as practicable	Yes.

§63.7(c)	Quality Assurance/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
§63.7(e)(1)	Conditions for Conducting Performance Tests	Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM; not a violation to exceed standard during SSM	Yes.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to rule and EPA test methods unless Administrator approves alternative	Yes.
§63.7(e)(3)	Test Run Duration	Must have three test runs for at least the time specified in the relevant standard; compliance is based on arithmetic mean of three runs; specifies conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an alternative test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years	Yes.
§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance specifications in appendix B of part 60 apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring with Flares	Requirements for flares in §63.11 apply	NA.

§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)-(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each effluent before it is combined and before it is released to the atmosphere unless Administrator approves otherwise; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with and good air pollution control practices	Yes.
§63.8(c)(1)(i)	Operation and Maintenance of CMS	Must maintain and operate CMS in accordance with §63.6(e)(1)	Yes.
§63.8(c)(1)(ii)	Spare Parts for CMS	Must maintain spare parts for routine CMS repairs	Yes.
§63.8(c)(1)(iii)	SSMP for CMS	Must develop and implement SSMP for CMS	Yes.
§63.8(c)(2)-(3)	Monitoring System Installation	Must install to get representative emission of parameter measurements; must verify operational status before or at performance test	Yes.
§63.8(c)(4)	Continuous Monitoring System (CMS) Requirements	CMS must be operating except during breakdown, out-of-control, repair, maintenance, and high-level calibration drifts; COMS must have a minimum of one cycle of sampling and analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period; CEMS must have a minimum of one cycle of operation for each successive 15-minute period	Yes.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) Minimum Procedures	COMS minimum procedures	NA.
§63.8(c)(6)-(8)	CMS Requirements	Zero and high-level calibration check	Yes.

		requirements; out-of-control periods	
§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years. Keep old versions for 5 years after revisions	Yes.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	Yes.
§63.8(f)(1)-(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	Yes.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for CEMS	Yes.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that can't be used in average; rounding of data	Yes.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)-(2)	Initial Notifications	Submit notification 120 days after effective date; contents of notification	Yes.
§63.9(b)(3)	[Reserved]		
§63.9(b)(4)-(5)	Initial Notifications	Submit notification 120 days after effective date; notification of intent to construct/reconstruct; notification of commencement of construct/reconstruct; notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology/lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Source	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance	Notify EPA Administrator 60 days	Yes.



	Test	prior	
§63.9(f)	Notification of Visible Emissions/Opacity Test	Notify EPA Administrator 30 days prior	No.
§63.9(g)	Additional Notifications When Using CMS	Notification of performance evaluation; notification using COMS data; notification that exceeded criterion for relative accuracy	Yes.
§63.9(h)(1)-(6)	Notification of Compliance Status	Contents; due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change in when notifications must be submitted	Yes.
§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General Requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)-(iv)	Records Related to Startup, Shutdown, and Malfunction	Occurrence of each of operation (process equipment); occurrence of each malfunction of air pollution equipment; maintenance on air pollution control equipment; actions during startup, shutdown, and malfunction	Yes.
§63.10(b)(2)(vi) and (x)-(xi)	CMS Records	Malfunctions, inoperative, out-of-control	Yes.
§63.10(b)(2)(vii)-(ix)	Records	Measurements to demonstrate compliance with compliance options and operating requirements; performance test, performance evaluation, and visible emission observation results; measurements to	Yes.

		determine conditions of performance tests and performance evaluations	
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10(b)(2)(xiv)	Records	All documentation supporting initial notification and notification of compliance status	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes.
§63.10(c)(1)-(6), (9)-(15)	Records	Additional records for CMS	Yes.
§63.10(c)(7)-(8)	Records	Records of excess emissions and parameter monitoring exceedances for CMS	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.
§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	NA.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Contents and submission	Yes.
§63.10(e)(1)-(2)	Additional CMS Reports	Must report results for each CEM on a unit; written copy of performance evaluation; 3 copies of COMS performance evaluation	Yes.
§63.10(e)(3)	Reports	Excess emission reports	No.
§63.10(e)(4)	Reporting COMS data	Must submit COMS data with performance test data	NA.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for EPA Administrator to waive	Yes.
§63.11	Flares	Requirements for flares	NA.
§63.12	Delegation	State authority to enforce standards	Yes.

§63.13	Addresses	Addresses where reports, notifications, and requests are send	Yes.
§63.14	Incorporation by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes.

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## **Appendix A to Subpart DDDD of Part 63—Alternative Procedure To Determine Capture Efficiency From Enclosures Around Hot Presses in the Plywood and Composite Wood Products Industry Using Sulfur Hexafluoride Tracer Gas**

### 1.0 SCOPE AND APPLICATION

This procedure has been developed specifically for the rule for the plywood and composite wood products (PCWP) industry and is used to determine the capture efficiency of a partial hot press enclosure in that industry. This procedure is applicable for the determination of capture efficiency for enclosures around hot presses and is an alternative to the construction of temporary total enclosures (TTE). Sulfur hexafluoride (SF<sub>6</sub>) is used as a tracer gas (other tracer gases may be used if approved by the EPA Administrator). This gas is not indigenous to the ambient atmosphere and is nonreactive.

This procedure uses infrared spectrometry (IR) as the analytical technique. When the infrared spectrometer used is a Fourier-Transform Infrared spectrometer (FTIR), an alternate instrument calibration procedure may be used; the alternate calibration procedure is the calibration transfer standard (CTS) procedure of EPA Method 320 (appendix A to 40 CFR part 63). Other analytical techniques which are capable of equivalent Method Performance (Section 13.0) also may be used. Specifically, gas chromatography with electron capture detection (GC/ECD) is an applicable technique for analysis of SF<sub>6</sub>.

### 2.0 SUMMARY OF METHOD

A constant mass flow rate of SF<sub>6</sub> tracer gas is released through manifolds at multiple locations within the enclosure to mimic the release of hazardous air pollutants during the press process. This test method requires a minimum of three SF<sub>6</sub> injection points (two at the press unloader and one at the press) and provides details about considerations for locating the injection points. A GC/ECD is used to measure the concentration of SF<sub>6</sub> at the inlet duct to the control device (outlet duct from enclosure). Simultaneously, EPA Method 2 (appendix A to 40 CFR part 60) is used to measure the flow rate at the inlet duct to the control device. The concentration and flow rate measurements are used to calculate the mass emission rate of SF<sub>6</sub> at the control device inlet. Through calculation of the mass of SF<sub>6</sub> released through the manifolds and the mass of SF<sub>6</sub> measured at the inlet to the control device, the capture efficiency of the enclosure is calculated.

In addition, optional samples of the ambient air may be taken at locations around the perimeter of the enclosure to quantify the ambient concentration of SF<sub>6</sub> and to identify those areas of the enclosure that may be performing less efficiently; these samples would be taken using disposable syringes and would be analyzed using a GC/ECD.

Finally, in addition to the requirements specified in this procedure, the data quality objectives (DQO) or lower confidence limit (LCL) criteria specified in appendix A to 40 CFR part 63, subpart KK, Data Quality Objective and Lower Confidence Limit Approaches for Alternative Capture Efficiency Protocols and Test Methods, must also be satisfied. A minimum of three test runs are required for this procedure; however, additional test runs may be required based on the results of the DQO or LCL analysis.

### 3.0 DEFINITIONS

3.1 Capture efficiency (CE). The weight per unit time of SF<sub>6</sub> entering the control device divided by the weight per unit time of SF<sub>6</sub> released through manifolds at multiple locations within the enclosure.

3.2 Control device (CD). The equipment used to reduce, by destruction or removal, press exhaust air pollutants prior to discharge to the ambient air.

3.3 Control/destruction efficiency (DE). The volatile organic compound or HAP removal efficiency of the control device.

3.4 Data Quality Objective (DQO) Approach. A statistical procedure to determine the precision of the data from a test series and to qualify the data in the determination of capture efficiency for compliance purposes. If the results of the DQO analysis of the initial three test runs do not satisfy the DQO criterion, the LCL approach can be used or additional test runs must be conducted. If additional test runs are conducted, then the DQO or LCL analysis is conducted using the data from both the initial test runs and all additional test runs.

3.5 Lower Confidence Limit (LCL) Approach. An alternative statistical procedure that can be used to qualify data in the determination of capture efficiency for compliance purposes. If the results of the LCL approach produce a CE that is too low for demonstrating compliance, then additional test runs must be conducted until the LCL or DQO is met. As with the DQO, data from all valid test runs must be used in the calculation.

3.6 Minimum Measurement Level (MML). The minimum tracer gas concentration expected to be measured during the test series. This value is selected by the tester based on the capabilities of the IR spectrometer (or GC/ECD) and the other known or measured parameters of the hot press enclosure to be tested. The selected MML must be above the low-level calibration standard and preferably below the mid-level calibration standard.

3.7 Method 204. The U.S. EPA Method 204, "Criteria For and Verification of a Permanent or Temporary Total Enclosure" (40 CFR part 51, appendix M).

3.8 Method 205. The U.S. EPA Method 205, "Verification of Gas Dilution Systems for Field Instrument Calibrations" (40 CFR part 51, appendix M).

3.9 Method 320. The U.S. EPA Method 320, "Measurement of Vapor Phase Organic and Inorganic Emissions by Extractive Fourier Transform Infrared (FTIR) Spectroscopy" (40 CFR part 63, appendix A).

3.10 Overall capture and control efficiency (CCE). The collection and control/destruction efficiency of both the PPE and CD combined. The CCE is calculated as the product of the CE and DE.

3.11 Partial press enclosure (PPE). The physical barrier that "partially" encloses the press equipment, captures a significant amount of the associated emissions, and transports those emissions to the CD.

3.12 Test series. A minimum of three test runs or, when more than three runs are conducted, all of the test runs conducted.

### 4.0 INTERFERENCES

There are no known interferences.

## 5.0 SAFETY

Sulfur hexafluoride is a colorless, odorless, nonflammable liquefied gas. It is stable and nonreactive and, because it is noncorrosive, most structural materials are compatible with it. The Occupational Safety and Health Administration Permissible Emission Limit-Time Weighted Average (PEL-TWA) and Threshold Limit Value-Time Weighted Average (TLV-TWA) concentrations are 1,000 parts per million. Sulfur hexafluoride is an asphyxiant. Exposure to an oxygen-deficient atmosphere (less than 19.5 percent oxygen) may cause dizziness, drowsiness, nausea, vomiting, excess salivation, diminished mental alertness, loss of consciousness, and death. Exposure to atmospheres containing less than 12 percent oxygen will bring about unconsciousness without warning and so quickly that the individuals cannot help themselves. Contact with liquid or cold vapor may cause frostbite. Avoid breathing sulfur hexafluoride gas. Self-contained breathing apparatus may be required by rescue workers. Sulfur hexafluoride is not listed as a carcinogen or a potential carcinogen.

## 6.0 EQUIPMENT AND SUPPLIES

This method requires equipment and supplies for: (a) the injection of tracer gas into the enclosure, (b) the measurement of the tracer gas concentration in the exhaust gas entering the control device, and (c) the measurement of the volumetric flow rate of the exhaust gas entering the control device. In addition, the requisite equipment needed for EPA Methods 1-4 in appendix A to 40 CFR part 60 will be required. Equipment and supplies for optional ambient air sampling are discussed in Section 8.6.

### 6.1 Tracer Gas Injection.

6.1.1 Manifolds. This method requires the use of tracer gas supply cylinder(s) along with the appropriate flow control elements. Figure 1 shows a schematic drawing of the injection system showing potential locations for the tracer gas manifolds. Figure 2 shows a schematic drawing of the recommended configuration of the injection manifold. Three tracer gas discharge manifolds are required at a minimum.

6.1.2 Flow Control Meter. Flow control and measurement meter for measuring the quantity of tracer gas injected. A mass flow, volumetric flow, or critical orifice control meter can be used for this method. The meter must be accurate to within  $\pm 5$  percent at the flow rate used. This means that the flow meter must be calibrated against a primary standard for flow measurement at the appropriate flow rate.

### 6.2 Measurement of Tracer Gas Concentration.

6.2.1 Sampling Probes. Use Pyrex or stainless steel sampling probes of sufficient length to reach the traverse points calculated according to EPA Method 1 (appendix A to 40 CFR part 60).

6.2.2 Sampling Line. Use a heated Teflon sampling line to transport the sample to the analytical instrument.

6.2.3 Sampling Pump. Use a sampling pump capable of extracting sufficient sample from the duct and transporting to the analytical instrument.

6.2.4 Sample Conditioning System. Use a particulate filter sufficient to protect the sampling pump and analytical instrument. At the discretion of the tester and depending on the equipment used and the moisture content of the exhaust gas, it may be necessary to further condition the sample by removing moisture using a condenser.

6.2.5 Analytical Instrument. Use one of the following analytical instruments.

6.2.5.1 Spectrometer. Use an infrared spectrometer designed to measuring SF<sub>6</sub> tracer gas and capable of meeting or exceeding the specifications of this procedure. An FTIR meeting the specifications of Method 320 in appendix A to 40 CFR part 63 may be used.

6.2.5.2 GC/ECD. Use a GC/ECD designed to measure SF<sub>6</sub> tracer gas and capable of meeting or exceeding the specifications of this procedure.

6.2.6 Recorder. At a minimum, use a recorder with linear strip chart. An automated data acquisition system (DAS) is recommended.

6.3 Exhaust Gas Flow Rate Measurement. Use equipment specified for EPA Methods 2, 3, and 4 in appendix A to 40 CFR part 60 for measuring flow rate of exhaust gas at the inlet to the control device.

## 7.0 REAGENTS AND STANDARDS

7.1 Tracer Gas. Use SF<sub>6</sub> as the tracer gas. The manufacturer of the SF<sub>6</sub> tracer gas should provide a recommended shelf life for the tracer gas cylinder over which the concentration does not change more than ±2 percent from the certified value. A gas mixture of SF<sub>6</sub> diluted with nitrogen should be used; based on experience and calculations, pure SF<sub>6</sub> gas is not necessary to conduct tracer gas testing. Select a concentration and flow rate that is appropriate for the analytical instrument's detection limit, the MML, and the exhaust gas flow rate from the enclosure (see section 8.1.1). You may use a tracer gas other than SF<sub>6</sub> with the prior approval of the EPA Administrator. If you use an approved tracer gas other than SF<sub>6</sub>, all references to SF<sub>6</sub> in this protocol instead refer to the approved tracer gas.

7.2 Calibration Gases. The SF<sub>6</sub> calibration gases required will be dependent on the selected MML and the appropriate span selected for the test. Commercial cylinder gases certified by the manufacturer to be accurate to within 1 percent of the certified label value are preferable, although cylinder gases certified by the manufacturer to 2 percent accuracy are allowed. Additionally, the manufacturer of the SF<sub>6</sub> calibration gases should provide a recommended shelf life for each calibration gas cylinder over which the concentration does not change more than ±2 percent from the certified value. Another option allowed by this method is for the tester to obtain high concentration certified cylinder gases and then use a dilution system meeting the requirements of EPA Method 205, 40 CFR part 51, appendix M, to make multi-level calibration gas standards. Low-level, mid-level, and high-level calibration gases will be required. The MML must be above the low-level standard, the high-level standard must be no more than four times the low-level standard, and the mid-level standard must be approximately halfway between the high- and low-level standards. See section 12.1 for an example calculation of this procedure.

NOTE: If using an FTIR as the analytical instrument, the tester has the option of following the CTS procedures of Method 320 in appendix A to 40 CFR part 63; the calibration standards (and procedures) specified in Method 320 may be used in lieu of the calibration standards and procedures in this protocol.

7.2.1 Zero Gas. High purity nitrogen.

7.2.2 Low-Level Calibration Gas. An SF<sub>6</sub> calibration gas in nitrogen with a concentration equivalent to 20 to 30 percent of the applicable span value.

7.2.3 Mid-Level Calibration Gas. An SF<sub>6</sub> calibration gas in nitrogen with a concentration equivalent to 45 to 55 percent of the applicable span value.

7.2.4 High-Level Calibration Gas. An SF<sub>6</sub> calibration gas in nitrogen with a concentration equivalent to 80 to 90 percent of the applicable span value.

## 8.0 SAMPLE COLLECTION, PRESERVATION, STORAGE, AND TRANSPORT

## 8.1 Test Design.

### 8.1.1 Determination of Minimum Tracer Gas Flow Rate.

8.1.1.1 Determine (via design calculations or measurements) the approximate flow rate of the exhaust gas through the enclosure, actual cubic feet per minute (acfm).

8.1.1.2 Calculate the minimum tracer gas injection rate necessary to assure a detectable SF<sub>6</sub> concentration at the exhaust gas measurement point (see section 12.1 for calculation).

8.1.1.3 Select a flow meter for the injection system with an operating range appropriate for the injection rate selected.

### 8.1.2 Determination of the Approximate Time to Reach Equilibrium.

8.1.2.1 Determine the volume of the enclosure.

8.1.2.2 Calculate the air changes per minute of the enclosure by dividing the approximate exhaust flow rate (8.1.1.1 above) by the enclosed volume (8.1.2.1 above).

8.1.2.3 Calculate the time at which the tracer concentration in the enclosure will achieve approximate equilibrium. Divide 3 by the air changes per minute (8.1.2.2 above) to establish this time. This is the approximate length of time for the system to come to equilibrium. Concentration equilibrium occurs when the tracer concentration in the enclosure stops changing as a function of time for a constant tracer release rate. Because the press is continuously cycling, equilibrium may be exhibited by a repeating, but stable, cyclic pattern rather than a single constant concentration value. Assure sufficient tracer gas is available to allow the system to come to equilibrium, and to sample for a minimum of 20 minutes and repeat the procedure for a minimum of three test runs. Additional test runs may be required based on the results of the DQO and LCL analyses described in 40 CFR part 63, subpart KK, appendix A.

8.1.3 Location of Injection Points. This method requires a minimum of three tracer gas injection points. The injection points should be located within leak prone, volatile organic compound/hazardous air pollutant (VOC/HAP) producing areas around the press, or horizontally within 12 inches of the defined equipment. One potential configuration of the injection points is depicted in Figure 1. The effect of wind, exfiltration through the building envelope, and air flowing through open building doors should be considered when locating tracer gas injection points within the enclosure. The injection points should also be located at a vertical elevation equal to the VOC/HAP generating zones. The injection points should not be located beneath obstructions that would prevent a natural dispersion of the gas. Document the selected injection points in a drawing(s).

8.1.4 Location of Flow Measurement and Tracer Sampling. Accurate CD inlet gas flow rate measurements are critical to the success of this procedure. Select a measurement location meeting the criteria of EPA Method 1 (40 CFR part 60, appendix A), Sampling and Velocity Traverses for Stationary Sources. Also, when selecting the measurement location, consider whether stratification of the tracer gas is likely at the location (*e.g.*, do not select a location immediately after a point of air in-leakage to the duct).

8.2 Tracer Gas Release. Release the tracer gas at a calculated flow rate (see section 12.1 for calculation) through a minimum of three injection manifolds located as described above in 8.1.3. The tracer gas delivery lines must be routed into the enclosure and attached to the manifolds without violating the integrity of the enclosure.

## 8.3 Pretest Measurements.

8.3.1 Location of Sampling Point(s). If stratification is not suspected at the measurement location, select a single sample point located at the centroid of the CD inlet duct or at a point no closer to the CD inlet duct walls than 1 meter. If stratification is suspected, establish a "measurement line" that passes through the centroidal area and in the direction of any expected stratification. Locate three traverse points at 16.7, 50.0 and 83.3 percent of the measurement line and sample from each of these three points during each run, or follow the procedure in section 8.3.2 to verify whether stratification does or does not exist.

8.3.2 Stratification Verification. The presence or absence of stratification can be verified by using the following procedure. While the facility is operating normally, initiate tracer gas release into the enclosure. For rectangular ducts, locate at least nine sample points in the cross section such that the sample points are the centroids of similarly-shaped, equal area divisions of the cross section. Measure the tracer gas concentration at each point. Calculate the mean value for all sample points. For circular ducts, conduct a 12-point traverse (*i.e.*, six points on each of the two perpendicular diameters) locating the sample points as described in 40 CFR part 60, appendix A, Method 1. Perform the measurements and calculations as described above. Determine if the mean pollutant concentration is more than 10 percent different from any single point. If so, the cross section is considered to be stratified, and the tester may not use a single sample point location, but must use the three traverse points at 16.7, 50.0, and 83.3 percent of the entire measurement line. Other traverse points may be selected, provided that they can be shown to the satisfaction of the Administrator to provide a representative sample over the stack or duct cross section.

8.4 CD Inlet Gas Flow Rate Measurements. The procedures of EPA Methods 1-4 (40 CFR part 60, appendix A) are used to determine the CD inlet gas flow rate. Molecular weight (Method 3) and moisture (Method 4) determinations are only required once for each test series. However, if the test series is not completed within 24 hours, then the molecular weight and moisture measurements should be repeated daily. As a minimum, velocity measurements are conducted according to the procedures of Methods 1 and 2 before and after each test run, as close to the start and end of the run as practicable. A velocity measurement between two runs satisfies both the criterion of "after" the run just completed and "before" the run to be initiated. Accurate exhaust gas flow rate measurements are critical to the success of this procedure. If significant temporal variations of flow rate are anticipated during the test run under normal process operating conditions, take appropriate steps to accurately measure the flow rate during the test. Examples of steps that might be taken include: (1) conducting additional velocity traverses during the test run; or (2) continuously monitoring a single point of average velocity during the run and using these data, in conjunction with the pre- and post-test traverses, to calculate an average velocity for the test run.

## 8.5 Tracer Gas Measurement Procedure.

8.5.1 Calibration Error Test. Immediately prior to the emission test (within 2 hours of the start of the test), introduce zero gas and high-level calibration gas at the calibration valve assembly. Zero and calibrate the analyzer according to the manufacturer's procedures using, respectively, nitrogen and the calibration gases. Calculate the predicted response for the low-level and mid-level gases based on a linear response line between the zero and high-level response. Then introduce the low-level and mid-level calibration gases successively to the measurement system. Record the analyzer responses for the low-level and mid-level calibration gases and determine the differences between the measurement system responses and the predicted responses using the equation in section 12.3. These differences must be less than 5 percent of the respective calibration gas value. If not, the measurement system must be replaced or repaired prior to testing. No adjustments to the measurement system shall be conducted after the calibration and before the drift determination (section 8.5.4). If adjustments are necessary before the completion of the test series, perform the drift checks prior to the required adjustments and repeat the calibration following the adjustments. If multiple electronic ranges are to be used, each additional range must be checked with a mid-level calibration gas to verify the multiplication factor.



NOTE: If using an FTIR for the analytical instrument, you may choose to follow the pretest preparation, evaluation, and calibration procedures of Method 320 (section 8.0) (40 CFR part 63, appendix A) in lieu of the above procedure.

8.5.2 Response Time Test. Conduct this test once prior to each test series. Introduce zero gas into the measurement system at the calibration valve assembly. When the system output has stabilized, switch quickly to the high-level calibration gas. Record the time from the concentration change to the measurement system response equivalent to 95 percent of the step change. Repeat the test three times and average the results.

8.5.3 SF<sub>6</sub> Measurement. Sampling of the enclosure exhaust gas at the inlet to the CD should begin at the onset of tracer gas release. If necessary, adjust the tracer gas injection rate such that the measured tracer gas concentration at the CD inlet is within the spectrometer's calibration range (*i.e.*, between the MML and the span value). Once the tracer gas concentration reaches equilibrium, the SF<sub>6</sub> concentration should be measured using the infrared spectrometer continuously for at least 20 minutes per run. Continuously record (*i.e.*, record at least once per minute) the concentration. Conduct at least three test runs. On the recording chart, in the data acquisition system, or in a log book, make a note of periods of process interruption or cyclic operation such as the cycles of the hot press operation. Table 1 to this appendix summarizes the physical measurements required for the enclosure testing.

NOTE: If a GC/ECD is used as the analytical instrument, a continuous record (at least once per minute) likely will not be possible; make a minimum of five injections during each test run. Also, the minimum test run duration criterion of 20 minutes applies.

8.5.4 Drift Determination. Immediately following the completion of the test run, reintroduce the zero and mid-level calibration gases, one at a time, to the measurement system at the calibration valve assembly. (Make no adjustments to the measurement system until both the zero and calibration drift checks are made.) Record the analyzer responses for the zero and mid-level calibration gases and determine the difference between the instrument responses for each gas prior to and after the emission test run using the equation in section 12.4. If the drift values exceed the specified limits (section 13), invalidate the test results preceding the check and repeat the test following corrections to the measurement system. Alternatively, recalibrate the test measurement system as in section 8.5.1 and report the results using both sets of calibration data (*i.e.*, data determined prior to the test period and data determined following the test period). Note: If using an FTIR for the analytical instrument, you may choose to follow the post-test calibration procedures of Method 320 in appendix A to 40 CFR part 63 (section 8.11.2) in lieu of the above procedures.

8.6 Ambient Air Sampling (Optional). Sampling the ambient air surrounding the enclosure is optional. However, taking these samples during the capture efficiency testing will identify those areas of the enclosure that may be performing less efficiently.

8.6.1 Location of Ambient Samples Outside the Enclosure (Optional). In selecting the sampling locations for collecting samples of the ambient air surrounding the enclosure, consider potential leak points, the direction of the release, and laminar flow characteristics in the area surrounding the enclosure. Samples should be collected from all sides of the enclosure, downstream in the prevailing room air flow, and in the operating personnel occupancy areas.

8.6.2 Collection of Ambient Samples (Optional). During the tracer gas release, collect ambient samples from the area surrounding the enclosure perimeter at predetermined location using disposable syringes or some other type of containers that are non-absorbent, inert, and that have low permeability (*i.e.*, polyvinyl fluoride film or polyester film sample bags or polyethylene, polypropylene, nylon or glass bottles). The use of disposable syringes allows samples to be injected directly into a gas chromatograph. Concentration measurements taken around the perimeter of the enclosure provide evidence of capture performance and will assist in the identification of those areas of the enclosure that are performing less efficiently.

8.6.3 Analysis and Storage of Ambient Samples (Optional). Analyze the ambient samples using an analytical instrument calibrated and operated according to the procedures in this appendix or ASTM E 260 and ASTM E 697. Samples may be analyzed immediately after a sample is taken, or they may be stored for future analysis. Experience has shown no degradation of concentration in polypropylene syringes when stored for several months as long as the needle or syringe is plugged. Polypropylene syringes should be discarded after one use to eliminate the possibility of cross contamination of samples.

## 9.0 QUALITY CONTROL

9.1 Sampling, System Leak Check. A sampling system leak check should be conducted prior to and after each test run to ensure the integrity of the sampling system.

9.2 Zero and Calibration Drift Tests.

Section	Quality control measure	Effect
8.5.4	Zero and calibration drift tests	Ensures that bias introduced by drift in the measurement system output during the run is no greater than 3 percent of span.

## 10.0 CALIBRATION AND STANDARDIZATION

10.1 Control Device Inlet Air Flow Rate Measurement Equipment. Follow the equipment calibration requirements specified in Methods 2, 3, and 4 (appendix A to 40 CFR part 60) for measuring the velocity, molecular weight, and moisture of the control device inlet air.

10.2 Tracer Gas Injection Rate. A dry gas volume flow meter, mass flow meter, or orifice can be used to measure the tracer gas injection flow rate. The selected flow measurement device must have an accuracy of greater than  $\pm 5$  percent at the field operating range. Prior to the test, verify the calibration of the selected flow measurement device using either a wet test meter, spirometer, or liquid displacement meter as the calibration device. Select a minimum of two flow rates to bracket the expected field operating range of the flow meter. Conduct three calibration runs at each of the two selected flow rates. For each run, note the exact quantity of gas as determined by the calibration standard and the gas volume indicated by the flow meter. For each flow rate, calculate the average percent difference of the indicated flow compared to the calibration standard.

10.3 Spectrometer. Follow the calibration requirements specified by the equipment manufacturer for infrared spectrometer measurements and conduct the pretest calibration error test specified in section 8.5.1. Note: if using an FTIR analytical instrument see Method 320, section 10 (appendix A to 40 CFR part 63).

10.4 Gas Chromatograph. Follow the pre-test calibration requirements specified in section 8.5.1.

10.5 Gas Chromatograph for Ambient Sampling (Optional). For the optional ambient sampling, follow the calibration requirements specified in section 8.5.1 or ASTM E 260 and E 697 and by the equipment manufacturer for gas chromatograph measurements.

## 11.0 ANALYTICAL PROCEDURES

The sample collection and analysis are concurrent for this method (see section 8.0).

## 12.0 CALCULATIONS AND DATA ANALYSIS

12.1 Estimate MML and Span. The MML is the minimum measurement level. The selection of this level is at the discretion of the tester. However, the MML must be higher than the low-level calibration standard, and the tester must be able to measure at this level with a precision of  $\leq 10$  percent. As an example, select the MML as 10 times the instrument's published detection limit. The detection limit of one instrument is 0.01 parts per million by volume (ppmv). Therefore, the MML would be 0.10 ppmv. Select the low-level calibration standard as 0.08 ppmv. The high-level standard would be four times the low-level standard or 0.32 ppmv. A reasonable mid-level standard would then be 0.20 ppmv (halfway between the low-level standard and the high-level standard). Finally, the span value would be approximately 0.40 ppmv (the high-level value is 80 percent of the span). In this example, the following MML, calibration standards, and span values would apply:

MML = 0.10 ppmv

Low-level standard = 0.08 ppmv

Mid-level standard = 0.20 ppmv

High-level standard = 0.32 ppmv

Span value = 0.40 ppmv

12.2 Estimate Tracer Gas Injection Rate for the Given Span. To estimate the minimum and maximum tracer gas injection rate, assume a worst case capture efficiency of 80 percent, and calculate the tracer gas flow rate based on known or measured parameters. To estimate the minimum tracer gas injection rate, assume that the MML concentration (10 times the IR detection limit in this example) is desired at the measurement location. The following equation can be used to estimate the minimum tracer gas injection rate:

$$((Q_{T-MIN} \times 0.8)/Q_E) \times (C_T \div 100) \times 10^6 = \text{MML}$$

$$Q_{T-MIN} = 1.25 \times \text{MML} \times (Q_E/C_T) \times 10^{-4}$$

Where:

$Q_{T-MIN}$  = minimum volumetric flow rate of tracer gas injected, standard cubic feet per minute (scfm);

$Q_E$  = volumetric flow rate of exhaust gas, scfm;

$C_T$  = Tracer gas ( $SF_6$ ) concentration in gas blend, percent by volume;

MML = minimum measured level, ppmv =  $10 \times IR_{DL}$  (for this example);

$IR_{DL}$  = IR detection limit, ppmv.

Standard conditions: 20 °C, 760 millimeters of mercury (mm Hg).

To estimate the maximum tracer gas injection rate, assume that the span value is desired at the measurement location. The following equation can be used to estimate the maximum tracer gas injection rate:

$$((Q_{T-MAX} \times 0.8)/Q_E) \times (C_T \div 100) \times 10^6 = \text{span value}$$

$$Q_{T-MAX} = 1.25 \times \text{span value} \times (Q_E/C_T) \times 10^{-4}$$

Where:

$Q_{T-MAX}$  = maximum volumetric flow rate of tracer gas injected, scfm;

Span value = instrument span value, ppmv.

The following example illustrates this calculation procedure:

Find the range of volumetric flow rate of tracer gas to be injected when the following parameters are known:

$Q_E$  = 60,000 scfm (typical exhaust gas flow rate from an enclosure);

$C_T$  = 2 percent SF<sub>6</sub> in nitrogen;

$IR_{DL}$  = 0.01 ppmv (per manufacturer's specifications);

MML = 10 ×  $IR_{DL}$  = 0.10 ppmv;

Span value = 0.40 ppmv;

$Q_T$  = ?

Minimum tracer gas volumetric flow rate:

$$Q_{T-MIN} = 1.25 \times MML \times (Q_E/C_T) \times 10^{-4}$$

$$Q_{T-MIN} = 1.25 \times 0.10 \times (60,000/2) \times 10^{-4} = 0.375 \text{ scfm}$$

Maximum tracer gas volumetric flow rate:

$$Q_{T-MAX} = 1.25 \times \text{span value} \times (Q_E/C_T) \times 10^{-4}$$

$$Q_{T-MAX} = 1.25 \times 0.40 \times (60,000/2) \times 10^{-4} = 1.5 \text{ scfm}$$

In this example, the estimated total volumetric flow rate of the two percent SF<sub>6</sub> tracer gas injected through the manifolds in the enclosure lies between 0.375 and 1.5 scfm.

12.3 Calibration Error. Calculate the calibration error for the low-level and mid-level calibration gases using the following equation:

$$\text{Err} = |C_{std} - C_{meas}| \div C_{std} \times 100$$

Where:

Err = calibration error, percent;

$C_{std}$  = low-level or mid-level calibration gas value, ppmv;

$C_{meas}$  = measured response to low-level or mid-level concentration gas, ppmv.

12.4 Calibration Drift. Calculate the calibration drift for the zero and low-level calibration gases using the following equation:

$$D = ||C_{initial} - C_{final} || \div C_{span} \times 100$$

Where:

D = calibration drift, percent;

C<sub>initial</sub> = low-level or mid-level calibration gas value measured before test run, ppmv;

C<sub>final</sub> = low-level or mid-level calibration gas value measured after test run, ppmv;

C<sub>span</sub> = span value, ppmv.

12.5 Calculate Capture Efficiency. The equation to calculate enclosure capture efficiency is provided below:

$$CE = (SF_{6-CD} \div SF_{6-INJ}) \times 100$$

Where:

CE = capture efficiency;

SF<sub>6-CD</sub> = mass of SF<sub>6</sub> measured at the inlet to the CD;

SF<sub>6-INJ</sub> = mass of SF<sub>6</sub> injected from the tracer source into the enclosure.

Calculate the CE for each of the initial three test runs. Then follow the procedures outlined in section 12.6 to calculate the overall capture efficiency.

12.6 Calculate Overall Capture Efficiency. After calculating the capture efficiency for each of the initial three test runs, follow the procedures in 40 CFR part 63, subpart KK, appendix A, to determine if the results of the testing can be used in determining compliance with the requirements of the rule. There are two methods that can be used: the DQO and LCL methods. The DQO method is described in section 3 of 40 CFR part 63, subpart KK, appendix A, and provides a measure of the precision of the capture efficiency testing conducted. Section 3 of 40 CFR part 63, subpart KK, appendix A, provides an example calculation using results from a facility. If the DQO criteria are met using the first set of three test runs, then the facility can use the average capture efficiency of these test results to determine the capture efficiency of the enclosure. If the DQO criteria are not met, then the facility can conduct another set of three runs and run the DQO analysis again using the results from the six runs *OR* the facility can elect to use the LCL approach.

The LCL method is described in section 4 of 40 CFR part 63, subpart KK, appendix A, and provides sources that may be performing much better than their regulatory requirement, a screening option by which they can demonstrate compliance. The LCL approach compares the 80 percent lower confidence limit for the mean measured CE value to the applicable regulatory requirement. If the LCL capture efficiency is higher than the applicable limit, then the facility is in initial compliance and would use the LCL capture efficiency as the capture efficiency to determine compliance. If the LCL capture efficiency is lower than the applicable limit, then the facility must perform additional test runs and re-run the DQO or LCL analysis.

## 13.0 METHOD PERFORMANCE

### 13.1 Measurement System Performance Specifications.

13.1.1 Zero Drift. Less than ±3 percent of the span value.

13.1.2 Calibration Drift. Less than ±3 percent of the span value.

13.1.3 Calibration Error. Less than ±5 percent of the calibration gas value.

13.2 Flow Measurement Specifications. The mass flow, volumetric flow, or critical orifice control meter used should have an accuracy of greater than  $\pm 5$  percent at the flow rate used.

13.3 Calibration and Tracer Gas Specifications. The manufacturer of the calibration and tracer gases should provide a recommended shelf life for each calibration gas cylinder over which the concentration does not change more than  $\pm 2$  percent from the certified value.

14.0 POLLUTION PREVENTION [RESERVED]

15.0 Waste Management [Reserved]

16.0 References

1. 40 CFR part 60, appendix A, EPA Method 1—Sample and velocity traverses for stationary sources.

2. 40 CFR part 60, appendix A, EPA Method 2—Determination of stack gas velocity and volumetric flow rate.

3. 40 CFR part 60, appendix A, EPA Method 3—Gas analysis for the determination of dry molecular weight.

4. 40 CFR part 60, appendix A, EPA Method 4—Determination of moisture content in stack gases.

5. SEMI F15-93 Test Method for Enclosures Using Sulfur Hexafluoride Tracer Gas and Gas Chromatography.

6. Memorandum from John S. Seitz, Director, Office of Air Quality Planning and Standards, to EPA Regional Directors, Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions, February 7, 1995. (That memorandum contains an attached technical document from Candace Sorrell, Emission Monitoring and Analysis Division, "Guidelines for Determining Capture Efficiency," January 9, 1994).

7. Technical Systems Audit of Testing at Plant "C," EPA-454/R-00-26, May 2000.

8. Material Safety Data Sheet for SF<sub>6</sub>, Air Products and Chemicals, Inc. Website: [www3.airproducts.com](http://www3.airproducts.com). October 2001.

17.0 TABLES, DIAGRAMS, FLOWCHARTS, AND VALIDATION DATA

**TABLE 1 TO APPENDIX A—SUMMARY OF CRITICAL PHYSICAL MEASUREMENTS FOR ENCLOSURE TESTING**

<b>Measurement</b>	<b>Measurement instrumentation</b>	<b>Measurement frequency</b>	<b>Measurement site</b>
Tracer gas injection rate	Mass flow meter, volumetric flow meter or critical orifice	Continuous	Injection manifolds (cylinder gas).
Tracer gas concentration at control device inlet	Infrared Spectrometer or GC/ECD	Continuous (at least one reading per minute) for a minimum of 20 minutes	Inlet duct to the control device (outlet duct of enclosure).

Volumetric air flow rate	EPA Methods 1, 2, 3, 4 (40 CFR part 60, appendix A) <ul style="list-style-type: none"> <li>• Velocity sensor (Manometer/Pitot tube)</li> <li>• Thermocouple</li> </ul>	Each test run for velocity (minimum); Daily for moisture and molecular weight	Inlet duct to the control device (outlet duct of enclosure).
	<ul style="list-style-type: none"> <li>• Midget Impinger sampler</li> </ul>		
	<ul style="list-style-type: none"> <li>• Orsat or Fyrite</li> </ul>		

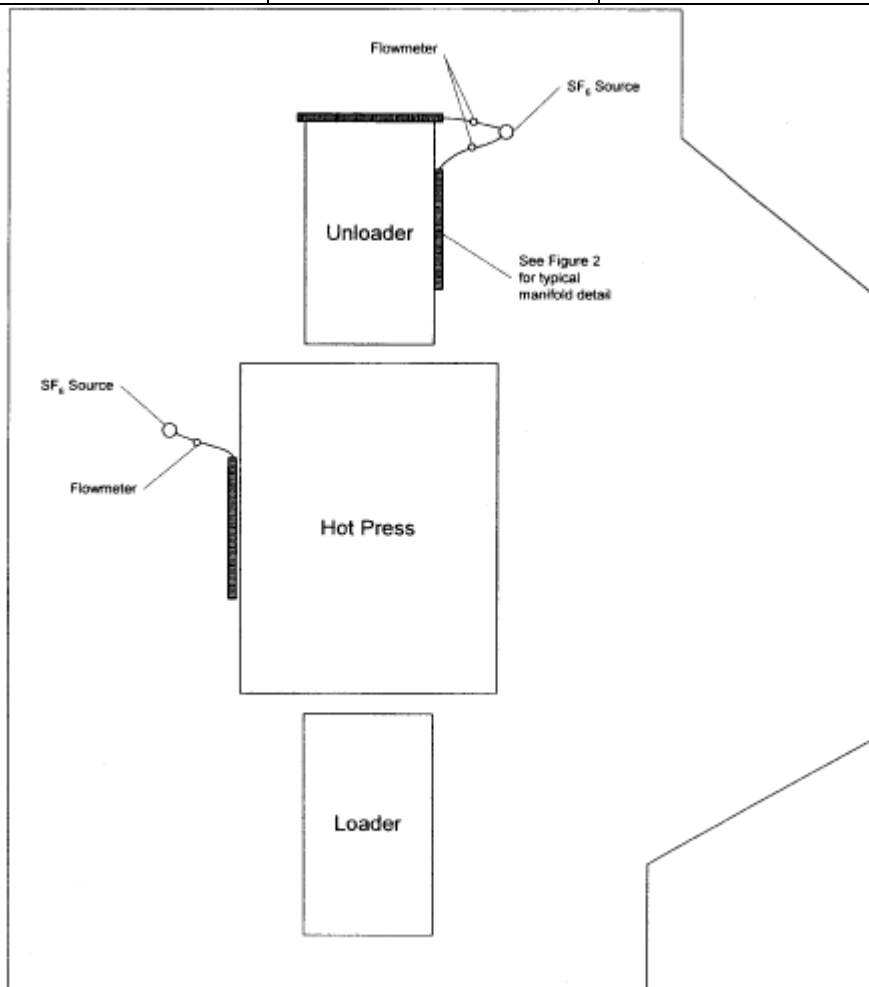
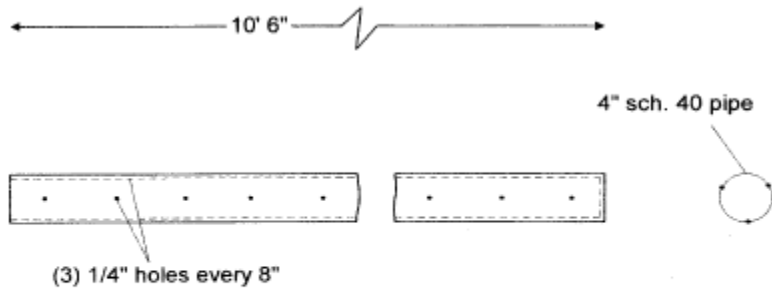


Figure 1. Plan view schematic of hot press and enclosure showing SF<sub>6</sub> manifold locations.

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**Elevation**

Figure 2. Schematic detail for manifold system for SF<sub>6</sub> injection.

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[69 FR 46011, July 30, 2004, as amended at 71 FR 8375, Feb. 16, 2006]

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**CERTIFICATE OF SERVICE**

I, Cynthia Hook, hereby certify that a copy of this permit has been mailed by first class mail to Caddo River LLC, 229 South Spur 8, Glenwood, AR, 71943, on this 29<sup>th</sup> day of January, 2018.

Rhonda Bowler  
Rhonda Bowler, Administrative Analyst  
Office of Air Quality