



# United States Environmental Protection Agency General Air Quality Permit for New or Modified Minor Sources of Air Pollution in Indian Country

<http://www.epa.gov/air/tribal/tribalnsr.html>

## General Air Quality Permit for New or Modified Minor Source Sawmill Facilities in Indian Country

Last Modified: July 1, 2016

Version 1.0

### Information about this General Permit:

#### *Applicability*

Pursuant to the provisions of the Clean Air Act (CAA), Subchapter I, part D and 40 CFR part 49, subpart C, this permit authorizes the construction or modification and the operation of the sawmill facilities for which a reviewing authority issues an Approval of the Request for Coverage (permitted source).

#### *Eligibility*

To be eligible for coverage under this General Permit, the permitted source must qualify as a minor source as defined in 40 CFR 49.152.

#### *Request for Coverage*

Requirements for submitting a Request for Coverage are contained in Section 7 of this General Permit.

#### *Incorporation of Documents*

The information contained in each reviewing authority's Approval of the Request for Coverage is hereby incorporated into this General Permit.

#### *Termination*

Section 6 of this General Permit addresses a reviewing authority's ability to revise, revoke and reissue, or terminate this General Permit. It also addresses the reviewing authority's ability to terminate an individual permitted source's Approval of the Request for Coverage under this General Permit.

#### *Definitions*

The terms used herein shall have the meaning as defined in 40 CFR 49.152, unless otherwise defined in Attachment B of this permit. If a term is not defined, it shall be interpreted in accordance with normal business use.

## Permit Terms and Conditions

The following applies to each permittee and permitted source with respect to only the affected emissions units and any associated air pollution control equipment listed in that permitted source's Approval of the Request for Coverage.

### Section 1: General Provisions

1. *Construction and Operation*

The permittee shall construct or modify and shall operate the affected emissions units and any associated air pollution control technologies in compliance with this permit and all other applicable federal air quality regulations; and in a manner consistent with representations made by the permittee in the Request for Coverage, to the extent the reviewing authority relies upon these representations in issuing the Approval of the Request for Coverage.

2. *Location*

This permit only authorizes the permittee to construct or modify and to operate the permitted source in the location listed in the reviewing authority's Approval of the Request for Coverage for that permitted source.

3. *Liability*

This permit does not release the permittee from any liability for compliance with other applicable federal and tribal environmental laws and regulations, including the CAA.

4. *Severability*

The provisions of this permit are severable. If any portion of this permit is held invalid, the remaining terms and conditions of this permit shall remain valid and in force.

5. *Compliance*

The permittee must comply with all provisions of this permit, including those set forth in the attachments and emission limitations that apply to the affected emissions units at the permitted source. Noncompliance with any permit provision is a violation of the permit and may constitute a violation of the CAA; is grounds for an enforcement action; and is grounds for the reviewing authority to revoke the Approval of the Request for Coverage and terminate the permitted source's coverage under this General Permit.

6. *National Ambient Air Quality Standards (NAAQS)/Prevention of Significant Deterioration (PSD) Protection*

The permitted source must not cause or contribute to a NAAQS violation or, in an attainment area, must not cause or contribute to a PSD increment violation.

7. *Unavailable Defense*

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

8. *Property Rights*

The permit does not convey any property rights of any sort or any exclusive privilege.

9. *Information Requests*

You, as the permittee, shall furnish to the reviewing authority, within 30 days, unless another timeframe is specified by the EPA, any information that the reviewing authority may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating coverage under the permit or to determine compliance with the permit. For any such information claimed to be confidential, the permittee must submit a claim of confidentiality in accordance with 40 CFR part 2, subpart B.

10. *Inspection and Entry*

Upon presentation of proper credentials, the permittee must allow a representative of the reviewing authority to:

- a. Enter upon the premises where a permitted source is located or emissions-related activity is conducted or where records are required to be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
- c. Inspect, during normal business hours or while the permitted source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit;
- d. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- e. Record any inspection by use of written, electronic, magnetic and photographic media.

11. *Posting of Coverage*

The most current Approval of the Request for Coverage for the permitted source must be posted prominently at the facility, and each affected emissions unit and any associated air pollution control technology must be labeled with the identification number listed in the Approval of the Request for Coverage for that permitted source.

12. *Duty to Obtain Source-specific Permit*

If the reviewing authority intends to terminate a permitted source's coverage under this General Permit for cause as provided in Section 6 of this General Permit, then the permittee shall apply for and obtain a source-specific permit as required by the reviewing authority.

13. *Credible Evidence*

For the purpose of establishing whether the permittee violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a permitted source would have been in compliance with applicable requirements if the permittee had performed the appropriate performance or compliance test or procedure.

**Section 2: Emission Limitations and Standards**

14. The permittee shall install, maintain and operate each affected emission unit, including any associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions of NSR regulated pollutants and considering the manufacturer's recommended operating procedures at all times, including periods of startup, shutdown, maintenance and malfunction. The reviewing authority will determine whether the permittee is using acceptable operating and maintenance procedures based on information available to the reviewing authority which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the permitted source.

15. Open burning at the permitted source is prohibited. The burning and combustion of wood or lumber products shall only occur within wood-fired boilers.
16. Each affected emissions unit and source of fugitive emissions shall not cause to be discharged into the atmosphere any gases that exhibit 20 percent opacity or greater averaged over any consecutive six-minute period.
17. Liquid fuels shall contain no more than 0.0015 percent sulfur by weight.
18. Except in serious particulate matter (PM<sub>10</sub>) nonattainment areas and PM<sub>2.5</sub> nonattainment areas, the throughput of wood logs entering the sawmilling operation shall not exceed 175,000 tons per year based on a 12-month rolling total. The 12-month rolling total is determined by the sum of the current month's throughput and the previous 11-month's throughput.
19. If located in a serious PM<sub>10</sub> nonattainment area or a PM<sub>2.5</sub> nonattainment area, the throughput of wood logs entering the sawmilling operation at the permitted source shall not exceed 110,000 tons per year based on a 12-month rolling total. The 12-month rolling total is determined by the sum of the current month's throughput and the previous 11-month's throughput.
20. If located in an ozone attainment, unclassifiable, or attainment/unclassifiable area or marginal, moderate, or serious ozone nonattainment area, the combined maximum heat input capacity for all boilers, excluding auxiliary heaters firing liquid or gaseous fuels, shall be less than 30 million British thermal units/hour (MMBtu/hr).
21. If located in an ozone attainment, unclassifiable, or attainment/unclassifiable area or marginal, moderate, or serious ozone nonattainment areas, the combined maximum heat input capacity of auxiliary heaters burning liquid or gaseous fuels shall be less than 10 MMBtu/hr. Any auxiliary heaters using solid fuel must comply with the limit in Condition 20.
22. If located in a severe or extreme ozone nonattainment area:
  - a. The combined maximum heat input capacity for all boilers shall be less than 50 MMBtu/hr in a severe area and less than 20 MMBtu/hr in an extreme area.
  - b. Only natural gas may be used as a fuel in boilers and auxiliary heaters.
23. Volatile organic compound (VOC) emissions from all lumber drying kilns, and surface coating operations shall not exceed:
  - a. 80 tons per year based on a 12-month rolling total in an ozone attainment, unclassifiable, or attainment/unclassifiable area;
  - b. 80 tons per year based on a 12-month rolling total in a marginal or moderate ozone nonattainment area;
  - c. 40 tons per year based on a 12-month rolling total in a serious ozone nonattainment area;
  - d. 20 tons per year based on a 12-month rolling total in a severe ozone nonattainment area; and
  - e. 8 tons per year based on a 12-month rolling total in an extreme ozone nonattainment area.

24. If the Approval of Request for Coverage specifies the permitted source is subject to this condition, Condition 24, then:
- a. Emissions of total hazardous air pollutants (HAPs) from all lumber drying kilns, and surface coating operations shall not exceed 17.5 tons per year based on a 12-month rolling total; and
  - b. Emissions of a single HAP from all lumber drying kilns, and surface coating operations shall not exceed 8 tons per year based on a 12-month rolling total.

Permitted sources subject to this condition may comply with either Condition 24.a or 24.b. Only permitted sources that use only natural gas in their non-emergency engines may choose to comply with this limit. The Approval of Request for Coverage shall specify as to whether the permitted source is subject to Condition 24.a or 24.b.

25. Planer mill operations shall be conducted within enclosed structures. A baghouse or fabric filter shall be used to control emissions to the atmosphere.
26. Sawmill operations conducted outdoors shall, at a minimum, be covered and all drop points shall be controlled using a cyclone or baghouse/fabric filter during all times when the affected emission units operate.
27. Sawmill operations conducted indoors shall control emissions to the atmosphere using a baghouse or fabric filter.
28. The combined maximum engine power of all emergency generator engines at the permitted source shall be below 1,000 horsepower (hp) in attainment areas, 500 hp in ozone nonattainment areas classified marginal, moderate, or serious, or there shall be no emergency generator engines in severe or extreme ozone nonattainment areas. All emergency engines must be emergency generator engines.
29. The permittee shall comply with the fugitive dust control plan in Attachment C.
30. All VOC-containing material (e.g., coatings, thinners, and clean-up solvents) shall be stored in closed containers.
31. All waste materials containing VOC (e.g., soiled rags) shall be stored in sealed containers until properly disposed.

### **Section 3: Monitoring and Testing Requirements**

#### **32. *Inspect Baghouse/Fabric Filter***

At least once during each calendar week in which the permitted source operates, the permittee shall inspect the interior and exterior of each baghouse/fabric filter for evidence of leaks, damage, and missing bags, and take appropriate corrective actions before resuming operations. A supply of extra bags and other spare parts for the baghouse/fabric filter shall be maintained onsite.

#### **33. *Inspect Cyclone***

At least once during each calendar month in which the permitted source operates, the permittee shall perform a visual inspection of each cyclone for evidence of leaking or damage, and take appropriate corrective actions before resuming operations.

34. *Visible Emissions Survey*

At least once during each calendar week in which the permitted source operates, the permittee shall perform a visible emissions survey of all affected emissions units subject to the opacity limit in Condition 16. The survey shall be performed during daylight hours by an individual trained in EPA Method 22 while the source is in operation. If visible emissions are detected during the survey, the permittee shall either:

- a. Take corrective action so that within 24 hours no visible emissions are detected from any emission units while they are in operation; or
- b. Demonstrate compliance with the opacity limit at all units that discharged visible emissions during the survey using EPA Method 9 by an individual trained and certified in Method 9.

35. *Fugitive Emissions Survey*

At least once during each calendar week in which the permitted source operates, the permittee shall survey the facility for visible fugitive emissions. If fugitive emissions are detected crossing the property line the permittee shall take corrective actions according to the attached fugitive dust control plan.

36. *Initial Performance Test for Fugitive Emissions*

Within 60 days after achieving the maximum production rate at which the permitted source will operate the affected emissions unit(s), but not later than 180 days after the first day of operation after the Approval of the Request for Coverage is issued by the reviewing authority, the permittee shall perform an initial performance test to verify compliance with the applicable opacity limitations in Condition 16. Performance tests shall be performed:

- a. According to an EPA-approved test plan;
- b. While the permitted source is operating under typical operating conditions;
- c. Using test Method 9 from 40 CFR part 60, Appendix A with the following modifications:
  - i. The observer shall stand at least 15 feet from the emission source;
  - ii. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources; and
  - iii. Water used for wet suppression shall not be confused with particulate matter emissions and is not to be considered a visible emission (when a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible); and
- d. The duration of each Method 9 test shall be at least 30 minutes. Compliance with each opacity limit shall be determined based on the average of at least five six-minute averages.

37. *Additional Performance Test(s)*

Ongoing performance tests meeting the criteria of the initial performance test in Condition 33 shall be performed:

- a. When required by the reviewing authority; and
- b. At least every five years.

#### **Section 4: Recordkeeping Requirements**

38. The permittee shall maintain all records required to be kept onsite by this permit for at least five years from the date of origin, unless otherwise stated.

39. The permit application and all documentation supporting that application shall be maintained by the permittee for the duration of time the affected emissions unit(s) is/are covered under this permit.

40. The permittee shall maintain records of the following:
- For each combustion unit, monthly fuel usage in million standard cubic feet (MMscf), gallons or tons, as applicable;
  - For each kiln, the daily kiln temperature based on an hourly average;
  - For each kiln and each wood species, monthly throughput in thousand board feet (MBF);
  - Wood log throughput on a monthly basis in tons and each month's 12-month rolling total;
  - The type (tree species) and amount (MBF) of each wood processed on a monthly basis; and
  - For each coating used in a surface coating operation, the Material Safety Data Sheet, percent VOC, percent HAP, density of the coating, and coating usage (in gallons) on a monthly basis.
41. The permittee shall calculate monthly VOC emissions from the kilns and surface coating operations. Monthly VOC emissions shall be used to calculate the 12-month rolling total of VOC emissions. The 12-month rolling total is the sum of emissions from the current month and the emissions from the previous 11 months. The permittee shall calculate the monthly VOC emissions as described below and in Attachment D.
- Monthly VOC emissions from kilns shall be determined based on the table shown below. If a species is not listed below, the permittee shall use the emission factors for Western White Pine, as shown in the table below, and use the temperature dependent factor that corresponds to the drying kiln's temperature capability.

Species	Maximum Kiln Temperature °F	WPP1 VOC <sup>1</sup> (pounds (lbs)/MBF)
<b>Non-Resinous Softwood Species</b>		
White Fir <sup>2</sup>	≤200	0.8388
	>200	1.0902
Western Hemlock	≤200	0.5253
	>200	0.6615
Western Red Cedar	≤200	0.3631
	>200	1.1453
<b>Resinous Softwood Species (Non-Pine Family)</b>		
Douglas Fir	≤200	1.1576
	>200	1.6969
Engelmann Spruce	≤200	0.1775
	>200	0.2161
Larch	≤200	1.1576
	>200	1.6969
<b>Resinous Softwood Species (Pine Family)</b>		
Lodgepole Pine	≤200	1.5293
	>200	1.5293
Ponderosa Pine	≤200	2.3450
	>200	3.8087
Western White Pine	≤200	2.8505
	>200	3.8087

<sup>1</sup> VOC emissions approximated consistent with EPA's Interim VOC Measurement Protocol for the Wood Products Industry - July 2007 (WPP1 VOC), <http://www.epa.gov/ttnemc01/prelim/otm26.pdf>. WPP1 VOC underestimates emissions when the mass-to-carbon ratio of unidentified VOC exceeds that of propane. Ethanol and acetic acid are examples of compounds that contribute to lumber drying VOC emissions (for some species more than others), and both have mass-to-carbon ratios exceeding that of propane.

Species	Maximum Kiln Temperature °F	WPP1 VOC <sup>1</sup> (pounds (lbs)/MBF)
<sup>2</sup> White fir in this context refers to a common name for a mixture of several species of true fir grown in the western U.S. This mixture includes the following species: white fir, grand fir, noble fir and subalpine fir.		

- b. Monthly VOC emissions from surface coating operations shall be based on a mass balance of the amount of coating used, the density of the coating, and the percent VOC of the coating.

42. If the permitted source is subject to Condition 24, the permittee shall calculate monthly HAP emissions from the kilns and surface coating operations. Monthly HAP emissions shall be used to calculate the 12-month rolling total of HAP emissions. The 12-month rolling total is the sum of emissions from the current month and the emissions from the previous 11 months. The permittee shall calculate the monthly HAP emissions as described below and in Attachment D.s

- a. Monthly HAP emissions from kilns shall be determined based on the table shown below. If a species is not listed below, the permittee shall use the emission factors for Western White Pine, as shown in the table below, and use the temperature dependent factor that corresponds to the drying kiln's temperature capability.

Species	Maximum Kiln Temperature °F	Highest Single HAP (methanol, lb/MBF)	Total HAPs (lb/MBF)
Non-Resinous Softwood Species			
White Fir <sup>2</sup>	≤200	0.1484	0.2107
	>200	0.4200	0.4956
Western Hemlock	≤200	0.1484	0.2921
	>200	0.2195	0.3661
Western Red Cedar	≤200	0.1484	0.2939
	>200	0.4200	0.5784
Resinous Softwood Species (Non-Pine Family)			
Douglas Fir	≤200	0.0690	0.1409
	>200	0.1170	0.1913
Engelmann Spruce	≤200	0.0250	0.064
	>200	0.0780	0.1201
Larch	≤200	0.0690	0.1409
	>200	0.1170	0.1914
Resinous Softwood Species (Pine Family)			
Lodgepole Pine	≤200	0.0628	0.1166
	>200	0.0628	0.1166
Ponderosa Pine	≤200	0.0740	0.1271
	>200	0.1440	0.2029
Western White Pine	≤200	0.0740	0.1271
	>200	0.1440	0.2029
<sup>1</sup> HAP emissions approximated consistent with EPA's Interim VOC Measurement Protocol for the Wood Products Industry - July 2007 (WPP1 VOC), <a href="http://www.epa.gov/ttnemc01/prelim/otm26.pdf">http://www.epa.gov/ttnemc01/prelim/otm26.pdf</a> .			
<sup>2</sup> White fir in this context refers to a common name for a mixture of several species of true fir grown in the western U.S. This mixture includes the following species: white fir, grand fir, noble fir and subalpine fir.			



- b. Monthly HAP emissions from surface coating operations shall be based on a mass balance of the amount of coating used, the density of the coating, and the percent HAP of the coating. The permittee shall determine the highest single HAP and total HAP emissions.
43. The dates and results of all baghouse/fabric filter and cyclone inspections performed pursuant to Conditions 32 and 33, and any corrective actions taken as a result of the required inspections shall be recorded.
44. The dates and results of each visible emissions survey performed pursuant to Condition 34 shall be recorded. At a minimum, records shall include:
- a. The name of the person, company or entity conducting the survey;
  - b. Whether visible emissions were detected from any emission unit;
  - c. Any corrective action taken;
  - d. The result of any corrective action; and
  - e. The results of any Method 9 tests performed.
45. The dates and results of each fugitive emissions survey performed pursuant to Condition 35, any corrective action taken as a result of each survey, and the result of any corrective action taken shall be recorded.
46. The results of each performance test conducted pursuant to Conditions 36 and 37 shall be recorded. At a minimum, the permittee shall maintain records of:
- a. The date of each test;
  - b. Each test plan;
  - c. Any documentation required to approve an alternate test method;
  - d. The results of each test; and
  - e. The name of the company or entity conducting the analysis.

## **Section 5: Notification and Reporting Requirements**

### *47. Notification of Construction or Modification, and Operations*

The permittee shall submit a written or electronic notice to the reviewing authority within 30 days from when the permittee begins actual construction or modification, and within 30 days from when the permittee begins initial operations or resumes operation after a modification.

### *48. Notification of Change in Ownership or Operator*

If the permitted source changes ownership or operator, then the new owner or operator must submit a written or electronic notice to the reviewing authority within 90 days before or after the change in ownership or operator is effective. In the report, the new permittee must provide the reviewing authority a written agreement containing a specific date for transfer of ownership or operator, and an effective date on which the new owner or operator assumes partial and/or full coverage and liability under this permit. The submittal must identify the previous owner or operator, and update the name, street address, mailing address, contact information, and any other information about the source if it would change as a result of the change of ownership or operator. The current owner or operator shall ensure that the permitted source remains in compliance with the General Permit until any such transfer of ownership or operator is effective.

### *49. Notification of Closure*

The permittee must submit a report of any permanent or indefinite closure to the reviewing authority in writing within 90 days after the cessation of all operations at the permitted source. The notification must

identify the owner, the current location, and the last operating location of the permitted source. It is not necessary to submit a report of closure for regular, seasonal closures.

50. *Annual Reports*

The permittee shall submit an annual report on or before March 15 of each year to the reviewing authority. The annual report shall cover the period from January 1 to December 31 of the previous year and shall include:

- a. An evaluation of the permitted source's compliance status with the requirements of Section 2 during the calendar year;
- b. Summaries of the required monitoring, testing and recordkeeping in Sections 3 and 4; and
- c. Summaries of deviation reports submitted pursuant to Condition 51.

51. *Deviation Reports*

The permittee shall promptly report to the reviewing authority any deviations as defined at 40 CFR 71.6(a)(3)(iii)(C) from permit requirements including deviations attributable to upset conditions. Deviation reports shall include:

- d. Identity of the affected emissions unit where the deviation occurred;
- e. Nature of the deviation;
- f. Length of time of the deviation;
- g. Probable cause of the deviation; and
- h. Any corrective actions or preventive measures taken as a result of the deviation to minimize emissions from the deviation and to prevent future deviations.
- i. For the purposes of this permit, *promptly* shall be defined to mean:
  - i. Within 72 hours of discovery for deviations from any opacity or emission limit in Condition 16, 23, or 24; or
  - ii. Within 30 days after the end of the month in which the permittee discovered the deviation for all other deviations.

52. *Performance Test Reports*

The permittee shall submit a test report to the reviewing authority within 45 days after the completion of any required performance test. At a minimum, the test report shall include:

- a. A description of the affected emissions unit and sampling location(s);
- b. The time and date of each test;
- c. A summary of test results, reported in units consistent with the applicable standard;
- d. A description of the test methods and quality assurance procedures used;
- e. A summary of any deviations from the proposed test plan and justification for why the deviation(s) was necessary;
- f. The amount of fuel burned, raw material consumed, and/or product produced, as applicable, during each test run;
- g. Operating parameters of the affected emissions units and control equipment during each test run;
- h. Sample calculations of equations used to determine test results in the appropriate units; and
- i. The name of the company or entity performing the analysis.

53. *Reporting and Notification Address*

The permittee shall send all required reports to the reviewing authority at the mailing address specified in the Approval of the Request for Coverage.

54. *Signature Verifying Truth, Accuracy, and Completeness*

All reports required by this permit shall be signed by a responsible official as to the truth, accuracy, and completeness of the information. The report must state that, based on information and belief formed after reasonable inquiry, the statements and information are true, accurate, and complete. If the permittee discovers that any reports or notification submitted to the reviewing authority contain false, inaccurate, or incomplete information, the permittee shall notify the reviewing authority immediately and correct or amend the report as soon as is practicable.

**Section 6: Changes to this General Permit**

55. *Revising, Reopening, Revoking and Reissuing, or Terminating for Cause*

The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by you, the permittee, for a permit revision, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. This provision also applies to the documents incorporated by reference.

56. *Terminating Coverage under this Permit*

The reviewing authority may terminate a previously issued Approval of the Request for Coverage, and thereby terminate that permittee's authorization to construct or modify, and that permitted source's authorization to operate under this General Permit for cause as defined in Attachment B. The reviewing authority may provide the permittee with notice of the intent to terminate, and delay the effective date of the termination to allow the permittee to obtain a source-specific permit as required by the reviewing authority.

57. *Change in Ownership or Operator*

If the permitted source changes ownership or operator, the reviewing authority may change the Approval of the Request for Coverage to reflect the new ownership or operator in accordance with the administrative amendment provisions in 40 CFR 49.159(f).

58. *Permit Becomes Invalid*

Authority to construct and operate under this permit becomes invalid if the permittee does not commence construction within 18 months after the effective date of the request for coverage under a general permit, if the permittee discontinues construction for a period of 18 months or more, or if the permittee does not complete construction within a reasonable time. The reviewing authority may extend the 18-month period upon a satisfactory showing that an extension is justified, according to 40 CFR 49.156(e)(8).

**Section 7: Obtaining Coverage under this General Permit**

To obtain coverage under this General Permit, an applicant must submit a Request for Coverage to the appropriate reviewing authority for the area in which the permitted source is or will be located (the Request for Coverage Form can be found at: <http://www.epa.gov/air/tribal/tribalnsr.html>). Attachment E contains a list of reviewing authorities and their area of coverage.

## Attachment A: Abbreviations and Acronyms

ASTM	American Society for Testing and Materials
bdt	bone dry ton
CAA	Federal Clean Air Act
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
°F	degrees Fahrenheit
ft <sup>3</sup>	cubic feet
MBF	thousand board feet
MMBtu/hr	million British thermal units per hour
MMscf	million standard cubic feet
MW	megawatt
lbs/MBF	pounds per thousand board feet
lbs/MMBtu	pounds per million British thermal units
NAAQS	National Ambient Air Quality Standards
NSR	new source review
NO <sub>x</sub>	nitrogen oxides, except N <sub>2</sub> O
PM	particulate matter
PSD	Prevention of Significant Deterioration
VOC	volatile organic compounds

## Attachment B: Definitions

*Approval of the Request for Coverage* means a reviewing authority's letter granting an applicant's request for construction or modification, and operation of a true minor source under the terms and conditions of this General Permit.

*Cause* means with respect to the reviewing authority's ability to terminate a permitted source's coverage under a permit that:

1. The permittee is not in compliance with the provisions of this General Permit;
2. The reviewing authority determines that the emissions resulting from the construction or modification of the permitted source significantly contribute to NAAQS violations, which are not adequately addressed by the requirements in this General Permit;
3. The reviewing authority has reason to believe that the permittee obtained Approval of the Request for Coverage by fraud or misrepresentation; or
4. The permittee failed to disclose a material fact required by the Request for Coverage or the regulations applicable to the permitted source of which the applicant had or should have had knowledge at the time the permittee submitted the Request for Coverage.

*Construction* means any physical change or change in the method of operation including fabrication, erection, installation, demolition, or modification of an affected emissions unit that would result in a change of emissions.

*Distillate fuel* means fuel oils, including recycled oils that comply with the specifications for fuel oil numbers 1 and 2, as defined by ASTM 396, or equivalent.

*Emergency engine* means an engine that is operated to provide electrical power or mechanical work during an emergency situation. Examples include engines used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or an engine used to pump water in the case of fire, flood, or other event.

*Emergency generator engine* means an emergency engine designed solely for the purpose of providing electrical power during power outages.

*Lumber kiln* means a thermally insulated chamber used to dry wood.

*Permittee* means the owner or operator of a permitted source.

*Permitted source* means each sawmill facility for which a reviewing authority issues an Approval of the Request for Coverage.

*Planer mill* means a process unit that takes cut and seasoned boards from a sawmill facility and turns them into finished dimensional lumber.

*Request for Coverage* means a permit application that contains all the information required in the standard application form.

*Responsible official* means one of the following:

1. For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making

functions for the corporation, or a duly authorized representative of such person if the representative is directly responsible for the overall operation of the permitted source.

2. For a partnership or sole proprietorship: a general partner or the proprietor, respectively.
3. For a public agency: Either a principal executive officer or ranking elected official, such as a chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

*Sawmill* means a facility that processes logs into lumber. This may include a head saw, a chipper, debarking, hedging, log sawing, sawdust conveying and handling, chip conveying and handling, and other associated units.

*Standard cubic foot* means a measure of the quantity of a gas equal to a cubic foot of volume at a temperature of 68 °F and a pressure of 29.92 inches mercury.

## Attachment C – Fugitive Dust Control Plan

### 1. *Site Roadways and Plant Yard*

- a. The dust on the site roadways/plant yard shall be controlled by applications of water, calcium chloride or other acceptable fugitive dust control compound approved by the reviewing authority. Applications of dust suppressants shall be done as often as necessary to meet all applicable emission limits.
- b. All paved roadways/plant yards shall be swept as needed between applications.
- c. Any material spillage on roads shall be cleaned up immediately.

### 2. *Plant*

- a. The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.
- b. The transfer point from the re-circulating belt to the feed belt shall be equipped with an enclosed chute.

### 3. *Storage Piles*

- a. Stockpiling of all saw dust shall be performed to minimize drop distance and control potential dust problems.
- b. Stockpiles shall be watered on an as needed basis in order to meet the opacity limits. Also, equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day.

### 4. *Truck Traffic*

- a. Vehicles shall be loaded to prevent their contents from dropping, leaking, blowing or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any side board, side panel or tail gate; otherwise, the truck shall be tarped.
- b. A speed limit sign of 15 miles per hour or lower shall be posted on site so that it is visible to truck traffic.

### 5. *Corrective Actions*

If corrective action needs to be taken, the permittee shall consider and use one or more of the following options: adjust the watering and/or sweeping frequencies, reduce drop distances, increase cover, and/or take other actions to reduce fugitive dust emissions.

## Attachment D – Sample VOC and HAP Calculations

### Example 1: Western Hemlock with a Maximum Kiln Temperature Less than or Equal to 200 degrees Fahrenheit

#### Methodology:

- VOC emissions (tons/month) = kiln throughput (MBF/month)\*VOC emission factor (lbs/MBF)\*1 ton/2,000 lbs
- HAP emissions (tons/month) = kiln throughput (MBF/month)\*HAP emission factor (lbs/MBF)\*1 ton/2,000 lbs

#### Sample:

- Assume kiln throughput: 1 MBF/month
- VOC emission factor for western hemlock with kiln firing temperature  $\leq 200^{\circ}$  F, as shown in Condition 41: 0.5253 lbs/MBF
- VOC emissions (tons/month) = 1 MBF/month\*0.5253 lbs/MBF\*(1 tons/2,000 lbs) =  $2.63 \times 10^{-4}$  tons/month
- Single HAP emission factor (Methanol) for western hemlock with kiln firing temperature  $\leq 200^{\circ}$  F, as shown in Condition 42: 0.1484 lbs/MBF
- Total HAP emission factor (Methanol) for western hemlock with kiln firing temperature  $\leq 200^{\circ}$  F, as shown in Condition 42: 0.2921 lbs/MBF
- Highest Single HAP emissions (tons/month) = 1 MBF/month\*0.1484 lbs/MBF\*(1 tons/2,000 lbs) =  $7.42 \times 10^{-5}$  tons/month
- Total HAP emissions (tons/month) = 1 MBF/month\*0.2924 lbs/MBF\*(1 tons/2,000 lbs) =  $1.46 \times 10^{-4}$  tons/month

### Example 2: Coating Emissions

#### Methodology:

- VOC emissions (tons/month) = solvent usage (gallons (gal))\*density (lbs/gal)\*% VOC\*1 ton/2000 lbs
- Single HAP emissions (tons/month) = solvent usage (gal)\*density (lbs/gal)\*% HAP\*1 ton/2000 lbs
- Total HAP emissions (tons/month) = solvent usage (gal)\*density (lbs/gal)\*% HAP\*1 ton/2000 lbs

#### Sample:

- Assume: 5 gal of coating used in a month, coating density of 5 lbs/gal, coating VOC content is 30%, coating highest single HAP is 5%, coating total HAP is 7%
- VOC emissions (tons/month) = 5 gal\*5 lbs/gal\*0.30 VOC\*1 ton/2000 lbs = 0.00375 tons/month
- Single HAP emissions (tons/month) = 5 gal\*5 lbs/gal\*0.05 HAP\*1 ton/2000 lbs = 0.000625 tons/month
- Total HAP emissions (tons/month) = 5 gal\*5 lbs/gal\*0.07 HAP\*1 ton/2000 lbs = 0.000875 tons/month

Note: The permittee is not required to determine HAP emissions from boilers, heaters, or emergency engines. Potential emissions from these units were included in determining the limit applicable for kilns and coating operations. The limit in the permit and the potential emissions from boilers, heaters, and emergency engines ensure the permittee is not a major source of HAP emissions.



**Attachment E – List of the EPA Reviewing Authorities and Areas of Coverage**

<b>EPA Region</b>	<b>Address for Request for Coverage</b>	<b>Address for All Other Notifications and Reports</b>	<b>Area Covered</b>	<b>Phone Number</b>
Region I	EPA New England 5 Post Office Square, Suite 100 Mail Code OEP05-2 Boston, MA 02109-3912	EPA New England 5 Post Office Square, Suite 100 Mail Code OES04-2 Boston, MA 02109-3912	Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont	888- 372-7341, 617-918-1111
Region II	Chief, Air Programs Branch Clean Air and Sustainability Division EPA Region 2 290 Broadway, 25 <sup>th</sup> Floor New York, NY 10007-1866	Chief, Air Compliance Branch Division of Enforcement and Compliance Assistance EPA Region 2 290 Broadway, 21 <sup>st</sup> Floor New York, NY 10007-1866	New Jersey, New York, Puerto Rico, and Virgin Islands	877-251-4575
Region III	Office of Permits and Air Toxics 3AP10 EPA Region 3 1650 Arch Street Philadelphia, PA 19103	Office of Air Enforcement and Compliance Assurance 3AP20 EPA Region 3 1650 Arch Street Philadelphia, PA 19103	Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, and West Virginia	800-438-2474, 215-814-5000
Region IV	Chief, Air Permits Section EPA Region 4 APTMD 61 Forsyth Street Atlanta, GA 30303	Chief, Air & EPCRA Enforcement Branch EPA Region 4 APTMD 61 Forsyth Street, SW Atlanta, GA 30303	Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee	800-241-1754, 404-562-9000
Region V	Air Permits Section Air Programs Branch (AR-18J) EPA Region 5 77 West Jackson Blvd Chicago, Illinois 60604	Air Enforcement and Compliance Assurance Branch (AE-17J) Air and Radiation Division EPA Region 5 77 West Jackson Blvd Chicago, Illinois 60604	Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin	800-621-8431, 312-353-2000
Region VI	Multimedia Planning and Permitting Division EPA Region 6 1445 Ross Avenue (6PD-R) Dallas, TX 75202	Compliance and Enforcement Correspondence: Compliance Assurance and Enforcement Division EPA Region 6 1445 Ross Avenue (6EN) Dallas, TX 75202	Arkansas, Louisiana, New Mexico, Oklahoma, and Texas	800-887-6063, 214-665-2760

<b>EPA Region</b>	<b>Address for Request for Coverage</b>	<b>Address for All Other Notifications and Reports</b>	<b>Area Covered</b>	<b>Phone Number</b>
Region VII	Chief, Air Permitting & Compliance Branch EPA Region 7 11201 Renner Blvd Lenexa, KS 66219	Chief, Air Permitting & Compliance Branch EPA Region 7 11201 Renner Blvd Lenexa, KS 66219	Iowa, Kansas, Missouri, and Nebraska	800-223-0425, 913-551-7003
Region VIII	U.S. Environmental Protection Agency, Region 8 Office of Partnerships and Regulatory Assistance Tribal Air Permitting Program, 8P-AR 1595 Wynkoop Street Denver, Colorado 80202	U.S. Environmental Protection Agency, Region 8 Office of Enforcement, Compliance & Environmental Justice Air Toxics and Technical Enforcement Program, 8ENF-AT 1595 Wynkoop Street Denver, Colorado 80202	Colorado, Montana, North Dakota, South Dakota, Utah, and Wyoming	800-227-8917, 303-312-6312
Region IX	Chief, Permits Office (Air-3) Air Division EPA Region 9 75 Hawthorne St San Francisco, CA 94105	Enforcement Division Director Attn: Air & TRI Section (ENF-2-1) EPA Region 9 75 Hawthorne St San Francisco, CA 94105	American Samoa, Arizona, California, Guam, Hawaii, Navajo Nation Nevada, and Northern Mariana Islands	866-EPA-9378, 415-947-8000
Region X	Tribal Air Permits Coordinator U.S. EPA, Region 10, AWT-150 1200 Sixth Avenue, Suite 900 Seattle, WA 98101	Tribal Air Permits Coordinator U.S. EPA, Region 10, AWT-150 1200 Sixth Avenue, Suite 900 Seattle, WA 98101	Alaska, Idaho, Oregon, and Washington	800-424-4372, 206-553-1200