

STATE OF MONTANA
Department of Environmental Quality
1520 East Sixth Avenue
Helena, Montana 59620

AIR QUALITY OPERATING PERMIT NUMBER OP2303-01

Administrative Amendment Application Received: **March 20, 2003**
Application Deemed Administratively Complete: **March 20, 2003**
Application Deemed Technically Complete: **March 20, 2003**
AFS Number: **030-063-0002A**

Date of Decision: **April 14, 2003**
Effective Date: **May 15, 2003**
Expiration Date: **July 26, 2007**

In accordance with the Montana Code Annotated Section 75-2-217 and 218, and Administrative Rules of Montana (ARM), Title 17, Chapter 8, Subchapter 12, Operating Permit Program, ARM 17.8.1201, *et seq.*,

Roseburg Forest Products
3300 Raser Drive
Missoula, MT 59802
Section 8, Township 13 North, Range 19 West in Missoula County

Hereinafter referred to as “Roseburg” is authorized to operate a stationary source of air contaminants consisting of the emission units described in this permit. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants in accordance with the conditions of this permit. All conditions in this permit are federally and state enforceable, unless otherwise specified. Requirements, which are only state enforceable, are identified in the permit. A copy of this permit must be kept on site at the above-named facility.

Issued by the Department of Environmental Quality

_____/_____/_____
Signature Date

Permit Issuance and Appeal Process: In accordance with ARM 17.8.1210(j), the Department of Environmental Quality’s (Department) decision regarding issuance of an operating permit is not effective until 30 days have elapsed from the date of the decision issued April 14, 2003. The decision may be appealed to the Board of Environmental Review by filing a request for a hearing within 30 days after the date of decision. If no appeal is filed then the Department will send notification and a final permit cover page to be attached to this document stating that the permit is final. Questions regarding the final issuance date and status of appeals should be directed to the Department at (406) 444-3490.

**Montana Air Quality Operating Permit
Department of Environmental Quality
Permitting and Compliance Division**

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Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

Section I – GENERAL INFORMATION

Company Name: Roseburg Forest Products

Mailing Address: P.O. Box 4007

City: Missoula **State:** Montana **Zip:** 59806

Plant Name: Roseburg Missoula Particleboard Facility

Plant Location: Section 8, Township 13 North, Range 19 West in Missoula County

Plant Mailing Address: 3300 Raser Drive
Missoula, MT 59802

Responsible Official: Art Green

Phone: (406) 728-3910

Facility Contact Person: Ellen Porter

Phone: (406) 728-3910

Primary SIC Code(s): 2493

Nature of Business: Particleboard Manufacturing

Description of Process: This plant processes raw wood fiber into particleboard by refining the fiber, adding resin, and pressing the mat into boards. The raw material, primarily wood shavings from the planing process in sawmills, is transported to Missoula by truck. This material is unloaded at the plant and sent to any one of three locations: 1) conveyed to the outside storage pile, 2) conveyed to the storage building, or 3) conveyed as wet sawdust to the green bins to await predrying. The material is retrieved from the pile by front-end loader and conveyed to the dryers and the press line. Approximately 50% of the plant production is stored in this pile during the year. The wood fiber is then dried, blended with a resin, and introduced to the press line for particleboard production. Many baghouses and cyclones are used in the wood fiber handling systems. Sawdust and sander dust is used as fuel for the boiler and sander dust burners. This plant also contains a remanufacturing (REMAN) section, which processes the particleboard into finished wood that is used in furniture production.

Section II - SUMMARY OF EMISSION UNITS

The following emission units are regulated by this permit (ARM 17.8.1211).

Emission Unit ID	Description	Pollution Control Device/Practice
EU1	Plant-Wide	N/A
EU2	#1 Dryer Line 1 (DRY100)	Multiclone
EU3	#2 Dryer Line 1 (DRY101)	Multiclone
EU4	#3 Dryer Line 1 (DRY102)	Multiclone
EU5	#4 Dryer Line 1 (DRY103)	Multiclone
EU6	#1 Dryer Line 2 (DRY200 aka Dryer #5)	Multiclone
EU7	#2 Dryer Line 2 (DRY201 aka Dryer #6)	Multiclone
EU8	#1 Predryer (DRY500)	Multiclone
EU9	#2 Predryer (DRY501)	Multiclone
EU10	Outside Truck Dump Line 1 via Baghouse (BH50)	Baghouse
EU11	Milling and Drying via Baghouse (BH55)	Baghouse
EU12	Reject System Line 1 via Baghouse (BH100)	Baghouse
EU13	Reject System Relay Line 1 via Baghouse (BH101)	Baghouse
EU14	Board Trim System 5x25 via Baghouse (BH102)	Baghouse
EU15	Board Trim System 5x16 via Baghouse (BH103)	Baghouse
EU16	Core Air System Line 2 via Baghouse (BH200)	Baghouse
EU17	Face Air System Line 2 via Baghouse (BH201)	Baghouse
EU18	Mat Trim System Line 2 via Baghouse (BH202 aka Line 2 Press Line Baghouse)	Baghouse
EU19	Board Trim System Line 2 via Baghouse (BH203 aka Line 2 Sawline Baghouse)	Baghouse
EU20	Line 2 Relay via Baghouse (BH204 aka Line 2 Receiver Baghouse)	Baghouse
EU21	Six Head Sander via Baghouse (BH300A)	Baghouse
EU22	Six Head Sander via Baghouse (BH300B)	Baghouse
EU23	Six Head & REMAN Flat Line Relay via Baghouse (BH301)	Baghouse
EU24	Eight Head Sander via Baghouse (BH302)	Baghouse
EU25	Eight Head Sander via Baghouse (BH303)	Baghouse
EU26	Eight Head Sander Relay via Baghouse (BH304)	Baghouse
EU27	REMAN Flat Line Sander via Baghouse (BH400)	Baghouse
EU28	Schilling & Bullnose Saw via Baghouse (BH401)	Baghouse
EU29	REMAN Relay via Baghouse (BH404)	Baghouse
EU30	Press Vents A, B, C, & D on Line 1 (Press 100 aka Batch Press Vent Fans)	None
EU31	Press Vents A, B, C, & D on Line 2 (Press 200 aka Continuous Press Vent Fans)	None
EU32	Boiler #1 (BOILER #1 aka Sander Dust Boiler)	None
EU33	ROEMMC Burner (ROEMMC)	None
EU34	COEN Burner (COEN)	None
EU35	Line 2 Hot Oil Heater (GEKA200)	None
EU36	Outside Truck Dump (FUG50)	None
EU37	Pile Reclaim (FUG51)	None
EU38	Radial Stacker (FUG52)	None
EU39	REMAN Facility (REMAN)	None
EU40	#1 Dryer Line 1 Natural Gas Burner (DRY-NG 100)	None

EU41	#2 Dryer Line 1 Natural Gas Burner (DRY-NG 101)	None
EU42	#3 Dryer Line 1 Natural Gas Burner (DRY-NG 102)	None
EU43	#4 Dryer Line 1 Natural Gas Burner (DRY-NG 103)	None
EU44	#1 Dryer Line 1 Natural Gas Burner (DRY-NG 200)	None
EU45	#2 Dryer Line 1 Natural Gas Burner (DRY-NG 201)	None

Section III - PERMIT CONDITIONS

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility (ARM 17.8.1211, 1212, and 1213).

A. FACILITY-WIDE

Condition	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.2	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.3	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.4	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precaution	-----
A.5	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution Construction	20%
A.6	ARM 17.8.309	Particulate Matter, Fuel-Burning Equipment	Particulate Matter	$E = 0.882 * H^{-0.1664}$ or $E = 1.026 * H^{-0.233}$
A.7	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55.0 * P^{0.11} - 40$
A.8	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.9	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.10	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-----
A.11	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000 Gallon Capacity	-----
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-----
A.13	Chapter 32 of the State of Montana Air Quality Control Implementation Plan (Chapter 4 of the Missoula City-County Air Pollution Control Program)	Missoula County's Emergency Episode Plan	Emergency Episodes	Reduce emissions in accordance with each stage of the emergency episode avoidance plan
A.14	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-----
A.15	ARM 17.8.1207	Reporting Requirements	Annual Certification	-----

Conditions

A.1. Pursuant to ARM 17.8.304(1), Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere, from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.

A.2. Pursuant to ARM 17.8.304(2), Roseburg shall not cause or authorize emissions to be discharged into

the outdoor atmosphere, from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.

- A.3. Pursuant to ARM 17.8.308(1), Roseburg shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.
- A.4. Pursuant to ARM 17.8.308(2), Roseburg shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter unless otherwise specified by rule or in this permit.
- A.5. Pursuant to ARM 17.8.308, Roseburg shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes unless otherwise specified by rule or in this permit.
- A.6. Pursuant to ARM 17.8.309, unless otherwise specified by rule or in this permit, Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel-burning equipment and new fuel-burning equipment, calculated using the following equations.

For existing fuel-burning equipment (installed before November 23, 1968): $E = 0.882 * H^{-0.1664}$

For new fuel-burning equipment (installed on or after November 23, 1968): $E = 1.026 * H^{-0.233}$

Where H is the heat input capacity in MMBtu per hour and E is the maximum allowable particulate emission rate in lbs per MMBtu.

- A.7. Pursuant to ARM 17.8.310, Roseburg shall not cause or authorize particulate matter to be discharged, from any operation, process, or activity, into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter, calculated using the following equations.

For process weight rates up to 30 tons per hour: $E = 4.10 * P^{0.67}$
For process weight rates in excess of 30 tons per hour: $E = 55.0 * P^{0.11} - 40$

Where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour.

- A.8. Pursuant to ARM 17.8.322(4), Roseburg shall not burn any liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired.
- A.9. Pursuant to ARM 17.8.322(5), Roseburg shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions unless otherwise specified by rule or in this permit.
- A.10. Pursuant to ARM 17.8.324(3), Roseburg shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1), unless otherwise as specified by rule or in this permit.
- A.11. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Roseburg shall not place, store or hold in any stationary tank, reservoir or other container of more than 65,000 gallon

capacity any crude oil, gasoline or petroleum distillate having a vapor pressure of 2.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with a vapor loss control device, properly installed, in good working order and in operation.

- A.12. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Roseburg shall not use any compartment of any single or multiple compartment oil-effluent water separator, which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.
- A.13. Roseburg shall comply with the requirements contained in Chapter 4 of the Missoula City-County Air Pollution Control Program (Chapter 32 of the State of Montana Air Quality Control Implementation Plan) with regard to emergency episodes.
- A.14. On or before January 31 and July 31 of each year, MDU shall submit to the Department the compliance monitoring reports required by Section V.D. These reports must contain all information required by Section V.D, as well as the information required by each individual emissions unit. For the reports due by January 31 of each year, MDU may submit a single report, provided that it contains all the information required by Section V.B & V.D. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

- A.15. By January 31 of each year, MDU shall submit to the Department the compliance certification report required by Section V.B. The annual certification report required by Section V.B must include a statement of compliance based on the information available that identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

Recordkeeping

- A.11. All records compiled in accordance with this permit must be maintained by Roseburg as a permanent business record for at least 5-years following the date of measurement. The records must be available at the plant site for inspection by the Department and must be submitted to the Department upon request.

Reporting

- A.12. On or before January 31 and July 31 of each year, Roseburg shall submit to the Department the compliance monitoring reports required by Section V.D of this permit. For the reports due by January 31 of each year, Roseburg may submit a single report provided that it contains all the information required by Sections V.B and V.D.
- A.13. By January 31 of each year, Roseburg shall submit to the Department the compliance certification report required by Section V.B of this permit. The annual certification report required by Section V.B of this permit must include a statement of compliance based on the information available that identifies any observed, documented, or otherwise known instances of noncompliance for each applicable requirement.

**B. PLANT-WIDE
EU1 – Plant –Wide**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
B.1, B.16, B.30, B.36	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
B.2, B.17, B.31, B.36	Line 1 Hours of Operation	8500 Hours During any Rolling 12-Month Period	Log Hours of Operation of Line 1	Monthly	Log	Semi-annual
B.3, B.18, B.32, B.36	Line 2 Production	75 MMsqft of ¾" Particle Board During any Rolling 12-Month Period	Log Line 2 Production	Monthly	Log	Semi-annual
B.4, B.19, B.33, B.36	Control Equipment	Install, Operate, and Maintain	Certify	Semi-annual	None	Semi-annual
B.5, B.20, B.33, B.36	Sander Dust Handling Systems	Enclosed and Equipped with a Baghouse	Certify	Semi-annual	None	Semi-annual
B.6, B.21, B.34, B.36	Ambient Monitoring	Conduct Ambient Monitoring as Required	Submit Ambient Air Monitoring Data	Quarterly	Data	Quarterly
B.7, B.22, B.33, B.36	Fugitive Emissions	Apply Paving or Dust Suppressant	Certify	Semi-annual	None	Semi-annual
B.8, B.23, B.33, B.36	Contaminated Floor Sweepings	Not Stored Outside	Certify	Semi-annual	None	Semi-annual
B.9, B.24, B.33, B.36	Fugitive Emissions	Plant and Maintain Vegetation on Earthen Berm	Certify	Semi-annual	None	Semi-annual
B.10, B.25, B.35, B.36	Total Particulate Emissions from the Raw Materials Storage Pile	928 lb/day and 30 ton/yr	Calculate Using Equation	Daily and Semi-annual	Records	Semi-annual
B.11, B.25, B.35, B.36	PM ₁₀ Emissions from the Raw Materials Storage Pile	334 lb/day and 9.9 ton/yr	Calculate Using Equation	Daily and Semi-annual	Records	Semi-annual
B.12, B.26, B.33, B.36	Raw Material Received and Operation of Truck Dump(s)	Keep Daily Records of Total Bone-Dry Tons of Raw Material Received	Certify	Semi-annual	Daily Records of Raw Material Received and	Semi-annual

Permit Condition	Pollutant/ Parameter	Permit Limitation	Compliance Demonstration Method	Frequency	Record-Keeping	Reporting
		and Records of Any Days When Either Truck Dump is Not Operating			Records of Each Time the Truck Dump(s) Are Not Used	
B.13, B.27, B.33, B.36	Fugitive Emissions	Install and Maintain Enclosures with Curtained Openings on the Line 2 Fire Dump and the Line 2 Reject Dump	Certify	Semi-annual	None	Semi-annual
B.14, B.28, B.33, B.36	Collection Efficiency of the Truck Dump Baghouse	Install and Maintain a Cover Over the Lift Portion of the Outside Truck Dump	Certify	Semi-annual	None	Semi-annual
B.15, B.29, B.33, B.36	Fugitive Dust Emissions	Install and Maintain a Cover Over the Reclaim Hopper	Certify	Semi-annual	None	Semi-annual

Conditions

- B.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere, from any stack or vent, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
- B.2. Line 1 shall be limited to a total of 8500 hours of operation during any rolling 12-month period (ARM 17.8.749).
- B.3. Line 2 production shall be limited to 75 million square feet (MMsqft) of 3/4-inch particleboard during any rolling 12-month period (ARM 17.8.749).
- B.4. Roseburg shall install, operate, and maintain control equipment as specified in the application for Permit #2303-07 (ARM 17.8.749).
- B.5. All sander dust-handling systems are to be enclosed and equipped with baghouse control. No outside storage of sander dust shall be allowed (ARM 17.8.749).
- B.6. Roseburg shall conduct ambient air monitoring as described in Appendix F (ARM 17.8.749).
- B.7. Paving or a dust suppressant shall be applied to all routinely used haul roads within the plant area. If a dust suppressant is used, it shall be reapplied at least once per year. Additional applications of dust suppressant may be required if fugitive dust exceeds 20% opacity at any time (ARM 17.8.308).
- B.8. Contaminated floor sweepings may not be stored outside. Material stored in the contaminated floor sweepings building shall be limited to no more than 50 units (370 cubic yards) (ARM 17.8.749).
- B.9. Roseburg shall plant and maintain vegetation on the sides and trees along the top of the earthen berm constructed around the raw material pile to reduce dust emissions. Sufficient dust control measures shall be applied to the storage pile to ensure that the visible emissions from the storage pile do not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- B.10. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 928-lb/day daily maximum and 30 ton/year for

total particulate emissions.

- B.11. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 334-lb/day daily maximum and 9.9 ton/year for PM₁₀.
- B.12. Roseburg shall keep daily records of the total bone-dry tons of raw material received at the Missoula plant. Roseburg shall also keep records of any days when either truck dump is not operating for any reason.
- B.13. Roseburg shall install and maintain enclosures with curtained openings on the Line 2 Fire Dump and the Line 2 Reject Dump to reduce fugitive emissions (ARM 17.8.749).
- B.14. Roseburg shall install and maintain a cover over the lift portion of the outside truck dump to increase the collection efficiency of the truck dump baghouse (ARM 17.8.749).
- B.15. Roseburg shall install and maintain a cover over the reclaim hopper to reduce fugitive dust emissions (ARM 17.8.749).

Compliance Demonstration

- B.16. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

If a source of excessive fugitive emissions is identified through a Method 9, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the fugitive emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.1213).

- B.17. Roseburg shall log the hours of operation of Line 1, by month, and sum the hours of operation during the previous 12 months to verify compliance with Section III.B.2 (ARM 17.8.1213).
- B.18. Roseburg shall log the production of ¾-inch particleboard from Line 2, by month, and sum the production of the particleboard during the previous 12 months to verify compliance with Section III.B.3 (ARM 17.8.1213).
- B.19. Roseburg shall semi-annually certify that the control equipment specified in the application for Permit #2303-07 is installed, operated, and maintained as required by Section III.B.4 (ARM 17.8.1213).
- B.20. Roseburg shall semi-annually certify that all sander dust-handling systems are enclosed and equipped with a baghouse as required by Section III.B.5 (ARM 17.8.1213).
- B.21. Roseburg shall continuously record NO₂, wind speed and direction, temperature, and sigma theta data as required by Attachment 1 of Permit #2303 and Section III.B.6 (See Appendix F of this permit) (ARM 17.8.1213).
- B.22. Roseburg shall semi-annually certify that all paving and dust suppressant were applied to all routinely used haul roads within the plant area at least once per year as required by Section III.B.7 (ARM 17.8.1213).
- B.23. Roseburg shall semi-annually certify that no contaminated floor sweepings were stored outside and that the amount of material stored in the contaminated floor sweepings building did not exceed 370

cubic yards at any one time as required by Section III.B.8 (ARM 17.8.1213).

- B.24. Roseburg shall semi-annually certify that vegetation has been planted and is being maintained along the earthen berm to reduce fugitive dust. Furthermore, Roseburg shall semi-annually certify that sufficient dust control measures have been applied to the storage pile to maintain the opacity from the storage pile below 20% as required by Section III.B.9 (ARM 17.8.1213).
- B.25. Roseburg shall verify compliance with the limitations specified in Section III.B.10 and III.B.11 by using the following equation (ARM 17.8.749):

$$E = 0.50 (I) (e) (0.33[1-n_{td}] + 0.33[1-n_{rs}] + 0.33[1-n_{rp}])$$

Where:

E = Total fugitive emissions from the raw material pile (lbs)

I = Total raw material delivered to plant (bone dry tons)

e = PM₁₀ emission factor of 0.36 lb/ton, or a PM emission factor of 1.0 lb/ton

n_{td} = Control efficiency at the outdoor truck dump expressed as a ratio (i.e. 99% = 0.99)

n_{rs} = Control efficiency at the radial stacker expressed as a ratio

n_{rp} = Control efficiency at the pile reclaim expressed as a ratio

Notes:

- a. The control efficiencies, as revised in Permit #2303-07, are as follows:

Description	Control Efficiency	Controls
Outdoor truck dump	99%	Covered surge bin and trailer lift with baghouse system
Pile reclaim	50%	Covered Hopper and Earthen berm
Radial stacker	50%	Reduced drop height and berm

- b. The 0.33 is utilized to account for different control efficiencies at each emission point within the process, assuming that 1/3 of the emissions originate from the truck dump, 1/3 of the emissions originate from the pile reclaim, and 1/3 of the emissions originate from the radial stacker. The constant of 0.50 at the beginning of the equation is utilized because approximately 50% of the raw material passes through the outside truck dump and the outdoor pile.
- c. If the inside truck dump is shut down, or not otherwise used for an entire day, the constant of 0.50 shall be replaced with a constant of 1.00 to determine compliance for that day.
- d. If the inside truck dump is shut down, or otherwise not used for one or more entire days, compliance with the annual average limitation shall be determined as follows:
 - i. Calculate the allowable emissions for the days when the inside truck dump is shut down, using the associated raw material delivery data and the constant of 1.00.
 - ii. Calculate the allowable emissions for the days when the inside truck dump is operated, using the associated raw material delivery data and the constant of 0.50.
 - iii. Add (i) and (ii) above.

- B.26. Roseburg shall semi-annually certify that daily records of the total bone-dry tons of raw material received at the Missoula plant have been kept as required by Section III.B.24 (ARM 17.8.1212).

- B.27. Roseburg shall semi-annually certify that the enclosures with curtained openings have been installed and

maintained on the Line 2 Fire Dump and the Line 2 Reject Dump as required by Section III.B.25 (ARM 17.8.1212).

- B.28. Roseburg shall semi-annually certify that the cover over the lift portion of the outside truck dump has been installed and maintained to increase the collection efficiency of the truck dump baghouse as required by Section III.B.15 (ARM 17.8.1212).
- B.29. Roseburg shall semi-annually certify that the cover over the reclaim hopper has been installed and maintained to reduce the fugitive dust emissions as required by Section III.B.16 (ARM 17.8.1213).

Recordkeeping

- B.30. The Method 9 Source Test Report shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.B.1 (ARM 17.8.1212).
- B.31. Roseburg shall document, by month, the hours of operation of Line 1. By the 25th of each month, Roseburg shall total the hours of operation of Line 1 during the previous 12 months to verify compliance with the limitation in Section III.B.2. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- B.32. Roseburg shall document, by month, the production of ¾-inch particleboard from Line 2. By the 25th of each month, Roseburg shall total the production of ¾-inch particleboard from Line 2 during the previous 12 months to verify compliance with the limitation in Section III.B.3. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- B.33. Recordkeeping is not required to verify compliance with Sections III.B.4, III.B.5, III.B.7, III.B.8, III.B.9, III.B.13, III.B.14, and III.B.15 (ARM 17.8.1212).
- B.34. Roseburg shall quarterly document the Ambient Air Quality data as required by Appendix F of this permit (ARM 17.8.1212).
- B.35. Roseburg shall document the calculations used in compliance with Section III.B.10 and III.B.11 (ARM 17.8.1212).

Reporting

- B.36. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.B.17;
 - b. A copy of the log demonstrating the hours of operation for Line 1;
 - c. A copy of the log demonstrating the production of ¾-inch particleboard from Line 2;
 - d. A certification that the control equipment specified in Permit Application #2303-07 is installed, operating, and being maintained;
 - e. A certification that all sander dust-handling systems are enclosed and equipped with baghouse control and that no sander dust is being stored outside;
 - f. A copy of the ambient air quality data that is required by Appendix F (if monitoring is required);
 - g. A certification that paving or dust suppressant has been applied to all routinely used haul roads within the plant area.
 - h. A certification that no contaminated floor sweepings are being stored outside and that no more than 370 cubic yards are being stored in the contaminated floor sweepings building;

- i. A certification that vegetation has been planted and is being maintained on the sides and top of the earthen berm;
- j. A summary of the fugitive total particulate emissions from the raw material storage pile (in lb/day daily maximum and ton/year);
- k. A summary of the fugitive PM₁₀ emissions from the raw material storage pile (in lb/day daily maximum and ton/year);
- l. A certification that Roseburg has kept daily records of total bone-dry tons of material received at the Missoula plant and records of any days when either truck dump has not operated;
- m. A certification that enclosures with curtain openings have been installed and are being maintained on the Line 2 Fire Dump and the Line 2 Reject Dump;
- n. A certification that a cover over the lift portion of the outside truck dump has been installed and is being maintained to increase the collection efficiency of the truck dump; and
- o. A certification that a cover over the reclaim hopper has been installed and is being maintained to reduce fugitive dust emissions.

C. DRYERS – LINE 1
EU2 - #1 Dryer Line 1 (DRY100)
EU3 - #2 Dryer Line 1 (DRY101)
EU4 - #3 Dryer Line 1 (DRY102)
EU5 - #4 Dryer Line 1 (DRY103)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
C.1, C.8, C.13, C.17	Opacity	20%	Method 9	Every 5 Years and As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	
C.2, C.4, C.9, C.14, C.17	Total Particulate Matter-DRY 100	4.9 lb/hr	Method 5	Every 5 Years	Method 5 Source Test Reports as Necessary	Semi-annual
	Total Particulate Matter-DRY 101	4.7 lb/hr				
	Total Particulate Matter-DRY 102	4.9 lb/hr				
	Total Particulate Matter-DRY 103	4.9 lb/hr				
C.3, C.5, C.10, C.14, C.17	PM ₁₀ - DRY 100	4.9 lb/hr	Method 201A	Every 5 Years	Method 201A Source Test Reports as Necessary	Semi-annual
	PM ₁₀ - DRY 101	4.7 lb/hr				
	PM ₁₀ - DRY 102	4.9 lb/hr				
	PM ₁₀ - DRY 103	4.9 lb/hr				
C.6, C.11, C.15, C.17	Particulate Emissions	Operate and Maintain Multiclones	Certify	Semi-annual	None	Semi-annual
C.7, C.12, C.16, C.17	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	Certify	Semi-annual	None	Semi-annual

Conditions

- C.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.752).
- C.2. Emissions of total particulate matter from DRY100, DRY102, and DRY103 shall each be limited to a maximum of 4.9 lb/hr (ARM 17.8.749).
- C.3. Emissions of total particulate matter from DRY 101 shall be limited to a maximum of 4.7 lb/hr (ARM 17.8.749).
- C.4. Emissions of PM₁₀ from DRY100, DRY102, and DRY103 shall each be limited to a maximum of 4.9 lb/hr (ARM 17.8.749).
- C.5. Emissions of PM₁₀ from DRY101 shall be limited to a maximum of 4.7 lb/hr (ARM 17.8.749).
- C.6. Each dryer (DRY100, DRY101, DRY102, and DRY103) shall be equipped with multiclone control that is operated and maintained to meet the appropriate emission limit as specified in Sections III.C.2, III.C.3, III.C.4, and III.C.5 (ARM 17.8.752).
- C.7. Roseburg shall install and operate temperature sensors at the inlet of DRY100, DRY101, DRY102, and DRY103. The temperature sensors shall have a remote readout and audible alarm. The alarm system shall be audible to the dryer operator and the operator(s) of all three combustion units. The alarm system shall become activated when exhaust gas exceeds 475°F. Data from the temperature sensors shall be maintained for a period of at least 5 years and shall be available to the Department upon request (ARM 17.8.749).

Compliance Demonstration

- C.8. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance monitoring, Roseburg shall conduct weekly visual surveys on the visible emissions from the combined stack, which vents DRY100, DRY101, DRY102, and DRY103, and may vent BH200 and BH201, if Roseburg chooses to vent the baghouses through the combined stack. In addition, Roseburg shall conduct Method 9 visual emission observations 1) on an every 5-year basis, 2) as required by the Department, and 3) if a visual survey indicates visible emissions. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey the combined stack emissions of the above listed emitting units (DRY100, DRY101, DRY102, and DRY103, and BH200 and BH201, if Roseburg chooses to vent the baghouses through the combined stack) for any visible emissions. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of visible emissions is identified during the weekly visual survey, Roseburg shall conduct a Method 9 visual emission observation on the source if the conditions satisfy Method 9 requirements (ARM 17.8.106 and ARM 17.8.1213).

- C.9. Roseburg shall conduct EPA Method 5 source testing on the combined stack emissions of DRY100, DRY101, DRY102, and DRY103, and BH200 and BH201, if Roseburg chooses to vent the baghouses

through the combined stack, to determine the total particulate matter emissions from the stack. The test results shall be used to monitor compliance with the sum total particulate matter mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The testing and compliance monitoring of the combined stack emissions shall take place at least once every 5 years or according to another testing/monitoring schedule as may be approved by the Department. Source testing that is conducted without all sources vented to the combined stack will not relieve Roseburg of complying with the source testing frequency for each of those individual units not venting to the combined stack during the time of the test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual. The Department may require additional testing (ARM 17.8.1213).

- C.10 Roseburg shall conduct EPA Method 201A source testing on the combined stack emissions of DRY100, DRY101, DRY102, and DRY103, and BH200 and BH201, if Roseburg chooses to vent the baghouses through the combined stack, to determine the PM₁₀ emissions from the stack. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The test results shall be used to monitor compliance with the sum total PM₁₀ mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The testing and compliance monitoring of the combined stack emissions shall take place at least once every 5 years or according to another testing/monitoring schedule as may be approved by the Department. Source testing that is conducted without all sources vented to the combined stack will not relieve Roseburg of complying with the source testing frequency for each of those individual units not venting to the combined stack during the time of the test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual. The Department may require additional testing (ARM 17.8.1213).
- C.11. Roseburg shall semi-annually certify that the multiclones are operated and maintained on each dryer to meet the emission limits as specified in Section III.C.2, III.C.3, III.C.4, and III.C.5 (ARM 17.8.1213).
- C.12. Roseburg shall semi-annually certify that the temperature sensors are installed and operated at the inlet of DRY100, DRY101, DRY102, and DRY103. Roseburg shall also semi-annually certify that the temperature sensors have a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units. Furthermore, Roseburg shall semi-annually certify that the alarm system is operational and programmed to activate if the dryer inlet temperature exceeds 475°F. (ARM 17.8.1213)

Recordkeeping

- C.13. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.C.8. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- C.14. The Method 5 and Method 201A Source Test Reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.1212).
- C.15. Recordkeeping is not required to verify compliance with Section III.C.6 (ARM 17.8.1212).
- C.16. Although recordkeeping is not required to verify compliance with most of the conditions stated in Section III.C.7, data from the temperature sensors shall be maintained for a period of at least 5-years and shall be available to the Department upon request (ARM 17.8.749).

Reporting

- C.17. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- A summary of the results of any Method 9 Source Tests that are conducted during the reporting period;
 - A summary of any corrective actions taken as a result of the weekly visual surveys;
 - A summary of the results of any Method 5 Source Tests that are conducted during the reporting period;
 - A summary of the results of any Method 201A Source Tests that are conducted during the reporting period;
 - A certification that multiclone control has been operated and maintained on each dryer; and
 - A certification that temperature sensors have been installed and operated at the inlet of DRY100, DRY101, DRY102, and DRY103 as specified in Section III.C.7.

Alternative Operating Scenario

In any circumstances where Roseburg is unable to monitor compliance with the emission limits identified in Section III.C, Roseburg may, at its discretion, disconnect the combined stack to isolate the individual emission sources and identify the source of the emissions leading to the exceedance. In such circumstances, Roseburg shall correct the problems and re-attach the stack within no more than 60 days after discovering the exceedance. However, if Roseburg determines, and the Department agrees, that it is the combined stack itself that is causing or contributing to the exceedance, Roseburg shall leave the combined stack unattached, thus venting each source as originally designed. Roseburg will then have 60 days to submit to the Department for approval another alternative to address the issue of opacity compliance monitoring for the Line 1 Dryers. Roseburg will not be required to vent those sources to the combined stack if such venting would result in, or risk resulting in, a violation of any permit term or condition. This alternative operating scenario is meant to allow for Roseburg to isolate any source that may be responsible for an exceedance of a permit condition. This alternative operating scenario does not relieve Roseburg of the liability for a violation of the emission limits identified in Section III.C.

D. DRYERS – LINE 2
EU6 - #1 Dryer Line 2 (DRY200) aka #5 Dryer
EU7 - #2 Dryer Line 2 (DRY201) aka #6 Dryer

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
D.1, D.7, D.13, D.18	Opacity	20%	Method 9 (with unique vertical stack for each dryer such that legal Method 9 tests can be conducted)	Every 5-Years and as Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	
D.2, D.8, D.14, D.18	Total Particulate Matter	6.0 lb/hr	Method 5	Every 5-Years	Method 5 Source Test Reports as Necessary	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
D.3, D.9, D.14, D.18	PM ₁₀	6.0 lb/hr	Method 201A	Every 5-Years	Method 201A Source Test Reports as Necessary	Semi-annual
D.4, D.10, D.15, D.18	Particulate Emissions	Operate and Maintain Multiclones	Certify	Semi-annual	None	Semi-annual
D.5, D.11, D.16, D.18	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	Certify	Semi-annual	None	Semi-annual
D.6, D.12, D.17, D.18	Combined Production	168,000 BDT per Rolling 12-Month Period	Log Production, Sum Results, and Compare to Limit.	Monthly	Log	Semi-annual

Conditions

- D.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.752).
- D.2. Emissions of total particulate matter from DRY200 and DRY201 shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- D.3. Emissions of PM₁₀ from DRY200 and DRY201 shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- D.4. Each dryer shall be equipped with multiclone control that is operated and maintained to meet the emission limits specified in Section III.D.2 and III.D.3 (ARM 17.8.752).
- D.5. Roseburg shall install and operate a temperature sensor at the inlet of each of DRY200 and DRY201. The temperature sensors shall have a remote readout and audible alarm. The alarm system shall be audible to the dryer operator and the operator(s) of all three combustion units. The alarm system shall become activated when exhaust gas exceeds 475°F. Data from the temperature sensors shall be maintained for a period of at least 5-years and shall be available to the Department upon request (ARM 17.8.749).
- D.6. The combined production from DRY200 and DRY201 shall not exceed 168,000 BDT per rolling 12-month period (ARM 17.8.749).

Compliance Demonstration

- D.7. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible

emissions on DRY200 and DRY201 and Method 9 VEOs every 5-years and as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- D.8. Roseburg shall conduct source testing on DRY200 and DRY201 for total particulate matter using EPA Method 5 to monitor compliance with the limitations contained in Section III.D.2. The testing and compliance demonstration shall take place at least once every 5-years for each unit, or according to another testing/monitoring schedule as may be approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- D.9. Roseburg shall conduct source testing on DRY200 and DRY201 for PM₁₀ using EPA Method 201A to monitor compliance with the limitations contained in Section III.D.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The testing and compliance demonstration shall take place at least once every 5-years for each unit, or according to another testing/monitoring schedule as may be approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- D.10. Roseburg shall semi-annually certify that the multiclones are installed and maintained on the dryers to meet the emission limits as required by Section III.D.4 (ARM 17.8.1213).
- D.11. Roseburg shall semi-annually certify that the temperature sensors are installed and operated at the inlet of DRY200 and DRY201. Roseburg shall also semi-annually certify that the temperature sensors have a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units. Furthermore, Roseburg shall semi-annually certify that the alarm system is operational and programmed to activate if the dryer inlet temperature exceeds 475°F (ARM 17.8.1213).
- D.12. Compliance with the combined production limit may be demonstrated by logging and summing the production from DRY200 and DRY201 and keeping the combined production below 168,000 BDT per rolling 12-month period (ARM 17.8.1213).

Recordkeeping

- D.13. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.D.7. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- D.14. The Method 5 and Method 201A Source Test Reports shall be submitted in accordance with the

Montana Source Test Protocol and Procedures Manual (ARM 17.8.1212).

- D.15. Recordkeeping is not required to verify compliance with Section III.D.10 (ARM 17.8.1212).
- D.16. Although recordkeeping is not required to verify compliance with most of the conditions stated in Section III.D.5, data from the temperature sensors shall be maintained for a period of at least 5-years and shall be available to the Department upon request (ARM 17.8.749).
- D.17. Roseburg shall document, by month, the combined production from DRY200 and DRY201. By the 25th of each month, Roseburg shall total the combined production from the two dryers during the previous 12 months to verify compliance with the limitation in Section III.D.6. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).

Reporting

- D.18. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are conducted during the reporting period;
 - d. A summary of the results of any Method 201A Source Tests that are conducted during the reporting period;
 - e. A certification that multiclone control has been operated and maintained on the dryer;
 - f. A certification that a temperature sensor has been installed and operated at the inlet of DRY200 and DRY201 as specified in Section III.D.5; and
 - g. A copy of the log summarizing the combined production of material from DRY200 and DRY201 during the reporting period.

E. PREDRYERS
EU8 - #1 Predryer (DRY500)
EU9 - #2 Predryer (DRY501)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
E.1, E.7, E.13, E.18	Opacity	20%	Method 9	Every 5-Years and as Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	
E.2, E.8, E.14, E.18	Total Particulate Matter	6.0 lb/hr	Method 5	Every 5-years	Method 5 and Source Test Reports as Necessary	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
E.3, E.9, E.14, E.18	PM ₁₀	6.0 lb/hr	Method 201A	Every 5-years	Method 201A Source Test Reports as Necessary	Semi-annual
E.4, E.10, E.15, E.18	Particulate Emissions	Operate and Maintain Multiclones	Certify	Semi-annual	None	Semi-annual
E.5, E.11, E.16, E.18	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	Certify	Semi-annual	None	Semi-annual
E.6, E.12, E.17, E.18	Combined Production	35,000 BDT per Rolling 12-Month Period	Log Production, Sum Results, and Compare to Limit.	Monthly	Log	Semi-annual

Conditions

- E.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.752).
- E.2. Emissions of total particulate matter from DRY500 and DRY501 shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- E.3. Emissions of PM₁₀ from DRY500 and DRY501 shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- E.4. Each predryer shall be equipped with multiclone control that is operated and maintained to meet the emission limits specified in Section III.E.2 and III.E.3 (ARM 17.8.752).
- E.5. Roseburg shall install and operate a temperature sensor at the inlet of DRY500 and DRY501. The temperature sensors shall have a remote readout and audible alarm. The alarm system shall be audible to the dryer operator and the operator(s) of all three combustion units. The alarm system shall become activated when exhaust gas exceeds 475°F. Data from the temperature sensors shall be maintained for a period of at least 5 years and shall be available to the Department upon request (ARM 17.8.749).
- E.6. The combined production from DRY500 and DRY501 shall not exceed 35,000 BDT per rolling 12-month period (ARM 17.8.749).

Compliance Demonstration

- E.7. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions

on the DRY500 and DRY501 and Method 9 VEOs every 5-years and as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.1213).

- E.8. Roseburg shall conduct source testing on DRY500 and DRY501 for total particulate matter using EPA Method 5 to monitor compliance with the limitations contained in Section III.E.2. The testing and compliance demonstration shall take place at least once every 5-years for each unit, or according to another testing/monitoring schedule as may be approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- E.9. Roseburg shall conduct source testing on DRY500 and DRY501 for PM₁₀ using EPA Method 201A to monitor compliance with the limitations contained in Section III.E.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The testing and compliance demonstration shall take place at least once every 5-years for each unit, or according to another testing/monitoring schedule as may be approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- E.10. Roseburg shall semi-annually certify that the multiclones are installed and maintained on DRY500 and DRY501, as required by Section III.E.4 (ARM 17.8.1213).
- E.11. Roseburg shall semi-annually certify that the temperature sensors are installed and operated at the inlet of DRY500 and DRY501. Roseburg shall also semi-annually certify that the temperature sensors have a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units. Furthermore, Roseburg shall semi-annually certify that the alarm system is operational and programmed to activate if the dryer inlet temperature exceeds 475°F (ARM 17.8.1213).
- E.12. Compliance with the combined production limit may be demonstrated by logging and summing the production from DRY500 and DRY501 and keeping the combined production below 35,000 BDT per rolling 12-month period (ARM 17.8.1213).

Recordkeeping

- E.13. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.E.7. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- E.14. The Method 5 and Method 201A Source Test Reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.1212).

- E.15. Recordkeeping is not required to verify compliance with Section III.E.10 (ARM 17.8.1212).
- E.16. Although recordkeeping is not required to verify compliance with most of the conditions stated in Section III.E.5, data from the temperature sensors shall be maintained for a period of at least 5-years and shall be available to the Department upon request (ARM 17.8.749).
- E.17. Roseburg shall document, by month, the combined production from DRY500 and DRY501. By the 25th of each month, Roseburg shall total the combined production from DRY500 and DRY501 during the previous 12 months to verify compliance with the limitation in Section III.E.6. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).

Reporting

- E.18. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are conducted during the reporting period;
 - d. A summary of the results of any Method 201A Source Tests that are conducted during the reporting period;
 - e. A certification that multiclone control has been operated and maintained on the dryer;
 - f. A certification that a temperature sensor has been installed and operated at the inlet of DRY500 and DRY501 as specified in Section III.E.5; and
 - g. A copy of the log summarizing the combined production of material from DRY500 and DRY501 during the reporting period.

**F. OUTSIDE TRUCK DUMP LINE 1
EU10 – Outside Truck Dump Line 1 via Baghouse (BH50)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
F.1, F.5, F.9, F.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
F.2, F.6, F.10, F.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
F.3, F.7, F.10, F.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
F.4, F.8, F.10, F.11	Flow Rate	27470 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
					Reports as Necessary	

Conditions

- F.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- F.2. Emissions of Total Particulate from BH50 shall not exceed 0.005 grains per dry standard cubic foot (gr/dscf) of exhaust gas (ARM 17.8.749).
- F.3. Emissions of PM₁₀ from BH50 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- F.4. The flowrate through BH50 shall not exceed 27470 cubic feet per minute (cfm) (ARM 17.8.749).

Compliance Demonstration

- F.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH50 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, ARM 17.8.1213).

- F.6. Roseburg shall perform Method 5 Source Tests as required by the Department to monitor compliance with Section III.F.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- F.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.F.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional

testing (ARM 17.8.1213).

- F.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.F.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- F.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.F.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- F.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.F.2, III.F.3, and III.F.4, as required (ARM 17.8.1212).

Reporting

- F.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period, as required by Section III.F.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Test(s) that are required by the Department;
 - d. A summary of the results of any Method 201A Test(s) that are required by the Department; and
 - e. A summary of the results of any Method 2 Test(s) that are required by the Department.

**G. MILLING AND DRYING
EU11 – Milling and Drying via Baghouse (BH55)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
G.1, G.6, G.11, G.14	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
G.2, G.7, G.12, G.14	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
G.3, G.8, G.12, G.14	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
G.4, G.9, G.12, G.14	Flow Rate	18000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
					Necessary	
G.5, G.10, G.13, G.14	Baghouse	Install, operate, and maintain	Verify	Semi-annual	None	Semi-annual

Conditions

- G.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- G.2. Emissions of Total Particulate from the BH55 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- G.3. Emissions of PM₁₀ from BH55 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- G.4. The flowrate through BH55 shall not exceed 18000 cfm (ARM 17.8.749).
- G.5. Roseburg shall install, operate, and maintain a baghouse to control emissions from the three dryer loop vents and the coarse refiner loop vent in Milling and Drying (ARM 17.8.749).

Compliance Demonstration

- G.6. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH55 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- G.7. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.G.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

- G.8. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.G.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- G.9. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.G.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- G.10. Roseburg shall semi-annually certify that a baghouse to control emissions from the three dryer loop vents and the coarse refiner loop vent in Milling and Drying has been installed, is operating, and is being maintained (ARM 17.8.1213).

Recordkeeping

- G.11. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.G.6. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- G.12. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.G.2, III.G.3, and III.G.4, as required (ARM 17.8.1212).
- G.13. Recordkeeping is not required to verify compliance with Section III.G.5 (ARM 17.8.1212).

Reporting

- G.14. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.G.6;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Test(s) that are required by the Department;
 - d. A summary of the results of any Method 201A Source Test(s) that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**H. REJECT SYSTEM LINE 1
EU12 – Reject System Line 1 via Baghouse (BH100)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
H.1, H.5, H.9, H.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
H.2, H.6, H.10, H.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
H.3, H.7, H.10, H.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
H.4, H.8, H.10, H.11	Flow Rate	40000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- H.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- H.2. Emissions of Total Particulate from BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- H.3. Emissions of PM₁₀ from BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- H.4. The flowrate through BH100 shall not exceed 40000 cfm (ARM 17.8.749).

Compliance Demonstration

- H.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH100 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- H.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.H.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- H.7. Roseburg shall perform a Method 201A Source Test to monitor compliance with Section III.H.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- H.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.H.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- H.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.H.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- H.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.H.2, III.H.3, and III.H.4, as required (ARM 17.8.1212).

Reporting

- H.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. The results of any Method 9 Source Tests conducted during the reporting period as required by Section III.H.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**I. REJECT SYSTEM RELAY LINE 1
EU13 – Reject System Relay Line 1 via Baghouse (BH101)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
I.1, I.5, I.9, I.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
I.2, I.6, I.10, I.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
I.3, I.7, I.10, I.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
I.4, I.8, I.10, I.11	Flow Rate	3000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- I.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- I.2. Emissions of Total Particulate from BH101 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- I.3. Emissions of PM₁₀ from BH101 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- I.4. The flowrate through BH101 shall not exceed 3000 cfm (ARM 17.8.749).

Compliance Demonstration

- I.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH101 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- I.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.I.2. The source tests shall conform to the requirements of the Montana Source Test

Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

- I.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.I.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- I.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.I.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- I.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.I.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- I.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.I.2, III.I.3, and III.I.4, required (ARM 17.8.1212).

Reporting

- I.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. The results of any Method 9 Source Tests conducted during the reporting period as required by Section III.I.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

J. BOARD TRIM SYSTEMS
EU14 – Board Trim System 5x25 via Baghouse (BH102)
EU15 – Board Trim System 5x16 via Baghouse (BH103)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
J.1, J.5, J.9, J.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	
J.2, J.6, J.10, J.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
J.3, J.7, J.10, J.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
					Necessary	
J.4, J.8, J.10, J.11	Flow Rate	28800 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- J.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- J.2. Emissions of Total Particulate from BH102 and BH103 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- J.3. Emissions of PM₁₀ from BH102 and BH103 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- J.4. The flowrate through BH102 and BH103 shall each not exceed 28800 cfm (ARM 17.8.749).

Compliance Demonstration

- J.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH102 and BH103 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106. and ARM 17.8.1213).

- J.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.J.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

- J.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.J.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- J.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.J.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- J.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.J.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- J.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.J.2, III.J.3, and III.J.4, as required (ARM 17.8.1212).

Reporting

- J.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.J.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**K. CORE AND FACE AIR SYSTEMS LINE 2
EU16 – Core Air System Line 2 via Baghouse (BH200)
EU17 – Face Air System Line 2 via Baghouse (BH201)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
K.1, K.5, K.9, K.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
K.2, K.6 K.10, K.11	Total Particulate	0.005 gr/dscf and 1.14 lb/hr	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
K.3, K.7,	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the	Method 201A Source Test	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
K.10, K.11		and 1.14 lb/hr		Department	Reports as Necessary	
K.4, K.8, K.10, K.11	Flow Rate	26680 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- K.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- K.2. Emissions of Total Particulate from BH200 and BH201 shall each not exceed 0.005 gr/dscf of exhaust gas and 1.14 lb/hr (ARM 17.8.749).
- K.3. Emissions of PM₁₀ from BH200 and BH201 shall each not exceed 0.005 gr/dscf of exhaust gas and 1.14 lb/hr (ARM 17.8.749).
- K.4. The flowrate through BH200 and BH201 shall each not exceed 26680 cfm (ARM 17.8.749).

Compliance Demonstration

- K.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions from BH200 and BH201 and Method 9 VEOs, either individually or vented through the combined stack with DRY100, DRY101, DRY102, and DRY103, as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any visible emissions (either from the individual baghouses or the combined stack, as appropriate). The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of visible emissions is identified, Roseburg shall conduct a Method 9 visual emission observation on the source (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- K.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.K.2. If the source test is conducted while BH200 and BH201 are vented through the combined stack in conjunction with DRY100, DRY101, DRY102, and DRY103 (see Section III.C),

the test results shall be used to monitor compliance with the sum total particulate mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

- K.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.K.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. If the source test is conducted while BH200 and BH201 are vented through the combined stack in conjunction with DRY100, DRY101, DRY102, and DRY103 (see Section III.C), the test results shall be used to monitor compliance with the sum total PM₁₀ mass emission limits of all of the operating sources vented to the combined stack at the time of the compliance source test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- K.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.K.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- K.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.K.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- K.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.K.2, III.K.3, and III.K.4, as required (ARM 17.8.1212).

Reporting

- K.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.K.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

Alternative Operating Scenario

In any circumstances where Roseburg is unable to demonstrate compliance with the emission limits identified in Section III.K, Roseburg may, at its discretion, disconnect the combined stack to isolate the individual emission sources and identify the source of the emissions leading to the exceedance. In such circumstances, Roseburg shall correct the problems and re-attach the stack within no more than 60 days after discovering the exceedance. However, if Roseburg determines, and the Department agrees, that it is the combined stack itself that is causing or contributing to the exceedance, Roseburg shall leave the combined stack unattached, thus venting each source as originally designed. Roseburg

will then have 60 days to submit to the Department for approval another alternative to address this issue. Roseburg will not be required to vent those sources to the combined stack if such venting would result in, or risk resulting in, a violation of any permit term or condition. This alternative operating scenario is meant to allow for Roseburg to isolate any source that may be responsible for an exceedance of a permit condition. This alternative operating scenario does not relieve Roseburg of the liability for a violation of the emission limits identified in Section III.K (ARM 17.8.1212).

L. MATERIAL AND BOARD TRIM SYSTEMS LINE 2
EU18 – Material Trim System Line 2 via Baghouse (BH202 aka Line 2 Press Line Baghouse)
EU19 – Board Trim System Line 2 via Baghouse (BH203 aka Line 2 Sawline Baghouse)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
L.1, L.5, L.9, L.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
L.2, L.6, L.10, L.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
L.3, L.7, L.10, L.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
L.4, L.8, L.10, L.11	Flow Rate	30000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- L.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- L.2. Emissions of Total Particulate from BH202 and BH203 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- L.3. Emissions of PM₁₀ from BH202 and BH203 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- L.4. The flowrate through BH202 and BH203 shall each not exceed 30000 cfm (ARM 17.8.749).

Compliance Demonstration

- L.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH202 and BH203 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- L.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.L.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- L.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.L.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- L.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.L.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- L.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.L.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- L.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.L.2, III.L.3, and III.L.4, as required (ARM 17.8.1212).

Reporting

- L.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.L.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department;and

e. A summary of the results of any Method 2 Source Tests that are required by the Department.

M. LINE 2 RELAY

EU20 – Line 2 Relay via Baghouse (BH204 aka Line 2 Receiver Baghouse)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
M.1, M.5, M.9, M.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
M.2, M.6, M.10, M.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
M.3, M.7, M.10, M.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
M.4, M.8, M.10, M.11	Flow Rate	8000 cfm	Method 2	As required by the Department	Method 2 source test reports as necessary	Semi-annual

Conditions

- M.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- M.2. Emissions of Total Particulate from BH204 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- M.3. Emissions of PM₁₀ from BH204 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- M.4. The flowrate through BH204 shall not exceed 8000 cfm (ARM 17.8.749).

Compliance Demonstration

- M.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH204 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- M.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.M.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- M.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.M.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- M.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.M.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- M.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.M.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted to the Department, upon request, in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1213).
- M.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.M.2, III.M.3, and III.M.4, as required (ARM 17.8.1213).

Reporting

- M.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.M.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

N. SIX HEAD SANDER
EU21 – Six Head Sander via Baghouse (BH300A)
EU22 – Six Head Sander via Baghouse (BH300B)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
N.1, N.5, N.9, N.11	Opacity	20%	Method 9	As required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
N.2, N.6, N.10, N.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
N.3, N.7, N.10, N.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
N.4, N.8, N.10, N.11	Flow Rate	26000 cfm each	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- N.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- N.2. Emissions of Total Particulate from BH300A and BH300B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- N.3. Emissions of PM₁₀ from BH300A and BH300B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- N.4. The flowrate through BH300A and BH300B shall each not exceed 26000 cfm (ARM 17.8.749).

Compliance Demonstration

- N.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH300A and BH300B and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with

Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- N.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.N.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- N.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.N.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- N.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.N.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing.

Recordkeeping

- N.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.N.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- N.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.N.2, III.N.3, and III.N.4, as required (ARM 17.8.1212).

Reporting

- N.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.N.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

O. SIX HEAD AND REMAN FLAT LINE RELAY EU23 – Six Head & REMAN Flat Line Relay via Baghouse (BH301)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
O.1, O.5, O.9, O.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
O.2, O.6, O.10, O.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
O.3, O.7, O.10, O.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
O.4, O.8, O.10, O.11	Flow Rate	4000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- O.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- O.2. Emissions of Total Particulate from BH301 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- O.3. Emissions of PM₁₀ from BH301 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- O.4. The flowrate through BH301 shall not exceed 4000 cfm (ARM 17.8.749).

Compliance Demonstration

- O.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH301 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions.

Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- O.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.O.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- O.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.O.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- O.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.O.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- O.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.O.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- O.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.O.2, III.O.3, and III.O.4, as required (ARM 17.8.1212).

Reporting

- O.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.O.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

- P. EIGHT HEAD SANDER**
 - EU24 – Eight Head Sander via Baghouse (BH302)**
 - EU25 – Eight Head Sander via Baghouse (BH303)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
P.1, P.5, P.9, P.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
P.2, P.6, P.10, P.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
P.3, P.7, P.10, P.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
P.4, P.8, P.10, P.11	Flow Rate	47000 cfm each	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- P.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- P.2. Emissions of Total Particulate from BH302 and BH303 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- P.3. Emissions of PM₁₀ from BH302 and BH303 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- P.4. The flowrate through BH302 and BH303 shall each not exceed 47000 cfm (ARM 17.8.749).

Compliance Demonstration

- P.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH302 and BH303 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions.

Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- P.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.P.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213)
- P.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.P.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- P.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.P.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- P.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.P.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log.
- P.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.P.2, III.P.3, and III.P.4, as required (ARM 17.8.1213).

Reporting

- P.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.P.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department

**Q. EIGHT HEAD SANDER RELAY
EU26 – Eight Head Sander Relay via Baghouse (BH304)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
Q.1, Q.5, Q.9, Q.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual surveys	Weekly	Log	Semi-annual
Q.2, Q.6, Q.10, Q.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
Q.3, Q.7, Q.10, Q.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
Q.4, Q.8, Q.10, Q.11	Flow Rate	10000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- Q.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- Q.2. Emissions of Total Particulate from BH304 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- Q.3. Emissions of PM₁₀ from BH304 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- Q.4. The flowrate through BH304 shall not exceed 10000 cfm (ARM 17.8.749).

Compliance Demonstration

- Q.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH304 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions.

Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- Q.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.Q.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- Q.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.Q.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- Q.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.Q.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- Q.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.Q.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- Q.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.Q.2, III.Q.3, and III.Q.4, as required (ARM 17.8.1212).

Reporting

- Q.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.Q.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**R. REMAN FLAT LINE SANDER
EU27 – REMAN Flat Line Sander via Baghouse (BH400)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
R.1, R.5, R.9, R.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
R.2, R.6, R.10, R.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
R.3, R.7, R.10, R.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
R.4, R.8, R.10, R.11	Flow Rate	20000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- R.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- R.2. Emissions of Total Particulate from BH400 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- R.3. Emissions of PM₁₀ from BH400 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- R.4. The flowrate through BH400 shall not exceed 20000 cfm (ARM 17.8.749).

Compliance Demonstration

- R.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH400 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use

water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- R.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.R.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- R.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.R.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- R.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.R.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- R.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.R.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- R.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.R.2, III.R.3, and III.R.4, as required (ARM 17.8.1212).

Reporting

- R.11. The reports required by Conditions A.12 and A.132 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Test that are conducted during the reporting period as required by Section III.R.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**S. SCHILLING AND BULLNOSE SAW
EU28 – Schilling & Bullnose Saw via Baghouse (BH401)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
S.1, S.5, S.9, S.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
S.2, S.6, S.10, S.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
S.3, S.7, S.10, S.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
S.4, S.8, S.10, S.11	Flow Rate	27000 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- S.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- S.2. Emissions of Total Particulate from BH401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- S.3. Emissions of PM₁₀ from BH401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- S.4. The flowrate through BH401 shall not exceed 27000 cfm (ARM 17.8.749).

Compliance Demonstration

- S.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH401 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions.

Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, ARM 17.8.1213).

- S.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.S.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (Arm 17.8.1213).
- S.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.S.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (Arm 17.8.1213).
- S.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.S.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- S.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.S.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- S.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.S.2, III.S.3, and III.S.4, as required (ARM 17.8.1212).

Reporting

- S.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.S.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**T. REMAN RELAY
EU29 – REMAN Relay via Baghouse (BH404)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration Method	Frequency	Record-keeping	Reporting
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Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
T.1, T.5, T.9, T.11	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
T.2, T.6, T.10, T.11	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
T.3, T.7, T.10, T.11	PM ₁₀	0.005 gr/dscf	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual
T.4, T.8, T.10, T.11	Flow Rate	1700 cfm	Method 2	As Required by the Department	Method 2 Source Test Reports as Necessary	Semi-annual

Conditions

- T.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- T.2. Emissions of Total Particulate from BH404 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- T.3. Emissions of PM₁₀ from BH404 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- T.4. The flowrate through BH404 shall not exceed 1700 cfm (ARM 17.8.749).

Compliance Demonstration

- T.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on BH404 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use

water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- T.6. Roseburg shall perform a Method 5 Source Test as required by the Department to monitor compliance with Section III.T.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- T.7. Roseburg shall perform a Method 201A Source Test as required by the Department to monitor compliance with Section III.T.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- T.8. Roseburg shall perform a Method 2 Source Test as required by the Department to monitor compliance with Section III.T.4. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- T.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.T.5. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- T.10. The Method 2, Method 5, and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.T.2, III.T.3, and III.T.4, as required (Arm 17.8.1212).

Reporting

- T.11. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.T.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department; and
 - e. A summary of the results of any Method 2 Source Tests that are required by the Department.

**U. PRESS VENTS ON LINE 1
EU30 – Press Vents A, B, C, and D on Line 1 (Press 100 aka Batch Press Vent Fans)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
U.1, U.4, U.7, U.9	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
U.2, U.5, U.8, U.9	Total Particulate	8.0 lb/hr (cumulative)	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
U.3, U.6, U.8, U.9	PM ₁₀	8.0 lb/hr (cumulative)	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual

Conditions

- U.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- U.2. Press Vents A, B, C, and D on Line 1 shall cumulatively be limited to 8.0 lb/hr of total particulate emissions for all four stacks (ARM 17.8.749).
- U.3. Press Vents A, B, C, and D on Line 1 shall cumulatively be limited to 8.0 lb/hr of PM₁₀ emissions for all four stacks (ARM 17.8.749).

Compliance Demonstration

- U.4. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on Press Vents A, B, C, and D on Line 1 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- U.5. Roseburg shall perform Method 5 Source Test(s) as required by the Department to monitor compliance with Section III.U.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- U.6. Roseburg shall perform Method 201A Source Test(s) as required by the Department to monitor compliance with Section III.U.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis (“back-half”) is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- U.7. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.U.4. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- U.8. The Method 5 and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.U.2 and III.U.3, as required (ARM 17.8.1212).

Reporting

- U.9. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.U.4;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department; and
 - d. A summary of the results of any Method 201A Tests that are required by the Department.

**V. PRESS VENTS ON LINE 2
EU31 – Press Vents A, B, C, & D on Line 2 (Press 200 aka Continuous Press Vent Fans)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-keeping	Reporting
			Method	Frequency		
V.1, V.4, V.7, V.9	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
V.2, V.5, V.8, V.9	Total Particulate	6.5 lb/hr (cumulative)	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
V.3, V.6, V.8, V.9	PM ₁₀	6.5 lb/hr (cumulative)	Method 201A	As Required by the Department	Method 201A Source Test Reports as Necessary	Semi-annual

Conditions

- V.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from

any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).

- V.2. Press Vents A, B, C, & D on Line 2 shall be limited to 6.5 lb/hr of total particulate for all four stacks (ARM 17.8.749).
- V.3. Press Vents A, B, C, & D on Line 2 shall be limited to 6.5 lb/hr of PM₁₀ for all four stacks (ARM 17.8.749).

Compliance Demonstration

- V.4. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on Press Vents A, B, C, and D and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- V.5. Roseburg shall perform Method 5 Source Test(s) as required by the Department to monitor compliance with Section III.V.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- V.6. Roseburg shall perform Method 201A Source Test(s) as required by the Department to monitor compliance with Section III.V.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis ("back-half") is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).

Recordkeeping

- V.7. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.V.4. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- V.8. The Method 5 and Method 201A Source Test Report(s) shall be completed in accordance with the

Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.V.2 and III.V.3, as required (ARM 17.8.1212).

Reporting

- V.9. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.V.4;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department; and
 - d. A summary of the results of any Method 201A Source Tests that are required by the Department.

**W. BOILER
EU32 – Boiler #1 (BOILER#1 aka Sander Dust Boiler)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
W.1, W.6, W.11, W.14	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Report as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
W.2, W.7, W.12, W.14	Total Particulate	19.8 lb/hr	Method 5	As Required by the Department	Method 5 Source Test Report as Necessary	Semi-annual
W.3, W.8, W.12, W.14	PM ₁₀	19.8 lb/hr	Method 201A	As Required by the Department	Method 201A Source Test Report as Necessary	Semi-annual
W.4, W.9, W.13, W.14	Electric Eye Monitor	Installed in Ash Separator Junction of the Sander Dust Boiler Stack	Certify	Semi-annual	None	Semi-annual
W.5, W.10, W.13, W.14	Opacity Monitor	Install and Operate (potentially required)	Certify (if required to install by the Department)	Semi-annual	None	Semi-annual

Conditions

- W.1. Roseburg shall not cause or authorize to be discharged into the outdoor atmosphere, from the sander dust abort stack, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- W.2. Particulate emissions from the sander dust boiler shall not exceed 19.8 lb/hr of total particulate when venting from the sander dust boiler abort stack (ARM 17.8.749).
- W.3. Particulate emissions from the sander dust boiler shall not exceed 19.8 lb/hr of PM₁₀ when venting from the sander dust boiler abort stack (ARM 17.8.749).
- W.4. An electric eye monitor, similar to those used in incinerators, shall be installed in the ash separator

junction of the sander dust boiler stack. This location may not be a direct indicator of stack opacity, but shall be used to alert the boiler operator to possible upset conditions. The monitor shall have a remote readout visible or audible to the operator of the boiler. Roseburg shall immediately initiate corrective action whenever emissions to atmosphere in excess of 20% opacity are observed from the sander dust boiler stack. Data from the monitor need not be recorded and digitized unless the Department has reason to believe a violation of the opacity standard exists and requests that Roseburg record and maintain the data (ARM 17.8.749).

- W.5. The Department reserves the right to require opacity monitors at the sander dust boiler stack. The decision to require this monitoring shall be based upon whether or not the Department has reason to believe a violation of the opacity standard exists. If excess emissions exist or may exist at these locations, further opacity monitoring may be required (ARM 17.8.749).

Compliance Demonstration

- W.6. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on Boiler #1 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- W.7. Roseburg shall perform Method 5 Source Test(s) as required by the Department to monitor compliance with Section III.W.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- W.8. Roseburg shall perform Method 201A Source Test(s) as required by the Department to monitor compliance with Section III.W.3. Method 5 results may be used as a surrogate for PM₁₀ if the impinger analysis ("back-half") is included. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- W.9. Roseburg shall annually certify that an electric eye monitor, similar to those used in incinerators, is installed in the ash separator junction of the sander dust boiler stack as required by Section III.W.4. Roseburg shall further certify that the monitor has a remote readout visible or audible to the operator

of the boiler and that corrective action was immediately taken whenever emissions to atmosphere exceeding 20% opacity are observed from the sander dust boiler stack (ARM 17.8.1213).

W.10. Roseburg shall annually certify that opacity monitors at the sander dust boiler abort stack are installed and operating, if required by the Department (ARM 17.8.1213).

Recordkeeping

W.11. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.W.6. Each log entry must include the date, time, results of the survey, and observer’s initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer’s initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).

W.12. The Method 5 and Method 201A Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.W.2 and III.W.3, as required (ARM 17.8.1212).

W.13. Recordkeeping is not necessary to verify compliance with Sections III.W.4 and III.W.5 (ARM 17.8.1212).

Reporting

W.14. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):

- a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.W.6;
- b. A summary of any corrective actions taken as a result of the weekly visual surveys;
- c. A summary of the results of any Method 5 Source Tests that are required by the Department;
- d. A summary of the results of any Method 201A Source Tests that are required by the Department;
- e. A certification that the electric eye monitor is installed in the ash separator junction of the sander dust boiler stack; and
- f. A certification that the opacity monitor is installed and operating on the sander dust boiler abort stack (if required by the Department).

**X. ROEMMC BURNER
EU33 – Roemmc Burner (ROEMMC)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
X.1, X.8, X.14, X.20	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
X.2, X.9, X.15, X.20	Particulate From Fuel Combustion	$E = 1.026^* H^{-0.233}$	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
X.3, X.10, X.16, X.20	Sander Dust Combustion	23000 Tons per Rolling 12-Month Period	Log	Monthly	Log	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
X.4, X.11, X.17, X.20	NO _x	115.0 lb/hr	Method 7E	Initially and Semi-annually Thereafter	Method 7E Source Test Reports as Necessary	Semi-annual
X.5, X.11, X.17, X.20	CO	100.0 lb/hr	Method 10	Initially and Semi-annually Thereafter	Method 10 Source Test Reports as Necessary	Semi-annual
X.6, X.12, X.18, X.20	VOC	0.35 lb/hr	Method 18, Method 25, or Method 25A as Determined by the Department	As required by the Department	Method 18, Method 25, or Method 25A Source Test Reports as Necessary	Semi-annual
X.7, X.13, X.19, X.20	Opacity Monitor	Install and Operate (potentially required)	Certify (if required to install by the Department)	Semi-annual	None	Semi-annual

Conditions

- X.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- X.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of $E = 1.026 * H^{-0.233}$ for new fuel-burning equipment, where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lbs/MMBtu (ARM 17.8.309).
- X.3. Roseburg shall not combust more than 23000 tons of sander dust in the Roemmc Burner during any rolling 12-month time period (ARM 17.8.749).
- X.4. Emissions of NO_x from the Roemmc Burner shall not exceed 115.0 lb/hr (ARM 17.8.749).
- X.5. Emissions of CO from the Roemmc Burner shall not exceed 100.0 lb/hr (ARM 17.8.749).
- X.6. Emissions of VOCs from the Roemmc Burner shall not exceed 0.35 lb/hr (ARM 17.8.749).
- X.7. The Department reserves the right to require opacity monitors at the Roemmc sander dust burner abort stack. The decision to require this monitoring shall be based upon whether or not the Department has reason to believe a violation of the opacity standard exists. If excess emissions exist or may exist at these locations, further opacity monitoring may be required (ARM 17.8.149).

Compliance Demonstration

- X.8. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on the Roemmc Burner and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- X.9. Roseburg shall perform Method 5 Source Test(s) as required by the Department to monitor compliance with Section III.X.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- X.10. Compliance with the sander dust combustion limit in Section III.X.3 may be demonstrated by logging and summing the sander dust combusted in the Roemmc Burner and keeping the combustion of sander dust below 23,000 tons per rolling 12-month period (ARM 17.8.1213).
- X.11. Roseburg shall perform Method 7E and Method 10 Source Tests on the Roemmc Burner emissions for NO_x and CO, concurrently, within 90 days of issuance of Permit #2303-09 to monitor compliance with the NO_x and CO emission limits in Section III.X.4 and III.X.5. The testing shall continue semi-annually, or according to another testing/monitoring schedule as may be approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.105 and ARM 17.8.749).
- X.12. Roseburg shall perform Method 18, Method 25, or Method 25A (as determined by the Department) Source Tests as required by the Department to monitor compliance with Section III.X.6. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.1213).
- X.13. Roseburg shall annually certify that opacity monitors at the Roemmc Burner abort stack are installed and operating, if required by the Department (ARM 17.8.1213).

Recordkeeping

- X.14. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.X.8. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- X.15. The Method 5 Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.X.2, as required (ARM 17.8.1212).
- X.16. Roseburg shall document, by month, the tons of sander dust combusted in the Roemmc Burner. By the 25th of each month, Roseburg shall total the sander dust combusted in the Roemmc Burner during the previous 12 months to verify compliance with the limitation in Section III.X.3. A written report

of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).

X.17. The Method 7E and Method 10 Source Test Report(s) shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.X.4 and III.X.5, as required (ARM 17.8.1212).

X.18. The Method 18, 25, or 25A Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.X.6, as required (ARM 17.8.106).

X.19. Recordkeeping is not necessary to verify compliance with Section III.X.7 (ARM 17.8.1212).

Reporting

X.20. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):

- a. A summary of the results of any Method 9 Source Tests that are conducted during the reporting period as required by Section III.X.8;
- b. A summary of any corrective actions taken as a result of the weekly visual surveys;
- c. A summary of the results of any Method 5 Source Tests that are required by the Department
- d. A summary of the results of any Method 7E and Method 10 Source Tests that are required by the Department;
- e. A summary of the results of any Method 18, 25, or 25A Source Tests that are required by the Department; and
- f. A certification that the opacity monitor is installed and operating on the Roemmc Burner abort stack (if required by the Department).

**Y. COEN BURNER
EU34 – Coen Burner (COEN)**

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
Y.1, Y.9, Y.16, Y.23	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
Y.2, Y.10, Y.17, Y.23	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
Y.3, Y.11, Y.18, Y.23	Sander Dust Combustion	5000 Tons During any Rolling 12-Month Period	Log	Monthly	Log	Semi-annual
Y.4, Y.12, Y.19, Y.23	Natural Gas Combustion	292 MMscf During any Rolling 12-Month Period	Log	Monthly	Log	Semi-annual

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
Y.5, Y.13, Y.20, Y.23	NO _x	73.1 lb/hr	Method 7E	Every 2-Years	Method 7E Source Test Reports as Necessary	Semi-annual
Y.6, Y.13, Y.20, Y.23	CO	28.4 lb/hr	Method 10	Every 2-Years	Method 10 Source Test Reports as Necessary	Semi-annual
Y.7, Y.14, Y.21, Y.23	VOC	0.25 lb/hr	Method 18, Method 25, or Method 25A as Determined by the Department	As Required by the Department	Method 18, Method 25, or Method 25A Source Test Reports as Necessary	Semi-annual
Y.8, Y.15, Y.22, Y.23	Opacity Monitor	Potentially Required	Install and Operate	As Required by the Department	None	None

Conditions

- Y.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- Y.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of $E = 1.026 * H^{-0.233}$ for new fuel-burning equipment, where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lb/MMBtu (ARM 17.8.309).
- Y.3. Roseburg shall not combust more than 5000 tons of sander dust in the Coen Burner during any rolling 12-month time period (ARM 17.8.749).
- Y.4. Roseburg shall not combust more than 292 million standard cubic feet (MMscf) of natural gas in the Coen Burner during any rolling 12-month time period (ARM 17.8.749).
- Y.5. Emissions of NO_x from the Coen Burner shall not exceed 73.1 lb/hr (ARM 17.8.749).
- Y.6. Emissions of CO from the Coen Burner shall not exceed 28.4 lb/hr (ARM 17.8.749).
- Y.7. Emissions of VOCs from the Coen Burner shall not exceed 0.25 lb/hr (ARM 17.8.749).
- Y.8. The Department reserves the right to require opacity monitors at the Coen Burner abort stack. The decision to require this monitoring shall be based upon whether or not the Department has reason to believe a violation of the opacity standard exists. If excess emissions exist or may exist at these locations, further opacity monitoring may be required.

Compliance Demonstration

- Y.9. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then

the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on the Coen Burner and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- Y.10. Roseburg shall perform Method 5 Source Tests as required by the Department to monitor compliance with Section III.Y.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.106).
- Y.11. Compliance with the sander dust combustion limit in Section III.Y.3 may be monitored by logging and summing the sander dust combusted in the Coen Burner and keeping the combustion of sander dust below 5,000 tons per rolling 12-month period (ARM 17.8.1213).
- Y.12. Compliance with the natural gas combustion limit in Section III.Y.4 may be monitored by logging and summing the natural gas combusted in the Coen Burner and keeping the combustion of natural gas below 292 MMscf per rolling 12-month period (ARM 17.8.1213).
- Y.13. Roseburg shall perform Method 7E and Method 10 source tests on the Coen Burner emissions for NO_x and CO, concurrently, within 90 days of issuance of Permit #2303-09 to monitor compliance with the NO_x and CO emission limits in Section III.Y.5 and III.Y.6. The testing shall continue on an every 2-year basis, or according to another testing/monitoring schedule as may be approved by the Department. The source testing shall occur while Roseburg is using sander dust as the fuel for the Coen Burner, unless otherwise approved by the Department. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.105 and ARM 17.8.749).
- Y.14. Roseburg shall perform Method 18, Method 25, or Method 25A (as determined by the Department) Source Tests as required by the Department to monitor compliance with Section III.Y.7. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.106).
- Y.15. Roseburg shall annually certify that opacity monitors at the Coen Burner abort stack are installed and operating, if required by the Department (ARM 17.8.1213).

Recordkeeping

- Y.16. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.Y.9. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (Arm 17.8.1212).

- Y.17. The Method 5 Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.Y.2, as required (ARM 17.8.1212).
- Y.18. Roseburg shall document, by month, the tons of sander dust combusted in the Coen Burner. By the 25th of each month, Roseburg shall total the sander dust combusted in the Coen Burner during the previous 12 months to verify compliance with the limitation in Section III.Y.3. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- Y.19. Roseburg shall document, by month, the volume of natural gas combusted in the Coen Burner. By the 25th of each month, Roseburg shall total the volume of natural gas combusted in the Coen Burner during the previous 12 months to verify compliance with the limitation in Section III.Y.4. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- Y.20. The Method 7E and Method 10 Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Sections III.Y.5 and III.Y.6, as required (ARM 17.8.106).
- Y.21. The Method 18, Method 25, or Method 25A Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.Y.7, as required (ARM 17.8.106).
- Y.22. Recordkeeping is not necessary to verify compliance with Section III.Y.8 (ARM 17.8.1212).

Reporting

- Y.23. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.Y.9;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;
 - d. A copy of the log demonstrating the consumption of sander dust in the Coen Burner;
 - e. A copy of the log demonstrating the consumption of natural gas in the Coen Burner;
 - f. A summary of the results of any Method 7E and Method 10 Source Tests that are required by the Department;
 - g. A summary of the results of any Method 18, Method 25, or Method 25A Source Tests that are required by the Department; and
 - h. A certification that the opacity monitor is installed and operating on the Coen Burner abort stack (if required by the Department).

Z. HOT OIL HEATER
EU35 – Line 2 Hot Oil Heater (GEKA200)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
Z.1, Z.5, Z.9, Z.13	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
Z.2, Z.6, Z.10, Z.13	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department	Method 5 Source Test Reports as Necessary	Semi-annual
Z.3, Z.7, Z.11, Z.13	Natural Gas Combustion	166.9 MMscf During any Rolling 12-Month Period	Log	Monthly	Log	Semi-annual
Z.4, Z.8, Z.12, Z.13	Opacity Monitor	Potentially Required	Install and Operate	As Required by the Department	None	None

Conditions

- Z.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- Z.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of $E = 1.026 * H^{-0.233}$ for new fuel-burning equipment, where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lbs/MMBtu (ARM 17.8.309).
- Z.3. Roseburg shall not combust more than 166.9 MMscf of natural gas in the GEKA200 Burner during any rolling 12-month time period (ARM 17.8.749).
- Z.4. The Department reserves the right to require opacity monitors at the hot oil heater stack. The decision to require this monitoring shall be based upon whether or not the Department has reason to believe a violation of the opacity standard exists. If excess emissions exist or may exist at these locations, further opacity monitoring may be required (ARM 17.8.1201[10]).

Compliance Demonstration

- Z.5. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on the GEKA200 Burner and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- Z.6. Roseburg shall perform Method 5 Source Tests as required by the Department to monitor compliance with Section III.Z.2. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual, and the Department may require additional testing (ARM 17.8.106 and ARM 17.8.1213).
- Z.7. Compliance with the natural gas combustion limit in Section III.Z.3 may be monitored by logging and summing the natural gas combusted in the GEKA200 Burner and keeping the combustion of natural gas below 166.9 MMscf per rolling 12-month period (ARM 17.8.1213).
- Z.8. Roseburg shall annually certify that opacity monitors at the GEKA200 Burner abort stack are installed and operating, if required by the Department (ARM 17.8.1213).

Recordkeeping

- Z.9. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.Z.5. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- Z.10. The Method 5 Source Test Reports shall be completed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with Section III.Z.2, as required (ARM 17.8.106).
- Z.11. Roseburg shall document, by month, the volume of natural gas combusted in the GEKA200 Burner. By the 25th of each month, Roseburg shall total the volume of natural gas combusted in the GEKA200 Burner during the previous 12 months to verify compliance with the limitation in Section III.Z.3. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- Z.12. Recordkeeping is not necessary to verify compliance with Section III.Z.4 (ARM 17.8.1212).

Reporting

- Z.13. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.Z.5;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A summary of the results of any Method 5 Source Tests that are required by the Department;

- d. A copy of the log monitoring the consumption of natural gas in the GEKA200; and
- e. A certification that the opacity monitor is installed and operating on the Coen Burner abort stack (if required by the Department).

AA. FUGITIVES
EU36 - Outside Truck Dump (FUG50)
EU37 - Pile Reclaim (FUG51)
EU38 - Radial Stacker (FUG52)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
AA.1, AA.2, AA.3, AA.4	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual

Conditions

- AA.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).

Compliance Demonstration

- AA.2. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on FUG50, FUG51, and FUG52 and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

Recordkeeping

AA.3. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.AA.2. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.106).

Reporting

AA.4. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):

- a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.AA.2; and
- b. A summary of any corrective actions taken as a result of the weekly visual surveys.

BB. REMANUFACTURING FACILITY EU39 – Remanufacturing Facility (REMAN)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
BB.1, BB.4, BB.7, BB.10	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
BB.2, BB.5, BB.8, BB.10	Production of Painted Material from Bullnose #2	14.7 Million Linear Feet per Rolling 12-Month Period	Log	Monthly	Log	Semi-annual
BB.3, BB.6, BB.9, BB.10	Paints (VOCs)	Water-Based Paints and U.V. Curable Fillers	Certify	Semi-annual	None	Semi-annual

Conditions

- BB.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- BB.2. The production of painted material from Bullnose #2 shall not exceed 14.7 million linear feet per rolling 12-month period (ARM 17.8.749).
- BB.3. Paints used on Roseburg's paintline shall be water-based and fillers shall be U.V. curable (ARM 17.8.749).

Compliance Demonstration

BB.4. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each

observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on REMAN and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- BB.5. Compliance with the limit on the amount of production from Bullnose #2 may be monitored by logging and summing the productions from Bullnose #2 and keeping the production below 14.7 million linear feet per rolling 12-month period (ARM 17.8.1213).
- BB.6. Roseburg shall semi-annually certify that paints used on the paintline are water-based and fillers are U.V. curable (ARM 17.8.1213).

Recordkeeping

- BB.7. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.BB.4. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).
- BB.8. Roseburg shall document, by month, the production of painted material from Bullnose #2. By the 25th of each month, Roseburg shall total the production of painted material from Bullnose #2 during the previous 12 months to verify compliance with the limitation in Section III.BB.2. A written report of the compliance verification shall be submitted along with the annual emissions inventory (ARM 17.8.749).
- BB.9. Recordkeeping is not necessary to verify compliance with Section III.BB.3 (ARM 17.8.1212).

Reporting

- BB.10. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
 - a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.BB.4;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys;
 - c. A copy of the log demonstrating the amount of production of painted material from Bullnose #2; and
 - d. A certification that only water based paints and T.U. curable fillers have been used in the REMAN process.

CC. NATURAL GAS BURNERS

EU40 – #1 Dryer Line 1 Natural Gas Burner (DRY-NG 100)

EU41 – #2 Dryer Line 1 Natural Gas Burner (DRY-NG 101)

EU42 – #3 Dryer Line 1 Natural Gas Burner (DRY-NG 102)

EU43 – #4 Dryer Line 1 Natural Gas Burner (DRY-NG 103)

EU44 – #1 Dryer Line 2 Natural Gas Burner (DRY-NG 200)

EU45 – #2 Dryer Line 2 Natural Gas Burner (DRY-NG 201)

Permit Condition	Pollutant/Parameter	Permit Limitation	Compliance Demonstration		Record-Keeping	Reporting
			Method	Frequency		
CC.1, CC.4, CC.6, CC.8	Opacity	20%	Method 9	As Required by the Department	Method 9 Source Test Reports as Necessary	Semi-annual
			Visual Surveys	Weekly	Log	Semi-annual
CC.2, CC.5, CC.7, CC.8	particulate from fuel combustion	$E=1.026 * H^{-0.233}$	burning pipeline quality natural gas	Continuous	None	Semi-annual
CC.3, CC.5, CC.7, CC.8	sulfur compounds in fuel (gaseous)	<u>50 grains</u> 100 SCF	burning pipeline quality natural gas	Continuous	None	Semi-annual

Conditions

- CC.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304[1]).
- CC.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of $E = 1.026 * H^{-0.233}$ for new fuel burning equipment, where: H = heat input capacity in MMBtu/hr and E = maximum allowable emission rate in lbs/MMBtu (ARM 17.8.309).
- CC.3. Roseburg shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions (ARM 17.8.322[5]).

Compliance Demonstration

- CC.4. **Method 9** - Pursuant to ARM 17.8.101(27), opacity is determined under 40 CFR Part 60, Appendix A, Method 9, or by an in-stack transmissometer complying with 40 CFR, Appendix B, Performance Specification 1.

Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106), except that prior notification of the test is not required. Each observation period must be a minimum of 6 minutes, unless any one reading is 20% or greater; then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

For purposes of compliance certification, Roseburg shall conduct weekly visual surveys of visible emissions on the natural gas burners and Method 9 VEOs as required by the Department. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined in compliance with Method 9.

Visual Surveys - Weekly (during daylight hours), Roseburg shall visually survey each of the above listed emitting units for any excessive emissions. For the purpose of this survey, excessive emissions are any visible emissions that leave an emitting unit. The person conducting the survey does not have to be an EPA Method 9 qualified observer. However, the individual must be familiar with the procedures of EPA Method 9, including the proper location from which to observe visible emissions. Whether a Method 9 test or visual survey is conducted, if a source of excessive emissions is identified, Roseburg shall contain or minimize the source of emissions (e.g., cover the material, or use water or chemical treatment to minimize the emissions), unless cold weather would make this activity result in hazardous conditions. If water is used to control fugitive dust emissions, Roseburg shall take precautions to avoid creating a water quality problem from surface water runoff (ARM 17.8.101, ARM 17.8.106, and ARM 17.8.1213).

- CC.5. Compliance with the particulate from fuel combustion and sulfur compounds in fuel requirements (gaseous) may be satisfied by burning pipeline quality natural gas on a continuous basis.

Recordkeeping

- CC.6. Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.CC.2. Each log entry must include the date, time, results of the survey, and observer's initials. If Method 9 tests are conducted, reports must be maintained on site and submitted in accordance with the Montana Source Test Protocol and Procedures Manual. Whether visual surveys or Method 9 tests are conducted, if any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.106).
- CC.7. Recordkeeping is not required to verify compliance with ARM 17.8.309 and ARM 17.8.322 (ARM 17.8.1212).

Reporting

- CC.8. The reports required by Conditions A.12 and A.13 must address the following (ARM 17.8.1212):
- a. A summary of the results of any Method 9 Source Tests conducted during the reporting period as required by Section III.CC.4;
 - b. A summary of any corrective actions taken as a result of the weekly visual surveys; and
 - c. A verification that only pipeline quality natural gas was used in the burners.

Section IV - NONAPPLICABLE REQUIREMENTS

Roseburg requested a shield from numerous Air Quality Administrative Rules of Montana (ARM) and Federal Regulations. Many of the rules that Roseburg requested shields from are included in the following table. Federal regulations identified as not applicable to the facility at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude Roseburg from complying with any new requirement that may become applicable during the permit term.

A. FACILITY WIDE

Rule Citation		Reason
State	Federal	
ARM 17.8.321 ARM 17.8.323 ARM 17.8.331 ARM 17.8.332 ARM 17.8.333 ARM 17.8.334		These rules are not applicable because the facility is not listed in the source category cited in the rules.
ARM 17.8.316		These rules are not applicable because the facility does not have the specific emission unit cited in the rules or is excluded by rule.
	40 CFR 57 40 CFR 60 40 CFR 61 40 CFR 62 40 CFR 63 40 CFR 72 40 CFR 73 40 CFR 75 40 CFR 76 40 CFR 77 40 CFR 82	These requirements are not applicable because the facility is not an affected source as defined in these regulations.

B. EMISSION UNIT

Roseburg did not request a shield for specific emission units; therefore, a permit shield will not be granted to individual emission units.

Section V - GENERAL PERMIT CONDITIONS

A. COMPLIANCE REQUIREMENTS

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(a)-(c)&(e), §1206(6)(c)&(b)

1. The permittee must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.
2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for

noncompliance with an applicable requirement if the source demonstrates that both the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety or environmental impacts were unforeseeable and could not have otherwise been avoided.

4. The permittee shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of the permittee to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.
5. Any schedule of compliance for applicable requirements with which the source is not in compliance with at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it was based.
6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

B. CERTIFICATION REQUIREMENTS

ARM 17.8, Subchapter 12, Operating Permit Program §1207 and §1213(7)(a)&(c)-(e)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12, shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
2. Compliance certifications shall be submitted by January 31 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 – December 31).
3. Compliance certifications shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;
 - b. The compliance status as shown by monitoring or other information required by the permit or otherwise reasonably available to the source;
 - c. Whether compliance was continuous or intermittent;
 - d. The method(s) used for determining the compliance status of the source, currently and over the reporting period, consistent with ARM 17.8.1212; and
 - e. Such other facts as the Department may require to determine the compliance status of the source.
4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

C. PERMIT SHIELD

ARM 17.8, Subchapter 12, Operating Permit Program §1214(1)-(4)

1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a precise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.
2. The permit shield described in 1 above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, or revocation and reissuance) to the Board of Environmental Review (Board), until such time as the Board renders its final decision.
3. Nothing in this permit alters or affects the following:
 - a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under that section.
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
 - c. The applicable requirements of the Acid Rain Program, consistent with Sec. 7651g(a) of the FCAA.
 - d. The ability of the administrator to obtain information from a source pursuant to Sec. 7414 of the FCAA.
 - e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, Chapter 2, MCA.
 - f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, Chapter 2, MCA.
 - g. The ability of the Department to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12, is appealed to the Board, the permit shield, as it applies to the source's existing permit, shall remain in effect until such time as the Board has rendered its final decision.
4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation of an applicable requirement or permit term demonstrated pursuant to ARM 17.8.106, Source Testing Protocol.
5. Pursuant to ARM 17.8.132, for the purpose of submitting a compliance certification, nothing in these rules shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance. However, when compliance or noncompliance is demonstrated by a test or procedure provided by permit or other applicable requirements, the source shall then be presumed to be in compliance or noncompliance unless that presumption is overcome by other relevant credible evidence.
6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see Sections I & J).
7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see Sections K & N).

D. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

ARM 17.8, Subchapter 12, operating Permit Program §1212(2)&(3)

1. Unless otherwise provided in this permit, the permittee shall maintain compliance monitoring records that include the following information.
 - a. The date, place as defined in the permit, and time of sampling or measurement;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions at the time of sampling or measurement.
2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be maintained in their original form at the plant site and shall be made available to Department personnel upon request.
3. The permittee shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by January 31 and July 31 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted on January 31 of each year must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted on July 31 of each year must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207.

E. PROMPT DEVIATION REPORTING

ARM 17.8, Subchapter 12, Operating Permit Program §1212(3)(c)

The permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be reported as part of the routine reporting requirements under ARM 17.8.1212(3)(b) and, if applicable, in accordance with the malfunction reporting requirements under ARM 17.8.110, unless otherwise specified in an applicable requirement.

F. EMERGENCY PROVISIONS

ARM 17.8, Subchapter 12, Operating Permit Program §1201(13) and §1214(5), (6)&(8)

1. An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation and causes the source to exceed a technology-based emission limitation under this permit due to the unavoidable increases in emissions attributable to

the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates through properly signed, contemporaneous logs, or other relevant evidence, that:
 - a. An emergency occurred and the permittee can identify the cause(s) of the emergency.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit.
 - d. The permittee submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

G. INSPECTION AND ENTRY

ARM 17.8, Subchapter 12, Operating Permit Program §1213(3)&(4)

1. Upon presentation of credentials and other requirements as may be required by law, the permittee shall allow the Department, the administrator, or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:
 - a. Enter the premises where a source required to obtain a permit is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
 - c. Inspect at reasonable times any facilities, emission units, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor, at reasonable times, any substances or parameters at any location for the purpose of assuring compliance with the permit or applicable requirements.
2. The permittee shall inform the inspector of all workplace safety rules or requirements at the time of inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

H. FEE PAYMENT

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(f) and ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation, and Open Burning Fees §505(3)-(5) (STATE ONLY)

1. The permittee must pay application and operating fees, pursuant to ARM Title 17, Chapter 8,

Subchapter 5.

2. Annually, the Department shall provide the permittee with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after the completion of an appeal, is due immediately upon issuance of the Board's decision or upon completion of any judicial review of the Board's decision.
3. If the permittee fails to pay the required fee (or any required portion of an appealed fee) within 90 days of the due date of the fee, the Department may impose an additional assessment of 15% of the fee (or any required portion of an appealed fee) or \$100, whichever is greater, plus interest on the fee (or any required portion of an appealed fee), computed at the interest rate established under 15-31-510(3), MCA.

I. MINOR PERMIT MODIFICATIONS

ARM 17.8, Subchapter 12, Operating Permit Program §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.
2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

J. CHANGES NOT REQUIRING PERMIT REVISION

ARM 17.8, Subchapter 12, Operating Permit Program §1224(1)-(3), (5)&(6)

1. The permittee is authorized to make changes within the facility as described below, provided the following conditions are met.
 - a. The proposed changes do not require the permittee to obtain an air quality preconstruction permit under ARM Title 17, Chapter 8, Subchapter 7.
 - b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9, or 10.
 - c. The emissions resulting from the proposed changes do not exceed the emissions allowable under this permit, whether expressed as a rate of emissions or in total emissions.
 - d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emission units covered by the permit.
 - e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes.
2. The permittee and the Department shall attach each notice provided pursuant to 1.e above to their respective copies of this permit.
3. Pursuant to the conditions above, the permittee is authorized to make Section 502(b)(10) changes, as defined in ARM 17.8.1201(30), without a permit revision. For each such change, the written notification required under 1.e above shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
4. The permittee may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided the following conditions are met.

- a. Each proposed change does not weaken the enforceability of any existing permit conditions.
 - b. The Department has not objected to such change.
 - c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition.
 - d. The permittee provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and (5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

K. SIGNIFICANT PERMIT MODIFICATIONS

ARM 17.8, Subchapter 12, Operating Permit Program §1227(1), (3)&(4)

1. The modification procedures set forth in 2 below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:
 - a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment;
 - b. Every significant change in existing permit monitoring terms or conditions;
 - c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to determine compliance with any applicable rule, consistent with the requirements of the rule; or
 - d. Any other change determined by the Department to be significant.
2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation or deletion.
3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

L. REOPENING FOR CAUSE

ARM 17.8, Subchapter 12, Operating Permit Program §1228(1)&(2)

This permit may be reopened and revised under the following circumstances.

1. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of 3 or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms or conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2).
2. Additional requirements (including excess emission requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emission offset plans shall be deemed incorporated into the permit.

3. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
4. The administrator or the Department determines that the permit must be revised or revoked and reissued to ensure compliance with the applicable requirements.

M. PERMIT EXPIRATION AND RENEWAL

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(g), §1220(11)&(12), and §1205(2)(d)

1. This permit is issued for a fixed term of 5-years.
2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for application, content, public participation, and affected state and administrator review.
3. Expiration of this permit terminates the permittee's right to operate unless a timely and administratively complete renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted, all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.
4. For renewal, the permittee shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify, in writing to the permittee, a longer time period for submission of the renewal application. Such written notification must be provided at least 1-year before the renewal application due date established in the existing permit.

N. SEVERABILITY CLAUSE

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(i)&(l)

1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply as if a final permit decision had not been reached by the Department.
2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in one or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

O. TRANSFER OR ASSIGNMENT OF OWNERSHIP

ARM 17.8, Subchapter 12, Operating Permit Program §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage and liability between the current and new permittee.
2. The permit shield provided for in ARM17.8.1214 shall not extend to administrative permit amendments.

P. EMISSIONS TRADING, MARKETABLE PERMITS, ECONOMIC INCENTIVES

ARM 17.8, Subchapter 12, Operating Permit Program §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits,

emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana State Implementation Plan or in applicable requirements promulgated by the administrator.

Q. NO PROPERTY RIGHTS CONVEYED

ARM 17.8, Subchapter 12, Operating Permit Program §1210(2)(d)

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

R. TESTING REQUIREMENTS

ARM 17.8, Subchapter 1, General Provisions §105

The permittee shall comply with ARM 17.8.105.

S. SOURCE TESTING PROTOCOL

ARM 17.8, Subchapter 1, General Provisions §106

The permittee shall comply with ARM 17.8.106.

T. MALFUNCTIONS

ARM 17.8, Subchapter 1, General Provisions §110

The permittee shall comply with ARM 17.8.110.

U. CIRCUMVENTION

ARM 17.8, Subchapter 1, General Provisions §111

The permittee shall comply with ARM 17.8.111.

V. MOTOR VEHICLES

ARM 17.8, Subchapter 3, Emission Standards §325

The permittee shall comply with ARM 17.8.325.

W. ANNUAL EMISSIONS INVENTORY

ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees §505 (STATE ONLY)

The permittee shall supply the Department with annual production and other information for all emission units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

X. OPEN BURNING

ARM 17.8, Subchapter 6, Open Burning §604, 605 and 606

The permittee shall comply with ARM 17.8.604, 605 and 606.

Y. PRECONSTRUCTION PERMITS

ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources §745, and 764 (ARM 17.8.745 and 764 are STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP)

1. Except as specified, no person shall construct, install, alter or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.745.

2. The permittee shall comply with ARM 17.8.745, 748 and 764.
3. ARM 17.8.745 specifies de minimis changes as construction or changed conditions of operation at a facility holding an air quality preconstruction permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 15 tons per year of any pollutant, except (STATE ENFORCEABLE ONLY until approved by the EPA as part of the SIP):
 - a. Any construction or changed condition that would violate any condition in the facility's existing air quality preconstruction permit or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745.
 - b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9 or 10 of Chapter 8.
 - c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804.
 - d. Any construction or improvement project with a potential to emit more than 15 tons per year may not be artificially split into smaller projects to avoid air quality preconstruction permitting.
 - e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.
4. Any facility making a de minimis change pursuant to ARM 17.8.745 shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745. (STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP)

Z. NATIONAL EMISSION STANDARD FOR ASBESTOS
40 CFR, Part 61, Subpart M

The permittee shall not conduct any asbestos abatement activities except in accordance with 40 CFR 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

AA. ASBESTOS
ARM 17.74, Subchapter 3, General Provisions and Subchapter 4 Fees

The permittee shall comply with ARM 17.74.301, *et seq.*, and ARM 17.74.401, *et seq.* (State only)

BB. STRATOSPHERIC OZONE PROTECTION – SERVICING OF MOTOR VEHICLE AIR CONDITIONERS
40 CFR, Part 82, Subpart B

If the permittee performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR 82, Subpart B.

CC. STRATOSPHERIC OZONE PROTECTION – RECYCLING AND EMISSION REDUCTIONS
40 CFR, Part 82, Subpart F

The permittee shall comply with the standards for recycling and emission reductions in 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B.

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
2. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.
4. Persons disposing of small appliances, MVACs and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166.
5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

DD. EMERGENCY EPISODE PLAN

The permittee shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region, shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department, following Priority I reclassification.

EE. DEFINITIONS

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit, shall have the meaning assigned to them in the referenced regulations.

APPENDICES

APPENDIX A - INSIGNIFICANT EMISSION UNITS

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Roseburg, the permitting authority, inspectors, and the public.

Pursuant to ARM 17.8.1201(22)(a), an insignificant emission unit means any activity or emission unit located within a source that: (i) has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to section 7412 (b) of the FCAA; and (iv) is not regulated by an applicable requirement, other than a generally applicable requirement that applies to all emission units subject to Subchapter 12.

List of Insignificant Activities

The following table of insignificant sources and/or activities was provided by Roseburg to assist in the understanding of the facility layout. Currently, there are no requirements to update such a list, so sources and/or activities may have changed since the last filing.

Insignificant Emission Unit ID	Description
IEU1	Auxiliary Diesel Generators (I2)
IEU2	Degreasing (I7)
IEU3	Portable Heaters (I9)
IEU4	Wax Pump (I15)
IEU5	Gas Powered Sump Pump (I2)
IEU6	Fire Pond Dredging (I120)
IEU7	Diesel Tank (I23)
IEU8	Gasoline Storage Tank (I22)
IEU9	2 Wax Tanks (I22)
IEU10	10 Resin Tanks (I22)
IEU11	1 Day Use Wax Tank (I22)
IEU12	Propane Storage Tanks (I25, I31)
IEU13	General Repair and Maintenance (I34)
IEU14	Machining – General Maintenance (I36)
IEU15	2-52 Gallon Brine Tanks (I33)
IEU16	Septic System with Lift System (I40)
IEU17	Space Heaters (I43)
IEU18	Steam Cleaning – General Maintenance (I45)
IEU19	Knife Sharpening Solution (I46)

IEU20	Storage of Various Solid Materials (I47)
IEU21	Storage of Ammonium Sulfate (I47)
IEU22	Water Softener Salt (I47)
IEU23	Ultra Violet Curing of Particleboard (I50)
IEU24	Various Vacuum System – Shop Vac (I52)
IEU25	Various Vents (I53)
IEU26	Welding – General Maintenance (I57)

APPENDIX B - DEFINITIONS AND ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 T.R. 7401, *et seq.*

"Administrative permit amendment" means an air quality operating permit revision that:

- (a) Corrects typographical errors;
- (b) Identifies a change in the name, address or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source;
- (c) Requires more frequent monitoring or reporting by Roseburg;
- (d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements;
- (e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225; or
- (f) Incorporates any other type of change that the Department has determined to be similar to those revisions set forth in (a)-(e), above.

"Applicable requirement" means all of the following as they apply to emissions units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rule making at the time of issuance of the air quality operating permit, but have future-effective compliance dates; provided that such requirements apply to sources covered under the operating permit):

- (a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;
- (b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under subchapters 7, 8, 9 and 10 of this chapter, or pursuant to regulations approved or promulgated through rule making under Title I of the FCAA, including parts C and D;
- (c) Any standard or other requirement under section 7411 of the FCAA, including section 7411(d);
- (d) Any standard or other requirement under section 7412 of the FCAA, including any requirement concerning accident prevention under section 7412(r)(7), but excluding the contents of any risk management plan required under section 7412(r);
- (e) Any standard or other requirement of the acid rain program under Title IV of the FCAA or regulations promulgated thereunder;
- (f) Any requirements established pursuant to section 7661c(b) or section 7414(a)(3) of the FCAA;
- (g) Any standard or other requirement governing solid waste incineration, under section 7429 of the FCAA;
- (h) Any standard or other requirement for consumer and commercial products, under section 7511b(e) of the FCAA;

- (i) Any standard or other requirement for tank vessels, under section 7511b(f) of the FCAA;
- (j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit;
- (k) Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to section 7661c(e) of the FCAA; or
- (l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under subchapter 6.

"Department" means the Montana Department of Environmental Quality.

"Emission unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under section 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

"Excess Emissions" means any visible emissions from a stack or source, viewed during the visual surveys, believed to exceed the visible emissions during normal operating conditions.

"Excess Fugitive Emissions" means any visible emissions that leave the plant site boundaries.

"FCAA" means the Federal Clean Air Act, as amended.

"Federally enforceable" means all limitations and conditions which are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana state implementation plan, and any permit requirement established pursuant to 40 CFR 52.21, or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana state implementation plan and expressly requires adherence to any permit issued under such program.

"Fugitive emissions" means those emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

"General air quality operating permit" or **"general permit"** means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

"Hazardous air pollutant" means any air pollutant listed as a hazardous air pollutant pursuant to section 112(b) of the FCAA.

"Non-federally enforceable requirement" means the following as they apply to emissions units in a source requiring an air quality operating permit:

- (a) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA;
- (b) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under subchapters 7, 8, 9 and 10 of this chapter that is not federally enforceable;

- (c) Does not include any Montana ambient air quality standard contained in Subchapter 2 of this chapter.

"Permittee" means the owner or operator of any source subject to the permitting requirements of this subchapter, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to this subchapter.

"Regulated air pollutant" means the following:

- (a) Nitrogen oxides or any volatile organic compounds;
- (b) Any pollutant for which a national ambient air quality standard has been promulgated;
- (c) Any pollutant that is subject to any standard promulgated under section 7411 of the FCAA;
- (d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA; or
- (e) Any pollutant subject to a standard or other requirement established or promulgated under section 7412 of the FCAA, including, but not limited to, the following:
 - (i) Any pollutant subject to requirements under section 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established in section 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established in section 7412(e) of the FCAA;
 - (ii) Any pollutant for which the requirements of section 7412(g)(2) of the FCAA have been met, but only with respect to the individual source subject to section 7412(g)(2) requirement.

"Responsible official" means one of the following:

- (a) 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 responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - (ii) The delegation of authority to such representative is approved in advance by the Department.
- (b) For a partnership or sole proprietorship: a general partner or the proprietor; respectively.
- (c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the environmental protection agency).
- (d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under this subchapter.

APPENDIX C - ACRONYMS AND ABBREVIATIONS

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
BTU	British Thermal Unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
dscfm	dry standard cubic feet per minute
EPA	T.R. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
EU	emission unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
IEU	insignificant emission unit
Mbdft	thousand board feet
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
MMbdft	million board feet
MMBTU	million British Thermal Units
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
O ₂	oxygen
Pb	lead
PM	particulate matter
PM10	particulate matter less than 10 microns in size
psi	pounds per square inch
scf	standard cubic feet
SIC	Source Industrial Classification
SO ₂	sulfur dioxide
SO _x	oxides of sulfur
tpy	tons per year
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

APPENDIX D - NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air & Waste Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Montana Department of Environmental Quality
Permitting and Compliance Division
Air & Waste Management Bureau
Missoula Office
301 West Alder
Missoula, MT 59802

United States EPA
Air Program Coordinator
Region VIII, Montana Office
Federal Office Building
10 West 15th Street, Suite 3200
Helena, MT 59626

Permit Modifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air & Waste Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance
Air and Radiation Program
US EPA Region VIII 8P-AR
999 18th Street, Suite 500
Denver, CO 80202-2466

APPENDIX E - AIR QUALITY INSPECTOR INFORMATION

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist the permittee, permitting authority, inspectors, and the public.

- 1. Directions to Plant:** Located approximately 1 mile northwest of the city limits of Missoula, Montana on Raser Drive. The mailing address of the facility is 3300 Raser Drive, Missoula, Montana 59806.
- 2. Safety Equipment Required:** Hard hat, safety glasses, and hearing protection are required at the facility. In addition to the above-mentioned items, and at the direction of a representative of the Roseburg Corporation, additional PPE may be required.
- 3. Facility Plot Plan:** The facility plot plan was submitted as part of the application on June 12, 1996.

APPENDIX F - AMBIENT AIR QUALITY MONITORING

AMBIENT MONITORING PLAN ROSEBURG OP2303-01

1. This ambient air monitoring plan is required by air quality Permit #2303-08, and applies to the particle board production facility of Roseburg in Missoula, Montana. This monitoring plan may be changed from time to time by the Department, but all current requirements of this plan are also considered conditions of the permit.
2. Roseburg shall operate and maintain an air monitoring site in the Missoula valley. The exact location of the monitoring site must be approved by the Department and meet all the requirements contained in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; the EPA Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD), including revisions (EPA-450/4-87-007); Parts 53 and 58 of the Code of Federal Regulations; and any other requirements specified by the Department.
3. Roseburg shall continue air monitoring for a minimum of 2 years with monitoring not to begin before June 1, 2001. Roseburg may request that the Department review the ambient monitoring requirement if changes or commitments are made to reduce the emissions from the facility. Any changes or commitments must be made and approved by the Department on or before June 1, 2001. If changes or commitments are not made and approved by June 1, 2001, then Roseburg shall proceed with the ambient monitoring as required by this attachment. The air monitoring data will be reviewed by the Department to determine if continued monitoring or additional monitoring is warranted.
4. Roseburg shall monitor the following parameters at the site and frequencies described below:

AIRS Number	Site Name	UTM Coordinates (All Zone 11)	Parameter	Frequency
30-063-			NO ₂ ¹ , Wind Speed and Direction, Temperature, Sigma Theta ²	Ongoing
30-063-			O ₃ (ozone)	Ongoing 6/1 to 10/31

¹ NO₂ = nitrogen dioxide ² Sigma Theta = Standard Deviation of Horizontal Wind Direction

5. Data recovery for ozone shall be at least 80% for the third calendar quarter and at least 75% for any month. All other parameters shall be at least 80% computed on a quarterly and annual basis. The Department may require continued monitoring if this condition is not met.
6. Any ambient air monitoring changes proposed by Roseburg must be approved in writing by the Department.
7. Roseburg shall utilize air monitoring and quality assurance procedures which are equal to or exceed the requirements described in the Montana Quality Assurance Manual, including revisions; the EPA Quality Assurance Manual, including revisions; the EPA Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD), including revisions (EPA-450/4-87-007); 40 CFR Parts 53 and 58 of the Code of Federal Regulations; and any other requirements specified by the Department. The ozone monitor shall be audited during the first and final months (June and October) of the monitoring season with an appropriately certified audit device.
8. Roseburg shall submit quarterly data reports within 45 days after the end of the calendar quarter and an annual data report within 90 days after the end of the calendar year. The quarterly data submittal

shall consist of a hard copy "Quarterly Report" and a data disc. The data must be submitted in ASCII files on 3½" floppy disks, in IBM-compatible format. The annual report may be substituted for the fourth quarterly report if all information in #9 below is included in the annual report.

9. The "Quarterly Report" shall have numbered pages, and consist of a narrative data summary and a complete data submittal of all data points in AIRS format. The narrative data summary shall include:
 - a. A topographic map of appropriate scale, with UTM coordinates and a true north arrow, showing the air monitoring site locations in relation to the Roseburg facility and the general Missoula area.
 - b. The quarterly means for NO₂, temperature, wind speed and direction.
 - c. The first, second, and third highest hourly concentrations for ozone and NO₂, the hours and days that they occurred, and the wind speed and direction for those hours.
 - d. The quarterly and monthly wind roses.
 - e. A summary of the data collection efficiency (% recovery = 100 X valid data hours/total hours).
 - f. Explanations for all missing data.
 - g. All precision and accuracy (audit) information. To include zero, span and precision checks. Report input value, response value, and percentage difference. Include copies of all audits. Audit reports should show difference, and percentage difference for each audit point; linear regression analysis of the results including slope, intercept, and correlation coefficient; and NO₂ audits should include the converter efficiency at each audit point.
 - h. A summary of any ambient air standard or PSD increment exceedances.
 - i. All calibration information including the difference and percentage difference at each concentration, and a linear regression analysis of the results showing the slope, intercept and correlation coefficient. NO₂ calibration reports should also include the converter efficiency.
10. The annual data report shall consist of a narrative data summary containing:
 - a. A topographic map of appropriate scale, with UTM coordinates and a true north arrow, showing the air monitoring site locations in relation to the Roseburg facility and the general Missoula area;
 - b. The annual means for NO₂, wind speed and direction;
 - c. The first, second, and third highest hourly concentrations for ozone and NO₂, the hours and days that they occurred, and the wind speed and direction for those hours;
 - d. The five highest, rolling 8-hour concentrations for ozone;
 - e. The annual wind rose;
 - f. An annual summary of data collection efficiency;
 - g. An annual summary of precision and accuracy (audit) data for NO₂, ozone, temperature, wind speed and direction;

- h. An annual summary of any ambient standard or PSD increment exceedance; and
- i. Recommendations for future monitoring.

The Department may audit, or may require Roseburg to contract with an independent firm to audit the air monitoring network, the laboratory performing associated analyses, and any data handling procedures at unspecified times. On the basis of the audits and subsequent reports, the Department may recommend or require changes in the air monitoring network and associated activities in order to improve precision, accuracy and data completeness