

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Asheville Regional Office
County: McDowell
NC Facility ID: 5600169
Inspector's Name: Brendan Davey
Date of Last Inspection: 07/24/2009
Compliance Code: W / Violation - procedures

| | | | |
|---|---|---|---|
| Facility Data | | | Permit Applicability (this application only) |
| Applicant (Facility's Name): JELD-WEN, Inc. Facility Address: JELD-WEN, Inc. 100 Henry McCall Road Marion, NC 28752 SIC: 2493 / Reconstituted Wood Products NAICS: 321219 / Reconstituted Wood Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V | | | SIP: Yes NSPS: NO NESHAP: NO PSD: NO PSD Avoidance: NA NC Toxics: YES 112(r): NA Other: |
| Contact Data | | | Application Data |
| Facility Contact | Authorized Contact | Technical Contact | Application Number: 5600169.09C Date Received: 09/17/2009 Application Type: Modification Application Schedule: TV-Sign-501(c)(2) Existing Permit Data Existing Permit Number: 06486/T15 Existing Permit Issue Date: 11/02/2009 Existing Permit Expiration Date: 01/30/2014 |
| Jim English General Manager (828) 724-9511 100 Henry McCall Road Marion, NC 28752 | Jim English General Manager (828) 724-9511 100 Henry McCall Road Marion, NC 28752 | Julie White Environmental Permitting Technician (541) 883-3373 PO Box 1540 Klamath Falls, OR 97601 | |
| Review Engineer: Joseph Voelker Review Engineer's Signature: Date: | | Comments / Recommendations: Issue 06486/T16 Permit Issue Date: Permit Expiration Date: | |

I. Introduction

JELD-WEN (JE) manufactures door skins from wood fibers mixed with a urea-formaldehyde resin bonding agent.

As stated in the permit application:

JELD-WEN is proposing to manufacture a new type of fiber door skin. The new door skin will utilize a fiberglass material in conjunction with wood fiber. The proposed manufacturing process will include the installation of a fiberglass chopper to ensure the material is cut to the desired size and added to the system at the blender chute at the desired feed rate. The new manufacturing process will take place on one of the two manufacturing lines and the proposed annual production will only be a fraction of the total line production. JELD-WEN is also proposing to increase the mat size on each of the two press lines. With the addition of the new fiber door skin and the change in the mat size of the standard fiber door skins, the hourly and annual production will increase

This increase in production will also result in an increase in chemical usage and emissions. JE has also switched its resin to a "no added formaldehyde" formulation (NAF) that will offset some of the increase associated with the increase in production. The data was

gathered in engineering tests approved by the DAQ in an applicability determination issued June 26, 2008 (determination no. 1271). These data however have not been reviewed by the DAQ. As a result, testing to validate the new emission estimates will be included in the revised permit.

Although JE has switched to the NAF resin the current permit limitations are based on the previous formulation and in the testing approval letter of June 26, 2008, JE was required to

During subsequent conversations of receipt of this request with Julie White of Jeld-Wen, it was agreed that until the permit is modified accounting for this resin change, all emissions and compliance reporting will be based upon the factors (as necessary) or data from either resin which results in the largest emissions estimate for each pollutant.

Note that JE is working with the EPA on a global consent agreement to bring this facility in compliance with MACT Subpart DDDD. The draft language of the SOC will require testing. Any imposed testing as a result of this modification will be required to be completed concurrently with the SOC testing for expediency and given the pollutants of interest (HAP/TAP/VOC) are the same.

II. Chronology

| Date | Description |
|------------|--|
| 09/17/2009 | An application was received in the RCO. This application was assigned no. 5600169.09C . The application was deemed incomplete as it did not address the zoning consistency determination requirements. The application was put on "pending acceptance". |
| 09/24/2009 | ADD INFO email sent requesting numerous items including electronic copies of application materials, enhanced explanations, etc. to facilitate the review process. |
| 10/26/2009 | Info requested on 09/24/2009 was received via email |
| 11/12/2009 | An email was received from Bonnie Basden stating: <i>Zoning does not apply for this permit modification because the facility is not "expanding". The facility is not breaking ground, or installing new equipment outside, or changing the SIC code of the facility. Therefore, (b)(2) of the zoning regulation does not apply.</i> The IBEAM clock was "restarted." |
| 11/17/2009 | ADD INFO email sent requesting the verification of the PM10 emission estimates for the facility namely the emissions as presented in Table 3A of the application |
| 11/18/2009 | Phone discussion occurred with Bonnie Basden of JE regarding information requested on 11/19/2009. Ms. Basden stated that the table 3A references the process flow sheet included as Figure 1. In the end, it was discovered that for the baghouse, BH2, the PM10 emission rate was incorrect. JMV recommended review of all the calculations to ensure similar errors did not exist. Since the PM10 emission rate was incorrect, the PM10 NAAQS modeling demonstration would have to be revised. |
| 11/19/2009 | Phone discussion occurred with Bonnie Basden of JE regarding the PM10 emission calculations. It was determined that the error was an isolated one (the BH2 emission rate). Ms. Basden reran the PM10 NAAQS model and was preparing to submit the revised analysis for review by the AQAB |
| 11/24/2009 | The revised PM10 modeling was submitted via email to Jerry Freeman of the AQAB. |
| 11/30/2009 | Jerry Freeman issued a memo stating that the revised analysis "...successfully demonstrated compliance for PM10with the National Ambient Air Quality Standards" |
| 12/4/2009 | DRAFT permit and review was sent to William Willets (RCO) and Brendan Davey of the ARO for review |
| 12/9/2009 | Email from Brendan Davey of the ARO with comments. |
| 12/10/2009 | Email from William with comments. |
| 12/10/2009 | Revised DRAFT permit was sent to Jeld-Wen (Bonnie Basden) for review |

| Date | Description |
|------------|--|
| 12/11/2009 | Email from Bonnie Basden of Jeld-Wen with comments on Draft emailed on 12/10/2009. Most comments were minor (significant figures in emission rates, typos). However, she did request we revise the language in the SOC (Sec. 2.4) to allow the permit application required to be submitted with the Initial MACT Compliance Plan that will be required in the Global Consent Decree instead of an earlier date. The DAQ concurred that made common sense and this change was made. |
| 12/11/2009 | The revised draft based on Jeld-Wen's 12/11/2009 comments were sent to Jeld-Wen (Bonnie Basden) for review |
| 12/15/2009 | Jeld-Wen requested we change the reference of the "Excel" products to "fiberglass added products." The DAQ agreed with this request. The use of a trade name (in this case a "working" trade name) could cause compliance issues if the facility changed the name of the product even if the formulation remain unchanged. Note that the fiberglass added formulation/process rates (as well as the other product formulations/process rates) for permitting purposes are contained in the permit application. |
| TBD | Concurrent public and EPA public comment period begins. Public Notice was published in the McDowell News. |
| TBD | Public Comment Period ended. No comments received. |

III. Equipment List and Insignificant Activities List

No changes are necessary. The additional equipment associated with the new doorskin formulation was reviewed in permit application 09B which also resulted in no changes to these lists. Although no changes to these lists are being made the modification has regulatory implications with the various permitted sources. These implications will be discussed in Section IV.

IV. Regulatory review

This modification will not result in the applicability of any new regulations.

Table 1D of the application provides an exhaustive list of the maximum production and process rates from the modified facility.

Currently, production of door skins is limited by the 2D.1100 (2.2.A.3) and the 2D.0501(e) (2.2A.5) conditions to 17,160 ft² – 1/8" basis per hour per press.

The modification will result in the following requested production rates:

**Table IV-1
Requested Production Limitations**

| Doorskin Production Rate | Maximum Process Rates Short Term ft ² 1/8" basis/hr | Maximum Process Rates Long Term ft ² 1/8" basis/yr | Ratio Long term/(short term * 8760 hr/yr) | Ratio Proposed hourly limit/ current hourly limit |
|-------------------------------|---|--|---|---|
| Line 1 | 20,727 | 172,492,364 | .95 | 1.2 |
| Line 2 | 15,777 | 131,298,464 | .95 | 0.9 |
| Line 1 Fiberglass added Skins | 18,095 | 31,666,667 | .20 | 1.1* |

*Fiberglass added skins are currently made but do not have a unique production limitation

Thus, the overall the maximum hourly production will increase by 13% [(20,727 + 15,777)/(17160+17160)].

Note that the fiberglass added skins are expected to be a relatively small fraction of the overall production on an annual basis.

The increase in production and the reformulation of the NAF resin yields the following changes in emissions. (Table 3-2 from page 3 of the application)

TABLE 3-2 PROPOSED EMISSION CHANGE

| Pollutant | Current Emissions | | Proposed Emissions | | Emissions Net Change | |
|------------------|-------------------|-----------|--------------------|-----------|----------------------|-----------|
| | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) | (lbs/hr) | (tons/yr) |
| PM | 20.04 | 79.6 | 21.41 | 86.3 | 1.37 | 6.7 |
| PM ₁₀ | 19.02 | 75.6 | 20.12 | 81.5 | 1.10 | 5.9 |
| SO ₂ | 1.11 | 4.9 | 1.11 | 4.9 | 0 | 0 |
| NO _x | 13.05 | 57.0 | 13.06 | 57.1 | 0.01 | 0.1 |
| CO | 29.11 | 127.4 | 29.13 | 127.5 | 0.02 | 0.1 |
| VOC | 47.99 | 179.8 | 101.87 | 201.6 | 53.88 | 21.8 |
| Total HAP | 16.66 | 62.8 | 20.12 | 78.8 | 3.46 | 16.0 |

Given that in principle this increase in production could increase the potential and actual emissions of most sources, the regulatory review will address all sources together where expedient and applicable.

15A NCAC 2D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

This rule applies to the natural gas fired boilers (B2 and B3). This modification will not alter the maximum heat input to the boilers, which is the rate considered for compliance purposes. Continued compliance is expected with this rule. No permit changes are necessary.

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

This rule applies to the boiler (B1). This modification will not alter the maximum heat input to the boiler, which is the rate considered for compliance purposes. Since the boiler may burn some adulterated fuel with resins and now fiberglass the PM emissions may increase because of an assumption that the fiberglass is less likely to burn. In any case, the maximum fiberglass usage on line 1 (only line 1 will be permitted to do so) is to be 656 lb/hr. Line 1 has a maximum wood chip usage rate of 19,665 Bone Dry pounds per hour. The ratio of fiberglass to wood is therefore 0.03. Since only a small fraction of the woodwaste from production is burned compared to unadulterated wood, it is expected that the use of fiberglass will have a negligible impact on the PM emission rate. Continued compliance is expected with this rule. No permit changes are necessary.

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

This rule applies to the boiler (B1 B2 and B3). This modification will not alter the fuel type to the boilers, hence no changes to the sulfur content. Continued compliance is expected with this rule. No permit changes are necessary.

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

This rule applies to all sources at the facility. The increase in production will not require changes to air flow on capture and control systems. Hence current PM control systems (where used) should be adequate for the increase in production. Other sources have low visible emissions and would not be expected to increase as a result of this modification. Continued compliance is expected with this rule. No permit changes are necessary.

15A NCAC 2D .0524: NSPS 40 CFR PART 60 SUBPART Dc

This rule applies to the boiler (B2). This modification will not alter the maximum heat input to the boiler, which is the rate considered for determination of compliance requirements. Continued compliance is expected with this rule. No permit changes are necessary.

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

This rule affects the presses as well as all the bagfilter-controlled sources. The increase in production will not require changes to air flow on capture and control systems. Hence current PM control systems (where used) should be adequate for the increase in production. The presses have low PM emissions and would not be expected to increase as a result of this modification. Continued compliance is expected with this rule. No permit changes are necessary.

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

The increase in production should not affect JE's ability to comply with the work practices required by this rule. Continued compliance is expected with this rule. No permit changes are necessary.

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

It is unclear if increased production is likely to cause any odor issues but it would seem doubtful. In any case, the rule is complaint driven and such a determination is not critical. Thus, continued compliance is expected with this rule. No permit changes are necessary.

15A NCAC 2D .0614 COMPLIANCE ASSURANCE MONITORING

Based on a review of Table 3A in the supporting calculations for the application, the increase in potential emissions will not result in any sources needing to have CAM plans that do not already have one. No permit changes are necessary.

15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**Subpart QQQQ National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products**

The permit condition as written will not require any modification to address the increase in chemical (HAP) usage at the facility. The MACT does not impose a ceiling on emissions. Note that the increase in potential HAP emissions as a result of this modification will increase from 62.8 tpy to 78.8 tpy as seen in Table 3-2 above (also Table 3-2 from page 3 of the application). Continued compliance is expected with this rule. No permit changes are necessary.

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

The permit condition as written will not require any modification to address the increase in chemical (HAP) usage at the facility. The compliance date was October 1, 2008. Jeld-Wen is working with the US EPA on a global consent decree to address compliance with MACT Subpart DDDD. The current permit has a Schedule of Compliance requiring

The Permittee shall continue to work with the USEPA to achieve a Consent Decree. Upon consent to the entry of the Consent Decree, JELD-WEN shall submit a permit application within 30 days to update this schedule of compliance.

No permit changes are necessary at this time.

15A NCAC 02D .0501 COMPLIANCE WITH EMISSION CONTROL STANDARDS

The permit contains PM10 emission rate limitations that are primarily enforced by the following limitations

- i. the door skin throughput will be limited to 17,160 ft² – 1/8" basis per hour per hot press (**ID Nos. ES-P1 and ES-P2**); and
- ii. the boilers, **ID Nos. ES-B3 and ES-B1**, shall never be operated simultaneously

Since the permittee is increasing production beyond these limits, a dispersion modeling exercise was required to ensure the NAAQS would not be exceeded.

Table 3-1 of Appendix F of the application presents the modeled PM10 emission rates. These rates were verified with the supporting calculations with one exception. The Line 2 Main Waste Baghouse vent (BH2) was initially modeled at 6.06E-4 lb/hr, annual basis and 3.43E-03 lb/hr 24-hr basis. Upon review it was determined that these rates should have been 0.118 lb/hr lb/hr 24-hr basis and 0.01 lb/hr, annual basis.

The model was conducted again and Jerry Freeman issued a memo on November 30, 2009 which summarizes the results and shows that the modeling analysis for PM10 resulted in maximum modeled concentrations of 77 % of the 24-hour standard and 82% of the annual standard.

Jerry Freeman states

“The analysis successfully demonstrated compliance for PM10 with the National Ambient Air Quality Standards”

It is interesting to compare these modeling results with the previous modeling approved in a memo from Mark Yoder of the AQAB dated September 28, 2007 and discussed in the review for permit T13. The results are as follows

2007 Modeling Results

| Pollutant | Averaging period | Total concentration (including background) (mg/m ³) | NAAQS (mg/m ³) | Percentage of NAAQS |
|------------------|------------------|---|----------------------------|---------------------|
| PM ₁₀ | 24-hour | 84.032 | 150 | 56 |
| | Annual | 42.639 | 50 | 85 |

Note the short-term impact has increased from 56 to 77%, which is reasonable considering the expected increase in throughput. However, the annual impact decreased from 85% to 81%. The meteorological data used were the same and the dispersion parameters appeared to be the same. A cursory review of the emission rates modeled in 2007 and 2009 show lower emission rates from the boiler and the press vent stack, although not dramatically so. This engineer suspects that the previous modeled rates were perhaps more conservative (greater); those input values were not subject to the close scrutiny that the current rates have been. Coupled with this is what appears to be a different version of the AERMOD model. In conclusion, the current modeling analysis and input data has been reviewed and appears to be an acceptable demonstration that the PM10 24 and annual NAAQS will not be exceeded upon the modification of the facility as represented in this application.

The rates modeled were worst case controlled emissions associated with the maximum production rates presented above in Table IV-1. It is noted, as with the limitations in the current permit, the PM10 emissions associated with the natural gas boilers were modeled with only one boiler operating at a maximum heat input of 33.48 MMbtu/hr. The reason was explained in the review for permit no. T13:

The applicant responded stating “ The reason the temp boiler was included is because we do annual maintenance on the wood fired boiler and we bring in the temp boiler to operate while the wood fired boiler is down. The maintenance lasts about 10-days. If possible, we would like to keep the temp boiler in our permit. Can we include a condition that states the temp boiler can only operate while the wood fired boiler is not operating?”

Thus, this restriction will remain unchanged in the revised permit.

The permit condition will be revised with the modeled emission rates and the new production limitations. The recordkeeping and reporting otherwise will remain unchanged.

SECTION .1100 - CONTROL OF TOXIC AIR POLLUTANTS
15A NCAC 02D .1106 DETERMINATION OF AMBIENT AIR CONCENTRATION
15A NCAC 2Q .0711: “PERMIT REQUIREMENTS FOR TOXIC AIR POLLUTANTS”

As stated in Section 3.2 of the permit application...

The proposed changes will increase the annual facility-wide emissions and the hourly emission rates. Along with the increase in hourly emissions there will be two TPERs that will be exceeded. Therefore, modeling for PM10, formaldehyde, acrolein, and phenol is required for this project. The modeling report for this project is located in Appendix F.

The current permit has emission limitations for only formaldehyde.

Table 3-1 of Appendix F of the application presents the modeled formaldehyde, acrolein, and phenol emission rates. These rates were verified with the supporting calculations.

The rates modeled were worst case controlled emissions associated with the maximum production rates presented above in Table IV-1. It is noted, the permittee modeled formaldehyde emissions associated with the natural gas boilers and with only one boiler operating at a maximum heat input of 33.48 MMbtu/hr. TAP emissions from combustion of unadulterated fuels are exempt from **15A NCAC 02Q .0702 EXEMPTIONS**. As such, these rates will not be included in the permit nor will a boiler operational restriction be placed in to the permit.

Table 4-1 of the application summarizes the results and show that the modeling analysis for these three TAPs. The modeling:

1. for formaldehyde resulted in a maximum modeled concentration of 15 % of the 1-hour standard
2. for acrolein resulted in a maximum modeled concentration of 10 % of the 1-hour standard
3. for phenol resulted in a maximum modeled concentration of 2 % of the 1-hour standard

Jerry Freeman of the AQAB (Air Quality Analysis Branch) reviewed the modeling and issued a memo on October 13, 2009 stating

“The analysis successfully demonstrated compliance for all the pollutants, on a source by source basis, with the NC Acceptable Ambient Levels (AAL) guidelines as well as with the National Ambient Air Quality Standards”

The 2D.1100 permit condition will be revised with the modeled emission rates and the new short-term hourly production limitations. The recordkeeping and reporting otherwise will remain unchanged.

The 2Q.0711 condition will be revised by removing acrolein and phenol.

The TAP emission rates are based on the results of source testing that occurred at the facility and similar sources over the past two years using the NAF resin. These source tests were not witnessed nor reviewed by the DAQ. As a result a test condition will be placed into the permit to verify these TAP emission rates.

It is expected (through examination of draft EPA/JE Global consent decree language) that JE will have to test for MACT Subpart DDDD “Total hazardous air pollutant emissions” which are defined as

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.

Thus, it is expected that this testing can happen concurrently with that testing. The time frame required to verify the TAP emission rates therefore will mirror the 6-month window in the global SOC draft language.

V. Facility-wide regulatory considerations

NSPS

Boiler ES-B2 is a NSPS Subpart Dc affected source with recordkeeping requirements. See discussion in Section IV.

PSD

The facility is currently a PSD minor source. The emission increases as presented in Table 3-2 in Section IV show that this modification is also a PSD minor modification. No additional review is necessary.

NESHAPS

See discussion above in Section IV.

CAM

See discussion above in Section IV.

Attainment

McDowell County is in attainment for all pollutants.

VI. Changes to Existing Air Permit

| Existing Condition No. | Revised Condition No. | Changes |
|-------------------------------|-----------------------|---|
| Cover Letter | Same | <ul style="list-style-type: none"> Updated permit revision numbers, dates, etc. and |
| Insignificant Activities list | Same | <ul style="list-style-type: none"> Per current DAQ guidance changed: ATTACHMENT to Permit No. 06486T16 to ATTACHMENT to cover letter to Air Quality Permit Number 06486T16 |
| Permit Cover page | Same | <ul style="list-style-type: none"> Updated dates, revision numbers, etc. |
| Permit page 3 | Same | <ul style="list-style-type: none"> The first two introductory paragraphs were removed as they have been deemed redundant and unnecessary |
| Equipment list | Same | <ul style="list-style-type: none"> Revised the descriptors for the resin storage tanks ST-R1 and R2 to reflect the change in reformulation of the resin. The descriptors will now read: <i>Storage tank containing resin (7,400 gallons capacity)</i> |
| 2.1.C.3 | Same | <ul style="list-style-type: none"> Revised PM10 emissions rates in the applicable regulations table [2D.0501(e)] |
| 2.1.G.3. | Same | <ul style="list-style-type: none"> Revised PM10 emissions rate in the applicable regulations table [2D.0501(e)] |
| 2.1.H | 2.1.H. | <ul style="list-style-type: none"> Revised tank descriptors (see equipment list change) Removed reference to 2D.1100. The tanks no longer emit NC TAP (formaldehyde). |

| Existing Condition No. | Revised Condition No. | Changes |
|------------------------|------------------------|--|
| 2.2.A.3. | Same | <ul style="list-style-type: none"> The Formaldehyde emissions rates were revised based on the revised modeling Emission rate limitations for phenol and acrolein were added. |
| 2.2.A.3.a.i. | Same | <ul style="list-style-type: none"> The doorskin throughput for the “no-fiberglass-added” skins for press 1 was revised to those requested in the permit application and used in the 2D.1100 modeling demonstration. |
| 2.2.A.3.a.ii | Same | <ul style="list-style-type: none"> The exhaust temperature limitation was removed given the large margin of compliance resulting from the use of the “no-added” formaldehyde resin. The limitation was replaced with a press 1 throughput limitation for the “fiberglass-added skins” as requested in the permit application and used in the 2D.1100 modeling demonstration. |
| 2.2.A.a.iii. | Same | <ul style="list-style-type: none"> The average velocity limitation was removed given the large margin of compliance resulting from the use of the “no-added” formaldehyde resin The limitation was replaced with a press 2 throughput limitation as requested in the permit application and used in the 2D.1100 modeling demonstration. |
| 2.2.A.3.b. | Same | <ul style="list-style-type: none"> The monitoring requirements associated with exhaust gas temperature and velocity limits were removed as discussed above The recordkeeping requirements for doorskin throughput are now indicated as this condition (b) |
| 2.2.A.3.c. | 2.2.A.3.b. | <ul style="list-style-type: none"> Revision T15 recordkeeping requirements are now indicated as condition b. |
| 2.2.A.3.d. | 2.2.A.3.c. | <ul style="list-style-type: none"> Revision T15 reporting requirements are now indicated as condition c. Added reporting of acrolein and phenol Removed reporting associated with exhaust gas temperature and velocity limits |
| 2.2.A.3.e. | 2.2.A.3.d. | <ul style="list-style-type: none"> Revision T15 testing requirements are now indicated as condition d. The testing requirement was revised to require testing for the acrolein, formaldehyde and phenol, that are also regulated as “Total HAP” under MACT Subpart DDDD. |
| 2.2.A.4 | Same | <ul style="list-style-type: none"> Removed acrolein and phenol from the TAP TPER list |
| 2.2.A.5. | Same | <ul style="list-style-type: none"> PM10 emission rates were revised based on the revised modeling Long term emission rates were incorporated into the permit since they are different than the short term rates in some cases. The previous modeling used the short-term maximum rates for the annual PM10 NAAQS modeling as well. |
| 2.2.A.5.a.ii. | 2.2.A.5.a.ii., iii, iv | <ul style="list-style-type: none"> The production limitations for the presses were revised based on rates requested in this application |
| 2.2.A.5.a.iii. | 2.2.A.5.a.v. | <ul style="list-style-type: none"> No change |
| 2.3.A.1 | Same | <ul style="list-style-type: none"> Revised the language to allow the permit application required to be submitted with the Initial MACT Compliance Plan that will be required in the Global Consent Decree. |
| General Conditions | Same | <p>Revised to current revision 3.0. The only change was in condition D as follows:</p> <p><i>All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).</i></p> |

VII. Compliance History

Jeld-Wen is working with the US EPA on a global consent decree to address compliance with MACT Subpart DDDD, for which the compliance date has passed (October 1, 2008).

Brendan Davey conducted a compliance inspection on 3/24/2009. The facility was found to be in compliance with all applicable air regulations with the exception of MACT Subpart DDDD. Note Jeld-Wen is working with the US EPA on a global consent decree to address compliance with MACT Subpart DDDD.

VIII. Public Notice

TBD

IX. Comments and Conclusions

TBD

X. Recommendations

~~It is recommended that permit no. 06486T16 be issued.~~