INITIAL TITLE V AIR PERMIT APPLICATION REVIEW

Revised 7/12/99

APPLICANT:	SITE LOCATION:		COUNTY:
Georgia Pacific Corporation Roxboro Plant	Roxboro		Person
TECHNICAL CONTACT:	**PHONE:**	**RESPONSIBLE OFFICIAL:**	**TITLE:**
Gary Bittner	336-599-1000	Ralph Cook	Plant Manager
REVIEW ENGINEER:	**SIGNATURE:**		**DATE:**
Kevin Godwin			xx
REGIONAL CONTACT:	**REGIONAL OFFICE:**		**SIC CODE:**
Edward McKee	Raleigh		2493
APPLICATION NUMBER:	**EXISTING PERMIT NUMBER:**		**NEW PERMIT NUMBER:**
730052A5.A	07668R09		**07668T10**

I. Introduction

The U.S. Environmental Protection Agency (EPA) has given final approval to North Carolina's Title V operating permits program effective on October 1, 2001. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality. Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This Initial Title V Air Permit application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

II. Background Information

The DRAFT Title V operating permit replaces an existing Air Quality Construction and Operation Permit No. 07668R09 which was issued on May 31, 2001 and is currently scheduled to expire on November 30, 2003. A request for permit renewal was received at the Raleigh Regional Office on August 11, 2003 and it was assigned application number 7300052.03A. The renewal application is combined with this initial Title V operating permit. Based on the 1997 emissions inventory, this facility is subject to the Title V program due to potential nitrogen oxides (107 tpy), particulate matter less than 10 microns (157.8 tpy) and carbon monoxide (138 tpy) emissions each exceeding the major source threshold.

Pursuant to 15A NCAC 2Q .0506 Georgia Pacific Corporation submitted its initial Title V application to the Division of Air Quality on February 6, 1996. The application was considered complete for processing on March 21, 1996. The DRAFT permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

III. Facility Description

Georgia Pacific Corporation operates a laminated veneer lumber (LVL), I-beam, and oriented strand lumber (OSL) manufacturing facility at this Person County site. Logs are trucked to the mill in various lengths. The logs pass through a debarker followed by cut-off saws which cut the logs to 104".

LVL Process

Logs kicked from the log deck are placed in log tunnels for several hours where they are conditioned by showering them with hot water to raise moisture content and temperature to a point that facilitates smooth peeling on the lathe. Logs are reduced to veneer by the lathe, checked for defects, then moved to the veneer dryer. After being dried, the veneer is graded for strength. Graded sheets are placed on the LVL line and "laid-up" into what is termed a LVL billet. To lay-up a billet of LVL, each of veneer passes through a glue curtain coater that applies adhesive to the sheet. Following this, one sheet is placed on top of another until the correct number of layers has been placed. After the full number of sheets is laid, the billet then indexes forward so that a similar lay-up can be made on the trailing end of the previous until the length is 100 feet. The uncured billet is then placed into a hot press for curing. The billet is kept under pressure and temperature for a time sufficient to achieve an adequate glue bond. Once the cured billet exits the press, it can go either to be cut to finished size or it may be forwarded for further processing as plank or I-beam assembly.

I-beams are made by joining LVL produced in the plant with oriented strand board (OSB) purchased from an outside source.

OSL Process

Logs are placed in the OSL slasher deck. The slasher deck is used to cut the logs into 33"-35" pieces which are fed into the flaker. The flaker reduces the logs into flakes roughly the size of "band-aids". These green flakes are then metered through a dryer. Dried flakes are deposited into a rotary drum screen. After screening, the dry flakes are conveyed to storage bins. Upon exiting the storage bins, resin is applied to the flakes. The resinated flakes go to storage bins atop the forming line. The forming line is simply a large conveyor onto which flakes are accurately metered and then cascaded onto, developing a "mat" of precisely resinated and weighed flakes. The mat is then loaded into a hot press. As in the LVL process, the hot press keeps the mat under heat and pressure for a specified time. After the press, panels are conveyed through a series of rip saws that cut the panels lengthwise into desired widths. Ripped boards are crosscut to desired lengths.

IV. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. On its latest inspection, performed by Edward McKee on January 19, 2002, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is being issued.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1	wood-fired boiler/hot oil heater (70 million Btu per hour heat input)	CD-1	multicyclone (54 tubes, 9 inch diameter each)

ES-2A ES-2B	*Timber (log) preparation operations including:* one log-end cut-off system one log de-barking (ring-type) and sorting (peeler or flaker line) system	n/a	n/a
ES-3A ES-3B ES-3C	*Green wood fuel handling and hogging operation including:* one lilly-pad chipper one hammermill one flowmatic fuel-feed bin	n/a	n/a
ES-4A ES-4B ES-4C ES-4D ES-4E ES-4F	*Veneer operations including:* one steam-heated hot water spray chest one veneer lathe one green veneer clipper one green veneer chipper one green veneer stacker and storage operation one steam-heated roller jet green veneer dryer (12.5 thousand square feet per hour drying capacity on a 3/8" basis) and storage area	CD-4D	simple cyclone (96 inches in diameter)
LVL1 ES-5C ES-5D	*Laminated Veneer Lumber (LVL1) operations including:* one glue pre-heater, curtain coater, and panel operation one steam-heated laminated veneer lumber press	n/a	n/a

	***I-Beam Assembly and Header operations including*:**	CD-8	one bagfilter (5,767 square feet of filter area) installed on wood dust collection system (ID No. 4)
ES-8A2 ES-8A3	*an LVL in-feed operation consisting of:* one LVL panel cross-cut saw, on LVL panel rip saw		
ES-8B1 ES-8B2 ES-8B5 and 8B5.1 ES-8B6	*an I-Beam assembly operation consisting of:* two flange groove saws, two I-beam assembly glue extruders, two grade markers one curing tunnel		
ES-8C2 ES-8C3	*a Web sawing operation consisting of:* one OSB/RB end trim and tongue and groove operation, and one OSB/RB ripsaw		
ES-8E	I-beam precision end trimmer (PET saw)		
ES-10 ES-10B	one dry wood dust silo (72 feet in height) truck loading bin	CD-10 CD-10B	one bagfilter (382 square feet of filter area) one bagfilter (854 square feet of filter area)
LVL2	*Laminated Veneer Lumber (LVL2) operations including:*		
ES-12A ES-12B ES-12C	one oil heated press one glue pre-heater, curtain coater, and panel operation one dry veneer scarfing operation	n/a	n/a
ES-8A1 ES-12D ES-13B ES-8I	LVL flying saw LVL rip and trim saws LVL #3 saw quality assurance lab table saw	CD-12E1 and CD-12E	one bagfilter (3,296 square feet of filter area) in series with one simple cyclone (136 inches in diameter)
ES-12F ES-12G	truck loading bin attached to discharge of cyclone (CD-12E) edge coating spray booth		

ST1, ST2, ST3, ST6, ST7, and ST8 ST4	six resin storage tanks (ST1, ST2, and ST3 with 10,400 gallons capacity each and ST6, ST7, ST8 with 6,186 gallons capacity each) one wax storage tank (8,000 gallons capacity)	n/a n/a	n/a n/a
LVL3 ES-13A ES-12H ES-12I ES-12J ES-12K ES-13C	*Laminated Veneer Lumber (LVL3) operations including:* one oil heated laminated veneer lumber press one LVL bundle cut saw one LVL re-rip saw one LVL rework trim saw one LVL dust sweep one LVL#3 rip saw	 n/a CD-13D1 and CD-13D	 n/a one bagfilter (3,296 square feet of filter area) in series with one simple cyclone (132 inches in diameter)

VI. Emission Source-by-Source Evaluation

A. Wood fuel-fired boiler/hot oil heater (ID No. ES-1)

1. Description

   This boiler is used continuously to provide process heat while burning scrap woodwaste. A multicyclone with an estimated control efficiency of 75% is installed to control particulate matter emissions. According to the application, the boiler was originally operated in 1986.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	**Limits/Standards**	**Applicable Regulation**
particulate matter including PM_{10}	0.45 pounds per million Btu heat input	15A NCAC 2D .0504
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521(d)

a. **15A NCAC 2D .0504 "Particulate from Wood Burning Indirect Heat Exchangers"**

i.) **Regulatory Analysis**

This boiler is subject to this regulation since wood fuel is burned for the primary purpose of producing heat by indirect heat transfer. Allowable emissions of particulate matter from wood fuel combustion from the boiler is:

$$\mathbf{E = 1.1698 \times Q^{-0.2230}}$$

Where: E = allowable particulate emissions rate in pounds per million Btu
Q = maximum heat input rate in million Btu per hour

The total maximum heat input of all the wood burning indirect heat exchangers at this site (Q = 70 million Btu per hour heat input) is used to determine the allowable emission limit.

$\mathbf{E_{allow}}$ **= 0.45 pounds particulate per million Btu heat input or 31.5 lbs PM/hour** for the firing of wood fuel in this boiler.

After control particulate emissions are estimated at **6.28 lbs PM/hour** during wood combustion. Since the controlled potential emissions are less than the allowable emissions, compliance is expected.

ii.) **Testing Requirements**

For TV purposes, the DAQ requires wood-fired boilers to be tested if the boiler has not ever been tested or five years have past since the last test. This boiler will be stack-tested during the first year of the term of the permit as a condition of the permit.

iii.) **Monitoring Requirements**

Particulate matter emissions from the boiler shall be controlled by a multicyclone. To ensure that optimum control efficiency of particulate matter is obtained by the multicyclone, monthly inspections will be performed and maintenance will be performed as recommended by the manufacturer. As a minimum, the inspections will include a monthly external inspection of the multicyclones and ductwork, and an annual internal inspection of the multicyclones to ensure structural integrity. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504 if the multicyclones and ductwork are not inspected and maintained.

iv.) **Recordkeeping Requirements**

The results of the inspection and maintenance will be kept in a log book.

v.) **Reporting Requirements**

A summary report of the monitoring will be submitted by January 30 and July 30 of each year. The results of any maintenance to the control devices shall be reported within 30 days of a written request by DAQ.

b. **15A NCAC 2D .0516 "Sulfur Dioxide Emissions From Combustion Sources"**

i.) **Regulatory Analysis**

The boiler is a source of combustion which discharges through a stack and therefore, is subject to 15A NCAC 2D .0516(a). Allowable emissions of sulfur dioxide from the firing of wood in the boiler may not exceed **2.3 pounds per million Btu heat input.** The allowable emissions are calculated to be **161 lbs SO_2/hr.** Compliance is expected.

ii.) **Monitoring/Recordkeeping/Reporting Requirements**

There are no monitoring, recordkeeping, or reporting requirements for this boiler since sulfur dioxide emissions from the combustion of wood will always be less than the allowables due to the inherently low sulfur content in wood.

c. **15A NCAC 2D .0521 "Control of Visible Emissions"**

i.) **Regulatory Analysis**

The boiler was constructed after July 1, 1971, and is therefore subject to 15A NCAC 2D .0521(d). Per this regulation visible emissions shall not be more than **20 percent opacity** when averaged over a six-minute period except that six-minute periods averaging no more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. Compliance with the opacity limits is expected to be achieved through daily visual observations of the emission stack.

ii.) **Testing**

Testing is not required at this time. However, the test method condition will be put in the permit in the event the DAQ finds that due to improper operation, violations, etc., source testing is required.

iii.) **Monitoring/Recordkeeping Requirements**

A daily visual observation of the emission stack will be performed and a daily log of the visual emission stack observation results will be maintained. During the first 30 days of the permit period, the facility will establish "normal" visible emissions from the boiler. When the stack testing is performed, a new "normal" will be established during the testing period. When visible emissions are observed above normal, the Permittee will determine the opacity by visual observation following Method 9 of Appendix A of 40 CFR or be deemed in noncompliance with 15A NCAC 2D .0521. Method 9 requires the observer to obtain certification through field testing every six months to qualify as an opacity reader.

iv.) **Reporting Requirements**

A summary report of the daily visible emission stack observation results shall be submitted by January 30 and July 30 each year.

B. Timber (log) preparation operations (ID Nos. ES-2A and 2B) and Green wood fuel handling and hogging operation (ID Nos. ES-3A, 3B, and 3C)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate ductwork and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

C. Veneer operations including:

steam-heated water spray chest (ID No. ES-4A)
veneer lathe (ID No. ES-4B)
green veneer clipper (ID No. ES-4C)
green veneer chipper (ID No. ES-4D)
green veneer stacker operation (ID No. ES-4E)
steam-heated roller jet veneer dryer (ID No. ES-4F)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate ductwork and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
particulate matter including PM_{10}	*for the veneer dryer (**ID No. ES-4F**):* $E = 4.10*P^{0.67}$ for $P < 30$ tons per hour or $E = 55.0*P^{0.11} - 40$ for $P > 30$ tons per hour where P is the process throughput rate	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521

toxic air pollutants	*for veneer dryer (**ID No. ES-4F**)* See Section 2.2 A. 1., **State-only requirement**	15A NCAC 2D .1100

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

ii.) **Monitoring** [15A NCAC 2Q .0508(f)]

Particulate matter emissions from the green veneer chipper (**ID No. ES-4D**) shall be controlled by a simple cyclone (ID No. CD-4D). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:

a. monthly external inspection of the ductwork and cyclone noting the structural integrity; and

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, and cyclone are not inspected and maintained.

iii.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

The results of inspection and maintenance for the cyclone shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The logshall record the following:

a. the date and time of each recorded action;
b. the results of each inspection; and
c. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

iv.) **Reporting** [15A NCAC 2Q .0508 (f)]

a. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For veneer dryer (ID No. ES-4F):

b. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

i.) Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

ii.) **Testing** [15A NCAC 2D .0501 (c)(3)]

a. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

iii.) **Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The Permittee shall maintain production records which specify the types of materials and finishes processed and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

iv.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

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

i.) Visible emissions from the sources associated with the veneer operations (**ID Nos. ES-4A, 4B, 4C, 4D, 4E, 4F, and 4G**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C. 3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a week the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the

emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 C.3. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
   iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

D. Laminated veneer lumber operations (LVL1) including:

glue preheater, curtain coater, and panel operation (ID No. ES-5C)
steam-heated laminated veneer lumber press (ID No. ES-5D)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	$E = 4.10*P^{0.67}$ where P is process throughput in tons per hour	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	work practice standards, See Section 2.2 B.	15A NCAC 2D .0958

a. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

i.) Emissions of particulate matter from the laminated veneer lumber **LVL1** sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

ii.) **Testing** [15A NCAC 2D .0501 (c)(3)]

a. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D. 1. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

iii.) **Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The Permittee shall maintain production records which specify the types of materials and finishes processed and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

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

i.). Visible emissions from these sources (**ID Nos. ES-5C and ES-5D**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 D. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a day the Permittee shall observe the emission points of this source for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If the emission sources is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily observation. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 D.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv. **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
i. the date and time of each recorded action;

ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

E. I-Beam assembly and header operations connected to wood dust handling system (ID No. 4) and associated bagfilter (ID No. CD-8)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate ductwork and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	work practice standards, See Section 2.2 B.	15A NCAC 2D .0958

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

ii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. Particulate matter emissions from the wood material collection systems (**ID No. 4**) shall be controlled by a bagfilter (ID No. CD-8). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
i. monthly external inspection of the ductwork, and bagfilter noting the structural integrity; and
ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, and

bagfilter are not inspected and maintained.

iii.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of inspection and maintenance for the bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each inspection; and
   iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

iv.) **Reporting** [15A NCAC 2Q .0508 (f)]

a. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

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

i.) Visible emissions from the sources associated with the I-Beam assembly and header operation shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 E. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a week the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 E.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and

made available to an authorized representative upon request. The log shall record the following:

i. the date and time of each recorded action;
ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

F. Wood dust silo (ID No. ES-10) and truck loading bin (ES-10B) and associated bagfilters

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate duct work and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

ii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. Particulate matter emissions from the wood dust silo and truck loading bin (**ID Nos. ES-10 and ES-10A**) shall be controlled by bagfilters. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
   i. monthly external inspection of the ductwork, and bagfilters noting the structural integrity; and
   ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, and bagfilters are not inspected and maintained.

iii.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of inspection and maintenance for the bagfilters shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each inspection; and
   iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

iv.) **Reporting** [15A NCAC 2Q .0508 (f)]

a. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

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

i.) Visible emissions from these sources (**ID Nos. ES-10 and ES-10A**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 F. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a week the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 F.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:

i. the date and time of each recorded action;
ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

G. Laminated veneer lumber (LVL2) operations including:

oil heated press (ID No. ES-12A)
glue preheater, curtain coater, and panel operation (ID No. ES-12B)
dry veneer scarfing station (ID No. ES-12C)
various LVL saws (ID Nos. ES8A1, ES-12D, ES-13B, ES-8I) and associated cyclone and bagfilter
truck loading bin (ID No. ES12F)
edge coating spray booth (ID No. ES-12G)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate ductwork and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	work practice standards, See Section VII C.	15A NCAC 2D .0958

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

ii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. Particulate matter emissions from the LVL2 saws (**ID Nos. ES-8A1, ES-12D, ES-13B, ES-8I**) shall

be controlled by a cyclone in series with a bagfilter. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:

i. monthly external inspection of the ductwork, cyclone, and bagfilter noting the structural integrity; and
ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilter noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclone and bagfilter and are not inspected and maintained.

iii.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of inspection and maintenance for the cyclone and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each inspection; and
   iii. the results of maintenance performed on any control device.

   The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

iv.) **Reporting** [15A NCAC 2Q .0508 (f)]

a. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

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

i.) Visible emissions from the sources associated with the LVL2 operation shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 G. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a week the Permittee shall observe the emission points of this source for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the

emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 G.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
   iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

H. Laminated veneer lumber (LVL3) operations including:

oil heated laminated veneer lumber press (ID No. ES-13A)
various LVL saws (ID Nos. ES-12H, ES-12I, ES-12J, ES-12K, ES-13C) and associated cyclone and bagfilter

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter including PM_{10}	adequate ductwork and properly designed collectors approved by the commission such that ambient standards are not exceeded	15A NCAC 2D .0512
visible emissions	20 percent opacity	15A NCAC 2D .0521
volatile organic compounds	work practice standards, See Section VII C.	15A NCAC 2D .0958

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

i.) The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

ii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. Particulate matter emissions from the LVL3 saws (**ID Nos. ES-12H, ES-12I, ES-12J, ES-12K, ES-13C**) shall be controlled by a simple cyclone in series with a bagfilter. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
   i. monthly external inspection of the ductwork, cyclone, and bagfilter noting the structural integrity; and
   ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters noting the structural integrity and the condition of the filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the ductwork, cyclone and bagfilter and are not inspected and maintained.

iii.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of inspection and maintenance for the cyclone and bagfilter shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each inspection; and
   iii. the results of maintenance performed on any control device.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.

iv.) **Reporting** [15A NCAC 2Q .0508 (f)]

a. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
b. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

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

i.) Visible emissions from the LVL3 sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

ii.) **Testing** [15A NCAC 2D .0501(c)(8)]

a. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 H. 2. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

iii.) **Monitoring** [15A NCAC 2Q .0508(f)]

a. To assure compliance, once a week the Permittee shall observe the emission points of this source

for any visible emissions above normal. The Permittee shall establish "normal" for the source in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either: (a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or (b) demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 H.2. a. above. If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

iv.) **Recordkeeping** [15A NCAC 2Q .0508(f)]

a. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each recorded action;
   ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
   iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

v.) **Reporting** [15A NCAC 2Q .0508(f)]

a. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

I. Six resin storage tanks (ID Nos. ST1, ST2, ST3, ST6, ST7, ST8) and one wax storage tank (ID No. ST4)

1. Applicable Regulatory Requirements

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	work practice standards, See Section VII C.	15A NCAC 2D .0958

VII - Multiple Emission Source(s) Specific Limitations and Conditions

STATE-ONLY REQUIREMENT:

A. TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT - Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded:

EMISSION SOURCE(S)	TOXIC AIR POLLUTANT(S)	EMISSION LIMIT(S)
veneer dryer (ID No. ES-4F)	acrolein formaldehyde	0.06 pounds per hour 0.95 pounds per hour

STATE-ONLY REQUIREMENT:

B. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT - Pursuant to 15A NCAC 2Q .0711 "Emission Rates Requiring a Permit," for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711.

a. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPERs.

b. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 "Control of Toxic Air Pollutants".

c. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

	TPERs Limitations			
Pollutant (CAS Number)	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
acetaldehyde (75-07-0)				6.8
acetic acid (64-19-7)				0.96
methyl ethyl ketone (78-93-3)		78		22.4
toluene (108-88-3)		98		14.4

C. Facility-wide affected sources

1. 15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

a. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:

(1) store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
(2) clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
(3) store wipe rags containing volatile organic compounds in closed containers,
(4) not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
(5) transfer solvents containing volatile organic compounds used to clean supply lines and other coating

equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,

(6) clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]

b. When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:
   (1) flush parts in the freeboard area,
   (2) take precautions to reduce the pooling of solvent on and in the parts,
   (3) tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
   (4) not fill cleaning machines above the fill line,
   (5) not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

Monitoring

c. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Recordkeeping

d. The results of the inspections shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
   i. the date and time of each inspection; and
   ii. the results of each inspection noting whether or not noncompliant conditions were observed.

   If the required records are not maintained the permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Reporting

e. The Permittee shall submit a summary report of the observations by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

VIII. MACT Applicability and Requirements

Based on a review of the facility's current operations and emission sources, the facility is not subject to an promulgated MACT standards. When promulgated, the facility will be subject to Subpart DDDD "Plywood and Composite Wood Product Manufacturing."

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. General Conditions

The "General Conditions" section of the Title V Operating Permits lists additional applicable rule requirements that the permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, and severability.

XI. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.

XII. Public Notice

Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list, the following affected states: Virginia, and EPA.

XIII. Recommendations

The initial Title V application for Georgia Pacific Corporation - Roxboro LVL Plant has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.