MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
TITLE V OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

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Roseburg Forest Products
Missoula Particleboard Facility
P.O. Box 4007
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The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Method 5, Method 9, Method 201A, Method 2
Ambient Monitoring Required	X		NO_2, O_3
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Semi-Annual Reporting Required	X		
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #2303-12
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	
Maximum Achievable Control Technology (MACT)	X		40 CFR 63, Subpart JJ
Major New Source Review (NSR)	X		
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)	X		General SIP

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I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. This document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the operating permit. Conclusions in this document are based on information provided in the original operating permit application submitted by the Louisiana Pacific Corporation (Louisiana-Pacific) and received by the Department of Environmental Quality (Department) on June 12, 1996. An update to the original application was received by the Department on April 21, 2000. In addition, the Department received a name change amendment on February 21, 2003 and a change of Responsible Official request on March 20, 2003. Further, the Department received a request for a significant modification to Operating Permit #OP2303-01 on July 17, 2003, and a request for a change in responsible official on November 10, 2003.

B. Facility Location

The Roseburg Forest Products (Rosegurg) Missoula Particleboard Plant is located in Missoula County, Montana, approximately 1 mile northwest of the city limits of Missoula on Raser Road. The 189-acre site is located in the NW¼ of Section 8, Township 13 North, Range 19 West. The mill is located in an industrial area with no critical receptors within 1 mile.

Missoula County has been designated as a nonattainment area for the National Ambient Air Quality Standards (NAAQS) for particulate matter with an aerodynamic diameter < 10 microns (PM_{10}) and carbon monoxide (CO). Roseburg is located within these nonattainment areas.

C. Facility Background Information

Montana Air Quality Permit History

On September 16, 1986, Louisiana-Pacific was granted a general permit for their particle board plant, including the plant expansion and other related equipment, located near Missoula in Missoula County, Montana. The application was given **Permit #2303**.

The particle board plant existed in the Missoula area prior to 1968 and operated under **Permit #1274**. The original mill had a capacity of 100 million square feet of ¾-inch particle board. Louisiana-Pacific expanded the mill capacity in 1987 by 50%, using the offsets provided by the closure of the Evans Products plant. The expanded mill had a capacity of 150 million square feet of ¾-inch particle board. The mill consisted of four rotary dryers, which were heated by the exhaust gases from the sander dust boiler, sander dust burner, and natural gas burners. The old press line utilized a batch press with a capacity of 100 million square feet of particle board on a ¾-inch basis. The 1987 expansion added two new wood particle dryers, two new predryers with a Coen sander dust burner, and a new press line with a continuous press. A GEKA200 natural gas heater was also added to heat the new press line.

The first permit modification, to add general fugitive dust control measures to the facility, was issued on March 20, 1992, and was given **Permit #2303-M**. On July 1, 1987, EPA promulgated new ambient air quality standards for PM_{10}. The annual standard is 50 micrograms per cubic meter and the 24-hour standard is 150 micrograms per cubic meter.

These standards were, in turn, adopted by the Montana Board of Health and Environmental Sciences on April 15, 1988. Due to violations of these standards, Missoula was designated as a PM_{10} nonattainment area. As a result of this designation, the Montana Department of Health and Environmental Sciences and the Missoula County Air Pollution Control Agency developed a plan to control these emissions and bring the area into compliance with the federal and state ambient air quality standards.

In order to identify the emission sources that were contributing to the violation of the PM_{10} standard, Missoula County conducted a chemical mass balance study (CMB) of the area. The Louisiana-Pacific mill was not identified as a significant contributor to the problem by this method, but fugitive dust was a problem at the plant and was addressed at all other point sources in nonattainment areas. Therefore, a permit modification was required in order to add general fugitive dust control measures to this facility.

Since the State implementation program (SIP) process did not identify this source as a significant contributor to the Missoula nonattainment problem, no emission limitations were changed or added to the permit. Only cyclone-controlled and fugitive dust sources were addressed in detail. Permit #2303-M replaced Permit #2303.

On August 9, 1993, **Permit #2303-02** was issued to Louisiana-Pacific for an alteration to their existing air quality permit to install a baghouse and controls to reduce emissions from an existing outside truck dump at the Missoula Particle board facility in Missoula, Montana. The outside truck dump was located at the southeastern end of the Louisiana-Pacific facility at 3300 Raser Drive.

The baghouse would pull approximately 27,470 cfm of air through the top of the existing surge bin on the truck dump. The surge bin is partially shrouded to allow air to enter along the top and sides of the truck when in the dumping position. The air is pulled towards the back and top of the shrouded surge bin and through the baghouse system. The efficiency of the baghouse is estimated to be 99.99%; however, the reduction of fugitive dust emissions was reduced by the amount of air that can be drawn through the baghouse system. With proper manifold ducting and skirting, an estimated average reduction of 90% fugitive emissions was expected. Permit #2303-02 replaced Permit #2303-M.

Louisiana-Pacific was issued **Permit #2303-03** on March 10, 1995, to replace two existing baghouses (BH100 and BH101) at the Missoula facility with two new baghouses. Louisiana-Pacific replaced the existing 26,680-cfm Clark baghouse on source PC 401A (forming machine) with a new 35,000-cfm Day Division Model 376 RFW_{10} baghouse (BH100). In addition, Louisiana-Pacific replaced the existing 26,680-cfm Clark baghouse on source PC 401B (forming machine) with a new 5,400-cfm Day Division Model 48 RFW-8 baghouse (BH101). The permit alteration resulted in a decrease of particulate matter emissions of approximately 10 tons per year because the combined flow from the new baghouses was less than the combined air flow from the two existing baghouses. Permit #2303-03 replaced Permit #2303-02.

Permit #2303-04 was issued to Louisiana-Pacific on March 9, 1997, to change the allowable particulate emission limitations for the baghouses, cyclones, particle board press vents, and the continuous press vents to more accurately reflect the actual particulate emissions from these sources. The majority of the emission limitations were decreased, although the cyclone and press vent fan limits were increased. Overall, the allowable emissions of the facility decreased by approximately 208 tons of particulate matter.

In addition, the alteration allowed Louisiana-Pacific to increase the outside storage capacity of the contaminated floor sweepings enclosure from 50 cubic yards to 50 units (370 cubic yards). Condition F.3 in Permit #2303-03 required that a control strategy for particulate be employed, which resulted in no increase in associated fugitive emissions. The control strategy proposed by

Louisiana-Pacific included containing the contaminated floor sweepings within the three-sided enclosure and covering the exposed sides with a screen. The Department approved this control strategy with the caveat that if the fugitive emissions were not controlled by the screen, the Department would require an alternative control strategy be employed. Finally, Permit #2303-04 clarified permit conditions, updated the facility's configuration, incorporated Permit **#1274**, and updated the permit with current rule citations and permit language.

Permit #2303-05 was issued to Louisiana-Pacific on June 29, 1997, after Louisiana-Pacific requested that the Department modify the air quality permit to clarify language concerning the electric eye in the sander dust boiler abort stack. The language in Section II.G.1 was changed to require corrective action when emissions to atmosphere exceeded 20%. The electric eye monitors the boiler exhaust gas, even when it is not being emitted directly to atmosphere. A sentence stating that data from the monitor need not be recorded unless required by the Department was also put back into the permit.

Permit #2303-06 was issued on July 6, 1998. Louisiana-Pacific requested that the Department modify the requirements for the contaminated floor sweepings from a fixed screen, for the control of fugitives, to a fixed roof enclosure. Emissions were expected to decrease with this modification, as the new roof would improve the control of fugitives, offering more protection than the screen system being replaced. The new roof also facilitated the loading and unloading of sweepings from the three-sided bunker. The above floor sweepings bunker was allowed by the previous permit, and this permit modification simply updated the permit to recognize the improvement to the storage bunker.

Permit #2303-07 was issued to Louisiana-Pacific on May 17, 1999. This permit alteration allowed Louisiana-Pacific to rebuild the Line 1 press. The rebuilt press was expected to result in smoother board from Line 1, and thus a decrease in the amount of sanding necessary. The reduced sanding was expected to decrease the sander dust burned at the facility. Louisiana-Pacific decided to make up the additional heat requirement with natural gas.

The rebuild of the press allowed Louisiana-Pacific to increase production of Line 1 from approximately 131 $MMft^2$/year to 160 $MMft^2$/year. All emissions resulting from the debottlenecking were considered, to determine whether the change would result in a major modification subject to the requirements of the New Source Review Program (NSR) and, in particular, the Prevention of Significant Deterioration (PSD) requirements.

Louisiana-Pacific proposed, and the Department agreed, to base the actual emissions from the facility on the years 1993 and 1994. The years 1993 and 1994 were considered most representative for Line 1 because of the degradation of the press during the last several years. Based on the past actual to future potential test, the emissions from the press project would exceed significance levels for both particulate matter and PM_{10}. However, because of the addition of new control equipment, Louisiana-Pacific reduced the net emission increases of particulate matter and PM_{10} to less than significance levels. Therefore, the requirements of the NSR/PSD program did not apply to this project.

As part of this permit action, Louisiana-Pacific proposed to implement the following emission controls at the facility:

1. A cover and curtains over the Line 2 Reject Dump;

2. A cover over the reclaim hopper;

3. A cover over the lift portion of the outside truck dump;

4. A baghouse in milling and drying (M&D) to control three dryer loop vents and the coarse refiner loop vent;

5. A limit on the allowable emissions from the dryers and from the raw material handling fugitives;
6. A limit on the amount of sander dust which may be combusted in the Coen Burner; and

7. A change in the use of process wax addition to reduce evaporative losses. The wax injection to the sawdust was changed from injection prior to the dryers to injection after the dryers.

The method of calculating the emissions from the raw material handling at the facility was also modified in this permit. The control efficiencies for several of the processes increased because of the additional controls required by the permit. The control efficiency for the outside truck dump increased from 90% to 99% because Louisiana-Pacific was required to install a full cover over the lift portion of the truck dump. The control efficiency for the pile reclaim hopper increased from 0% to 50% because Louisiana-Pacific constructed an earthen berm around the exposed sides of the pile and was required by permit to install a cover over the hopper. The control efficiency for the radial stacker increased from 25% to 50% because of the construction of the earthen berm.

The testing requirements for the dryers and predryers were modified in this permit to require the testing of each dryer and predryer once every 5-years. The previous testing requirement was inconsistent with other sources. Permit #2303-07 replaced Permit #2303-06.

On August 24, 2000, Louisiana-Pacific was issued **Permit #2303-08** in accordance with NSR/PSD. Louisiana-Pacific requested an alteration to their permit on January 7, 2000. The Department requested additional information from Louisiana-Pacific and received the final submittal on June 9, 2000. In 1979, Louisiana-Pacific installed a 50-MMBtu/hr Roemmc sander dust/natural gas-fired burner, replaced the original bullnose line with Bullnose #1, and made various changes to baghouses and wood waste handling systems. In 1986-1987, Louisiana-Pacific installed a second production line (Line 2) with associated sources, a 35-MMBtu/hr Coen sander dust/natural gas-fired burner, Predryers 1 and 2, and the GEKA200.

In 1991, Louisiana-Pacific installed Bullnose #2. The changes made in each of these years triggered the NSR program for PSD regulations; however, none of the changes were permitted at the time through the PSD regulations. In 1979, Louisiana-Pacific triggered the PSD regulations for CO and Oxides of Nitrogen (NO_x). In 1986-1987, Louisiana-Pacific triggered the PSD regulations for NO_x and Volatile Organic Compounds (VOCs). In 1991, Louisiana-Pacific triggered the PSD regulations for VOCs. Louisiana-Pacific proposed to permit the 1979, 1986-1987, and 1991 changes in accordance with the PSD regulations. Permit #2303-08 replaced Permit #2303-07.

The Department received comments from Louisiana-Pacific on the preliminary determination (PD) on August 3, 2000. Based on the comments submitted by Louisiana-Pacific, several changes were made to the permit prior to issuance of the Department decision (DD). Most notably, the emission limits for both the Coen and the Roemmc burners were changed. The NO_x, CO, and VOC emission limits placed in the PD for the Coen Burner were calculated by averaging the emissions from burning sander dust and natural gas. While Louisiana-Pacific could easily comply with this limit while burning natural gas, they would be unable to comply with this limit while burning sander dust. The Department changed the limit in the permit to correspond with the emissions from burning sander dust. However, Louisiana-Pacific is required to burn sander dust during any compliance source tests that are conducted to monitor compliance with the NO_x and CO emission limits for the Coen Burner.

Louisiana-Pacific requested an increase in the NO_x emission limit for the Roemmc Burner. Louisiana-Pacific submitted supporting information with their PD comments indicating that

the plant would have problems complying with the limit in the PD during the winter months. Because the Department determined that "no additional control" constitutes the best available control technology (BACT) for NO_x, CO, and VOC emissions, the Department determined that changing the emission limit for NO_x and CO would be appropriate. The Department based the new emission limits on the emission factors proposed by Louisiana-Pacific in Permit Application #2303-08 and on the unit operating at 2 tons per hour. A complete copy of Louisiana-Pacific's comments on the PD and the Department's responses to the comments are located on file with the Department.

On March 2, 2001, Louisiana-Pacific was issued Permit **#2303-09** by the Department for a change in emission limits for the Roemmc Burner. Based on more recent source test information, Louisiana-Pacific requested new emission limits for the Roemmc Burner that more accurately reflected the emissions from the unit. The emission limits for NO_x, CO, and VOC were increased for the Roemmc Burner during this permit action. Furthermore, the Department removed the requirements and limitations regarding cyclones from the permit, because there are no longer any cyclones that are considered emitting units at Louisiana-Pacific. All cyclones have either been completely removed from the facility or are no longer attached and in use at the facility.

Title V Operating Permit History

On July 26, 2002, Title V Operating Permit **#OP2303-00** was issued to Louisiana-Pacific's Missoula Particleboard Facility. The permit includes all applicable conditions under the Title V of the Federal Clean Air Act.

On February 21, 2003, Louisiana-Pacific and Roseburg submitted a request to transfer the permit for the facility from Louisiana-Pacific to Roseburg. In addition, on March 20, 2003, Roseburg submitted a request to update the responsible official of the facility. The permit action was an administrative amendment to make the changes and to update rule citations in the permit. Appendix A (Rule Citations) was removed from the permit because it no longer applies. Permit **#OP2303-01** replaced permit #OP2303-00.

D. Current Permit Action

On July 17, 2003, the Department received a letter from Roseburg indicating various typographical errors and permit condition discrepancies contained in Title V operating permit #OP2303-01. In addition, since Roseburg is now subject to 40 CFR Part 63, Subpart JJ, National Emissions Standards for Wood Furniture Manufacturing Operations, the Department determined that it was appropriate to include these requirements under the Remanufacturing Facility portion of the operating permit (Section III.BB). The current permit action modifies Section III.BB, Remanufacturing Facility, to include applicable 40 CFR 63, Subpart JJ requirements and modifies various typographical errors and permit condition discrepancies indicated in the letter received by the Department on July 17, 2003.

Further, on November 10, 2003, the Department received a letter from Roseburg indicating a change in the responsible official from Art Green, the former plant manager, to Ken Cole, the current plant manager. Section I of Roseburg's operating permit has been modified to reflect this change. Operating permit **#OP2303-02** replaces operating permit #OP2303-01.

E. Compliance Designation

As of the date of this permit, Roseburg is in compliance with all applicable air quality rules and regulations. The last inspection of the Roseburg facility occurred on May 22, 2003.

The Department receives frequent complaints regarding the particulate emissions from the facility. The complaints are verified and passed along to Roseburg. The majority of the complaints are directly related to windblown emissions. Roseburg is required to take reasonable precautions to minimize dust emissions. Compliance with Montana Air Quality Permit #2303 is an ongoing process that includes production limits, emission limits, source testing, etc. The filing of complaints does not necessarily equate to non-compliance.

II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

This plant processes raw wood fiber into particle board 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 particle board 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 the sander dust burners. This plant also contains a remanufacturing (reman) section, which processes the particle board into finished wood that is used in furniture production.

B. Emission Units and Pollution Control Device Identification

The Roseburg Particleboard Plant includes the following process and control equipment.

1. Six direct-contact wood particle dryers with multiclone control (DRY100, DRY101, DRY102, DRY103, DRY200, and DRY201). Each of the six dryers has a rated capacity of 20,000 lb/hr of wet wood (annual average hourly rate). These dryers are heated with the exhaust gases from the sander dust boiler (Boiler #1), the Roemmc sander dust burner (Roemmc), and the Coen sander dust burner (Coen). The sander dust boiler has a capacity of 55 million Btu/hr, the Roemmc sander dust burner capacity is 50 million Btu/hr, and the Coen sander dust burner capacity is 35 million Btu/hr. The Coen and Boiler #1 can also be fueled with natural gas. The Roemmc is only fueled with sander dust, except for the pilot flame, which is fueled with natural gas. However, if the Roemmc is for some reason inoperable, the six final dryers that are otherwise dependent on the Roemmc for their hot gases, may be fired individually on natural gas. The boiler combustion unit has an abort stack to divert hot gases to the atmosphere. The Coen and Roemmc combustion units have an open abort stack that allows excess combustion gases to escape to the atmosphere under normal operation and in case of fire or other problems.

2. Two direct-contact predryers with multiclone control (DRY500 and DRY501). Each predryer has a rated capacity of 17,000 lb/hr of wet wood (annual average hourly rate) and is heated with the exhaust from the Coen sander dust burner.

3. A GEKA hot oil heater (GEKA200) with a capacity of 20 million Btu/hr. The heater is fired with natural gas. The hot oil is used in the continuous press line.

4. A steam-heated batch hydraulic press is used to compress the particle board mat formed at the older production line (Line 1) to the desired thickness. Air emissions generated from the pressing of the mat are emitted through a series of press area ventilation fans (Press Vents A, B, C, D on Line 1 – aka PRESS100). The newer manufacturing line (Line 2) uses a continuous style press, which is heated using

thermal oil from the GEKA hot oil heater. The emissions generated from pressing at this location are emitted to the atmosphere through ventilation fans (Press Vents A, B, C, and D on Line 2 – aka PRESS200).

5. Wood waste baghouses

Baghouse Name	Number	Flow Rate (cfm)	Controlled Point
Outside truck dump	BH 50	27470	Outside Truck dump
Milling and Drying	BH 55	18000	Dryer loop vents and Coarse refiner loop vent
Line 1 Reject	BH 100	40000	Line 1 Reject System
Reject Receiver	BH 101	3000	Form machine to core
5X25	BH 102	28800	5X25 Saws & hog
5X16	BH 103	28800	5X16 Saws & hog
Line 2 Face	BH 200	26680	Face Air System
Line 2 Core	BH 201	26680	Core Air System
Line 2 Press Line	BH 202	30000	
Line 2 Sawline	BH 203	30000	Saws & hog edging
Line 2 Receiver	BH 204	8000	Saws & hog to storage
Six-Head Sander	BH300A, BH300B	26000 Each	Six-Head Sander System
Six-Head and REMAN Receiver	BH 301	4000	Six-Head Sander & REMAN Flatline Relay System
Eight-Head Sander	BH 302, BH 303	47000 Each	Eight-Head Sander System
Eight-Head Receiver	BH 304	10000	Sander System Relay
REMAN Sander	BH 400	20000	REMAN Sander
Bullnose Baghouse	BH 401	27000	Shilling & Bullnose Saw System
REMAN Receiver	BH 404	1700	Shilling & Bullnose Saw Relay

6. Fugitive dust from receiving, storing, and handling of raw material wood particles. This includes the receiving of shavings and sawdust by truck, unloading and conveying to the press line, the indoor storage area, or the outdoor storage pile via the radial stacker. It also includes fugitive emissions from the reclaiming of this material from the outdoor storage pile by front-end loader and conveying back to the press line.

7. Six natural gas burners, one for each dryer. Each of the dryers is equipped with a natural gas burner as an additional heat source. The natural gas burners would be used if the Roemmc was not operating or if the dryers needed an additional or an alternative source of heat. The burners for Dryer #1, Dryer #2, and Dryer #5 are each 28 MMBtu. The burners for Dryer #3, Dryer #4, and Dryer #6 are each 22 MMBtu.

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emission unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any hazardous air pollutant, and is not regulated by any applicable requirement other than a generally applicable requirement. The list of insignificant emitting units at the Roseburg facility includes auxiliary diesel generators, degreasing, portable heaters, wax pump, gas-powered sump pump, fire pond dredging, diesel tank, gasoline storage tank, wax tanks (2), resin tanks (10), day-use wax tanks (1), propane storage tanks, general repair and maintenance, machining general maintenance, 52-gallon brine tanks (2), and a septic system with lift system.

III. PERMIT TERMS

A. Emission Limits and Standards

1. Facility-Wide

The facility wide emission limits include limitations on visible air contaminants, airborne particulate matter, particulate matter from fuel-burning equipment, particulate matter from industrial processes, sulfur oxide emissions from sulfur in fuel (liquid and gaseous), operations during emergency episodes, and various reporting and recordkeeping requirements. These emission limits are applicable to the facility and/or to specific emission units located at the facility.

Roseburg's visible air contaminants are limited to less than 40% opacity averaged over 6 consecutive minutes for all sources installed on or before November 23, 1968, unless otherwise specified by rule or in this permit. Furthermore, Roseburg's visible air contaminants from all sources installed after November 23, 1968, are limited to less than 20% opacity averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

Roseburg must take reasonable precautions to minimize airborne particulate matter prior to producing, handling, transporting, or storing any material. Furthermore, Roseburg shall not use any street, road, or parking lot, or operate any construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter are limited to less than 20% opacity averaged over 6 consecutive minutes, unless otherwise specified by rule or in this permit.

Roseburg is limited on the emissions of particulate matter from the combustion of fuel. The applicable limitation is based on the installation date of the combustion device and the heat input capacity of the device.

Roseburg is limited on the amount of particulate matter that can be discharged from any operation, process, or activity into the outdoor atmosphere. The appropriate emission limit is based on the process weight rate of the respective emitting unit. Certain units within the Roseburg facility contain more stringent emission limits than the limits that would apply based on the process weight rate. For those units, the process weight rate limitation was not included as an applicable requirement because the existing condition was more stringent.

The Roseburg facility is also limited on the sulfur oxide emissions that are allowed from the facility. Roseburg is not allowed to burn any liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. In addition, Roseburg may not burn any gaseous fuels containing sulfur in excess of 50 grains per 100 cubic feet of gaseous fuel.

The Roseburg facility is subject to the emergency episode plan 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). Each stationary source within Missoula County that emits or is capable of emitting 25 tons per year or more of PM_{10}, SO_2, CO, O_3, or NO_2 must have an abatement plan for reducing emissions of such pollutants during an air pollutant emergency episode. The plan, which is subject to review and approval by the Missoula City-County Health Department, must sufficiently demonstrate the ability of the source to reduce emissions as required under each stage of the emergency episode avoidance plan. The Missoula City-County Health Department may require sources to periodically review and update their abatement plans and submit them to Missoula City-County Health for review and approval.

2. Plant-Wide

In addition to those limits previously identified as "facility-wide" emission limits, the following emission limits apply "plant-wide" at the Roseburg facility. Similar to the facility-wide limitations, the plant-wide emissions are limited to less than 20% opacity from all sources installed after November 23, 1968.
Operation of Line 1 is limited to 8500 hours during any rolling 12-month period.
Production from Line 2 is limited to 75 million square feet of ¾-inch particle board during any rolling 12-month period.

Control equipment must be installed, operated, and maintained as specified in Permit Application #2303-07 and Permit #OP2303-00. Permitting decisions were made based on the control equipment that was specified in Permit Application #2303-07. Furthermore, all sander dust handling systems must be enclosed and equipped with a baghouse to minimize fugitive particulate emissions.

Roseburg is required to conduct ambient monitoring as required by Appendix G. The ambient monitoring began June 1, 2001.
Paving or a dust suppressant is required on all routinely used haul roads to minimize fugitive emissions. The opacity from the haul roads shall not exceed 20%.

Roseburg is not allowed to store any contaminated floor sweepings outdoors. This requirement is intended to reduce the possibility of the material becoming airborne. Currently, Roseburg is limited to storing no more than 50 units (370 cubic yards) of contaminated floor sweepings in the contaminated floor sweepings building.

Roseburg is required to plant and maintain vegetation on the earthen berm to minimize emissions from the raw material storage pile.

Total particulate emissions from the raw material storage pile are limited to 928 pounds per day and 30 tons per year. PM_{10} emissions from the raw material storage pile are limited to 334 pounds per day and 9.9 tons per year.

3. Dryers (DRY100, DRY101, DRY102, DRY103, DRY200, DRY201)

Emissions from the dryers at the Roseburg facility are limited to less than 20% opacity.

The total particulate matter and PM_{10} emissions from each dryer are also limited. Roseburg is required to operate and maintain multiclones as part of the effort of complying with the total particulate matter and PM_{10} emission limits. Furthermore, Roseburg is required to install and operate temperature sensors with remote readout and audible alarm on the inlet of all dryers. The alarm system shall become activated when the exhaust gas exceeds 475ºF.

In addition, the combined production from DRY200 and DRY201 is limited to 168,000 bone-dry tons per rolling 12-month period.

4. Predryers (DRY500 and DRY501)

Similar to the dryers, the predryers at the Roseburg facility are limited to less than 20% opacity.

Each predryer is also limited in total particulate matter and PM_{10} emissions. Roseburg is required to operate and maintain multiclones as part of the effort of complying with the total particulate matter and PM_{10} emission limits. Furthermore, Roseburg is required to install and operate temperature sensors with remote readout

and audible alarm on the inlet of all predryers. The alarm system shall become activated when the dryer inlet temperature exceeds 475ºF.

In addition, the combined production from DRY500 and DRY501 is limited to 35,000 bone-dry tons per rolling 12-month period. The production limitation has resulted in a decrease in potential VOC emissions.

5. Baghouses (BH50, BH55, BH100, BH101, BH102, BH103, BH200, BH201, BH202, BH203, BH204, BH300A, BH300B, BH301, BH302, BH303, BH304, BH400, BH401, BH404)

The baghouses at the Roseburg facility are limited to less than 20% opacity averaged over 6 consecutive minutes.

Each baghouse is limited in total particulate matter emissions, PM_{10} emissions, and flow rate. The particulate limits range from grain-loading limits to the limits that were established in previous preconstruction permits. The flow-rate limits have been incorporated from the preconstruction permit.

For those baghouses in the Title V permit that already contain a more stringent particulate limit, the limits established through the process weight rule were removed from the permit. When compared to the emission limits currently established for the baghouses, the regulatory limit established through the process weight rule is less stringent.

6. Press Vents (Press Vents A, B, C, and D on Line 1; Press Vents A, B, C, and D on Line 2)

Opacity limitations also apply to the press vent emissions from Line 1 and Line 2. The emissions from each of the press vents shall not exhibit an opacity of 20% or greater averaged over 6-consecutive minutes.

The total particulate matter and PM_{10} emissions from each of the press vents are also limited. The total particulate matter and PM_{10} limits will require Roseburg to stay below 8.0 lb/hr for Line 1 and 6.5 lb/hr for Line 2. The particulate matter limit that would result from the process weight rule would be less stringent than the limit that is currently contained in the preconstruction permit (and the Title V permit). For this reason, the particulate matter limit that would be based on the process weight rule was removed from this section of the Title V permit.

7. Boiler (Boiler #1)

The emissions from Boiler #1 are limited to exhibiting an opacity of 20% or less averaged over 6-consecutive minutes. Furthermore, particulate from fuel combustion, total particulate matter, and PM_{10} emissions are also limited. The particulate from fuel combustion is limited to a pound-per-MMBtu value that is determined by using the heat-input capacity of the boiler. Both the total particulate matter and PM_{10} limits are 19.8 lb/hr of operation. The particulate matter limit that would result from ARM 17.8.309 would be 22.18 lb/hr and would be less stringent than the limit that is currently contained in the preconstruction permit (and the Title V permit). For this reason, the particulate matter limit that would be based on ARM 17.8.309 was removed from this section of the Title V permit.

8. Burners (Roemmc Burner and Coen Burner)

Limitations have been placed on the Roemmc Burner and the Coen Burner for opacity,

particulate from fuel combustion, sander dust combustion, NO_x emissions, CO emissions, and VOC emissions. Each of these sources shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. The particulate from fuel combustion for each of these sources is limited to a pound-per-MMBtu value that is determined by using the heat-input capacity of the burner.
The Roemmc Burner is limited to combusting 23000 tons or less of sander dust per rolling 12-month period. Emissions of NO_x, CO, and VOC from the Roemmc Burner shall not exceed 115.0 lb/hr, 100.0 lb/hr, and 0.35 lb/hr, respectively.

Similarly, the Coen Burner is limited on the amount of sander dust that it can combust. The Coen Burner is limited to combusting 5000 tons or less of sander dust per rolling 12-month period. Furthermore, the Coen Burner is limited to combusting 292 MMscf or less of natural gas per rolling 12-month period. Emissions of NO_x, CO, and VOC from the Coen Burner shall not exceed 73.1 lb/hr, 28.4 lb/hr, and 0.25 lb/hr, respectively. Both the Roemmc Burner and the Coen Burner are potentially required to have an opacity monitor. Roseburg is required to install and operate an opacity monitor on each of the burner exhausts as required by the Department.

9. Heater (GEKA200)

Limitations have been placed on the GEKA200 for opacity, particulate from fuel combustion, natural gas combustion, and the potential requirement to install and operate an opacity monitor. Emissions from the GEKA200 shall not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. The particulate from fuel combustion for the GEKA200 is limited to a pound-per-MMBtu value that is determined by using the heat-input capacity.

The GEKA200 is limited in the amount of natural gas that can be combusted. The GEKA200 is limited to combusting 166.9 MMscf or less of natural gas per rolling 12-month period.

The GEKA200 is potentially required to have an opacity monitor. Roseburg is required to install and operate an opacity monitor on the GEKA200, as required by the Department.

10. Fugitives (FUG50, FUG51, FUG52)

The fugitive emissions from FUG50, FUG51, and FUG52 are limited to less than 20% opacity averaged over 6 consecutive minutes.

11. Remanufacturing (REMAN) Process

The emissions from REMAN are limited to less than 20% opacity averaged over 6 consecutive minutes.

The production of painted material from Bullnose #2 is limited to 14.7-million linear feet per rolling 12-month period.

Paints used on Roseburg's paintline must be water-based and fillers must be U.V. curable.

The REMAN process is subject to all applicable requirements contained in 40 CFR 63, Subpart JJ.

12. Natural Gas Burners (DRY-NG 100, DRY-NG 101, DRY-NG 102, DRY-NG 103, DRY-NG 200, DRY-NG 201)

The opacity limitation for each of the burners is 20% averaged over any 6-minute period. Similar to the weekly visual surveys that are required for other sources at the facility, Roseburg is also required to conduct weekly visual surveys for each of the natural gas burners. However, the visual survey point for the dryers would be the exhaust point, which occurs at the dryer exhaust. Roseburg is already required to conduct weekly visual surveys at this point, so the natural gas burner emissions would be surveyed at the same time as the dryer emissions. In addition to the opacity limitation for each of the burners, the particulate from fuel combustion and sulfur compounds in fuel are also limited for the burners.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required by any applicable requirement be contained in the operating permit. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit. The requirement for testing, monitoring, recordkeeping, reporting, and compliance certification, sufficient to assure compliance, does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions.

When compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by lack of regular monitoring, and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (i.e., no monitoring) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring and/or recordkeeping for all generally applicable requirements such as ARM 17.8.304, ARM 17.8.309, ARM 17.8.322, ARM 17.8.324, and ARM 17.8.749. However, the Department may request additional testing to determine compliance with the emission limits and standards. If it is determined through testing, using test methods identified in the Montana Source Test Protocol and Procedures Manual, that any emission unit is out of compliance with any applicable requirement, Roseburg will not be shielded from an enforcement action even if the required monitoring methods listed in the permit indicate compliance with the applicable requirement.

C. Test Methods and Procedures

Various test methods and procedures have been incorporated into this permit to assist in determining compliance with applicable limitations. Numerous limitations within the permit identify a routine time frame for conducting emission tests (e.g. every 5 years or as required by the Department). In either case, the testing that is conducted or that may be conducted must be done in accordance with the Montana Source Test Protocol and Procedures Manual. The Montana Source Test Protocol and Procedures Manual requires that process rates during testing must be at specific conditions that are representative of maximum operating capacity or maximum permitted capacity unless otherwise agreed upon by the Department and the source. Furthermore, the Department has the authority to require additional source testing (for example, more often than every 5 years) if necessary in accordance with ARM 17.8.105.

1. Facility-Wide

The facility-wide emission limits are intended to identify conditions that are generally applicable to the facility. The section labeled "Facility-Wide" Emission Limits does not include the method of compliance monitoring or the frequency.

Each of the limitations that are applicable to a specific emitting unit is identified with the conditions for that limit. The appropriate test methods and procedures are identified with the corresponding emitting unit, as well.

2. Plant-Wide

Roseburg is required to conduct Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitation that is identified for the plant. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual.

Roseburg is required to log the hours of operation of Line 1 and the production from Line 2 on a monthly basis to monitor compliance with the limitations in the permit.

Roseburg is required to certify compliance with several requirements in Permit #OP2303-02 for the plant-wide conditions. The certifications shall indicate whether or not Roseburg is in compliance with the particular limit.

Roseburg shall submit the ambient air monitoring data as required by Appendix G of Permit #OP2303-02.

Roseburg shall calculate the daily and annual total particulate and PM_{10} emissions in accordance with the equations provided in Section III.B.26 of Permit #OP2303-02.

3. Dryers (DRY100, DRY102, DRY103, DRY 101, DRY200, DRY201)

Roseburg shall conduct weekly visual surveys on the combined visible emissions from DRY100, DRY101, DRY102, DRY103, and BH200 and BH201, if Roseburg chooses to vent the baghouses through the combined stack. Specifically, Roseburg is required to vent the emissions from DRY100, DRY101, DRY102, and DRY103 into one common combined stack. Louisiana Pacific is allowed to route the emissions from BH200 and/or BH201 to the same common combined stack if they so choose. Regardless of which sources are venting to the combined stack (any combination of DRY100, DRY101, DRY102, DRY103, BH200, and BH201), emissions from the combined stack may not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. 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. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual.

Roseburg is required to perform Method 5 and Method 201A Source Tests once every 5 years to monitor compliance with the total particulate matter and PM_{10} emission limitations for DRY100, DRY101 DRY102, and DRY103. When Roseburg is venting the emissions from any combination of DRY100, DRY101, DRY102, DRY103, BH200, and BH201, the applicable emission limitation will be the sum total of the emission limits of each of the sources venting through the combined stack at the time of the source test.

Roseburg is required to certify compliance with several requirements in Permit #OP2303-02 for the dryers. The certifications shall indicate whether or not Roseburg is in compliance with the particular limit.

Furthermore, Roseburg is required to log the combined production from DRY200 and DRY201 and to compare the results with the limitations in the permit.

4. Predryers (DRY500 and DRY501)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations that are identified for the predryers. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the predryers weekly and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform Method 5 and Method 201A Source Tests every 5-years to monitor compliance with the total particulate matter and PM_{10} emission limitations.

Roseburg is required to certify compliance with several requirements in Permit #OP2303-02 for the dryers. The certifications shall indicate whether or not Roseburg is in compliance with the particular limit.

Furthermore, Roseburg is required to log the combined production from DRY500 and DRY501 and to compare the results with the limitations in the permit.

5. Baghouses (BH50, BH55, BH100, BH101, BH102, BH103, BH200, BH201, BH202, BH203, BH204, BH300A, BH300B, BH301, BH302, BH303, BH304, BH400, BH401, BH404)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations that are identified for the baghouses. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the baghouses weekly and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform Method 2, Method 5, and Method 201A Source Tests as required by the Department to monitor compliance with the flow rate, total particulate matter, and PM_{10} emission limitations.

Specifically for BH200 and BH201, Roseburg shall conduct weekly visual surveys on the combined visible emissions of DRY100, DRY101, DRY102, DRY103, and BH200 and BH201, if Roseburg chooses to vent the baghouses through the combined stack. Regardless of which sources are venting to the combined stack (any combination of DRY100, DRY101, DRY102, DRY103, BH200, and BH201), emissions from the combined stack may not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual.

Roseburg is required to perform Method 5 and Method 201A Source Tests once every 5 years to monitor compliance with the total particulate matter and PM_{10} emission limitations for DRY100, DRY101 DRY102, and DRY103. When Roseburg is venting the emissions from any combination of DRY100, DRY101, DRY102, DRY103, BH200, and BH201, the applicable emission limitation will be the sum total emission limit of each of the sources venting through the combined stack at the time of the source test.

6. Press Vents (Press Vents A, B, C, and D on Line 1 and Press Vents A, B, C, and D on Line 2)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations identified for the press vents. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the press vents weekly, and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform Method 5 and Method 201A Source Tests, as required by the Department, to monitor compliance with the total particulate matter and PM_{10} emission limitations.

7. Boiler (Boiler #1)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitation that is identified for the boiler. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the boiler weekly and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform Method 5 and Method 201A Source Tests, as required by the Department, to monitor compliance with the total particulate matter and PM_{10} emission limitations.

Roseburg is required to certify compliance with several requirements in Permit #OP2303-02 for the boiler. The certifications shall indicate whether or not Roseburg is in compliance with the particular limit.

8. Burners (Roemmc Burner and Coen Burner)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations that are identified for the burners. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the burners weekly and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform Method 5, Method 7E, Method 10, and Method 18, Method 25, or Method 25A Source Tests, as required by the Department, to monitor compliance with the particulate from fuel combustion, NO_x, CO, and VOC emission limitations.

Furthermore, Roseburg is required to log the combustion of sander dust from the Roemmc and combustion of sander dust and natural gas from the Coen and to compare the results with the limitations in the permit.

If required to install and operate an opacity monitor(s), Roseburg must certify that the opacity monitor(s) is installed and operating on the Roemmc and Coen Burners. The certifications shall indicate whether or not Roseburg is in compliance with the particular limit.

9. Heater (GEKA200)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitation that is identified for the heater. The Method 9 Source Tests must be performed in accordance with the

Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the heater weekly and contain or minimize any excess fugitive emissions that are noted.

Roseburg must perform a Method 5 Source Test, as required by the Department, to monitor compliance with the particulate from fuel combustion limitation.

Furthermore, Roseburg is required to log the combustion of natural gas from the heater and to compare the results with the limitation in the permit.

If required to install and operate an opacity monitor, Roseburg must certify that the opacity monitor is installed and operating on the heater. The certification shall indicate whether or not Roseburg is in compliance with the limit.

10. Fugitives (FUG50, FUG51, FUG52)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations that are identified for the fugitive sources. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the fugitive sources weekly and contain or minimize any excess fugitive emissions that are noted.

11. Remanufacturing (REMAN) Process

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitation that is identified for REMAN. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the REMAN weekly and contain or minimize any excess emissions that are noted.

Roseburg is required to log the production of painted material from Bullnose #2 and to compare the results with the limitation in the permit.

Roseburg must certify that paints used on the paintline are water based and that fillers are U.V. curable. The certification shall indicate whether or not Roseburg is in compliance with the limit.

12. Natural Gas Burners (DRY-NG 100, DRY-NG 101, DRY-NG 102, DRY-NG 103, DRY-NG 200, DRY-NG 201)

Roseburg is required to conduct official Method 9 Source Tests, as required by the Department, to verify compliance with the opacity limitations that are identified for the burners. The Method 9 Source Tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual. Furthermore, Roseburg is required to visually survey the burners weekly and contain or minimize any excess emissions that are noted.

The compliance method for the particulate from fuel combustion and sulfur compounds in fuel requirements is to only burn pipeline quality natural gas in the burners.

13. Miscellaneous

An alternative operating scenario was added to the permit for the Line 1 Dryers,

BH200, and BH201 to allow Roseburg to disconnect the combined stack should there occur a violation of an applicable emission limit. While engineering to date does not indicate that the combined stack would lead to a violation of any emissions limitation applicable to those sources venting from the combined stack, Roseburg has asked the Department to account for such a circumstance. Therefore, the Department acknowledges the possibility of violations attributed to the combined stack. The Department also acknowledges that construction of the combined stack was undertaken to address monitoring compliance with the opacity limit for the Line 1 Dryers. Should Roseburg establish that a violation of a mass emissions limit occurred due solely to the combined stack (i.e., the violation abates upon de-coupling the combined stack and venting the sources individually), the Department will consider that fact in exercising its enforcement discretion. In that situation, Roseburg would be expected to undertake immediate corrective action to abate the violation.

D. Recordkeeping Requirements

The recordkeeping provisions shall be sufficient to meet the provisions of the monitoring requirements and shall include, as necessary, the installation, use, and maintenance of the monitoring equipment or methods. The following information shall also be provided as necessary: the date the analyses were performed, the place and time of the sampling, the company or entity performing the sampling, the analytical techniques or methods used, the results of such analyses, and the operating conditions at the time of the analyses. Retention of the records of all required monitoring data and support information shall be for a period of at least 5 years from the date of measurement. Support information includes all calibration and maintenance records and copies of all reports required by the operating permit.

E. Reporting Requirements

Roseburg is required to submit, to the Department, reports of any required monitoring at least every 6 months and to annually certify compliance with the applicable requirements contained in the permit. All deviations from permit requirements must be clearly identified in these reports. All reports must be certified by a responsible official. Roseburg is also required to promptly report any deviations from the permit requirements due to upset conditions, and the probable cause of the upset condition, along with any corrective actions or preventive measures taken.

F. Public Notice

In accordance with ARM 17.8.132, a public notice was published in the *Missoulian* newspaper on or before January 29, 2004 The Department provided a public comment period on the draft operating permit from January 29, 2004, through March 1, 2004. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by March 1, 2004, will be summarized, along with the Department's responses, in the following table. All comments received during the public comment period will be promptly forwarded to Roseburg so they may have an opportunity to respond to these comments as well.

Summary of Public Comments On Draft Permit

Person/Group Commenting	Comment	Department Response
None	NA	NA

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
III.D.11	Language change to Section III.D.5 regarding audible alarm for Line 2 Dryer operators only needs to be incorporated into Section III.D.11.	Change made by Department for proposed permit issuance.
Table, Section III.G	Table needs to be updated to include the proper flow-rate of 32,000 cfm modified in Section III.G.4.	Change made by Department for proposed permit issuance.

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
None	NA	NA

IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

Section IV of the operating permit "Non-applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that Roseburg identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Requirements not Identified in the Operating Permit

Applicable Requirement	Reason
Sub-Chapter 1 – General Provisions	
ARM 17.8.101 Definitions ARM 17.8.103 Incorporation by Reference	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.105 Testing Requirements ARM 17.8.106 Source Testing Protocol	These rules are applicable to the facility and any compliance source testing conducted at the facility.
ARM 17.8.120 Variance Procedures – Initial Application ARM 17.8.121 Variance Procedures – Renewal Exemption Application ARM 17.8.130 Enforcement Procedures—Notice of Violation—Order to Take Corrective Action ARM 17.8.131 Enforcement Procedures—Appeal to Board ARM 17.8.140 Rehearing Procedures—Form and Filing of Petition ARM 17.8.141 Rehearing Procedures—Filing Requirements ARM 17.8.142 Rehearing Procedures—Board Review	These are procedural rules that have specific requirements that may become relevant to a major source during the permit span.
Sub-Chapter 2 – Ambient Air Quality	
ARM 17.8.201 Definitions	This rule consists of regulatory definitions. This rule does not have specific requirements associated with it.

Applicable Requirement	Reason
ARM 17.8.204 Ambient Air Monitoring ARM 17.8.205 Enforceability ARM 17.8.206 Methods and Data ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide ARM 17.8.230 Fluoride in Forage	These rules are always applicable to a major source and may contain specific requirements for compliance.
Sub-Chapter 3 – Emission Standards	
ARM 17.8.301 Definitions ARM 17.8.302 Incorporation by Reference	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.326 Prohibited Materials for Wood or Coal Stoves ARM 17.8.340 Standard of Performance for New Stationary Sources ARM 17.8.341 Emission Standards for Hazardous Air Pollutants	The following regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit.
ARM 17.8.330 Definitions	This rule consists of regulatory definitions. This type of rule does not have specific requirements associated with it.
Sub-Chapter 4 - Stack Heights	
ARM 17.8.401 Definitions	This rule consists of regulatory definitions. This type of rule does not have specific requirements associated with it.
ARM 17.8.403 Exemptions	This is a procedural rule that has specific requirements that may become relevant to the source during the permit span.
Sub-Chapter 5 - Air Quality Permit Application, Operation and Open Burning Fees	
ARM 17.8.501 Definitions	This rule consists of regulatory definitions. This type of rule does not have specific requirements associated with it.
ARM 17.8.510 Annual Review ARM 17.8.511 Permit Fee Assessment Appeal Procedures ARM 17.8.514 Air Quality Open Burning Fees ARM 17.8.515 Air Quality Open Burning Fees for Conditional, Emergency, Christmas Tree Waste, and Commercial Film Production Open Burning Permits	These are procedural rules that have specific requirements that may become relevant to the source during the permit span.
Sub-Chapter 6 - Open Burning	

Applicable Requirement	Reason
ARM 17.8.601 Definitions	This rule consists of definitions for open burning. This rule does not have specific requirements associated with it.
ARM 17.8.611 Emergency Open Burning Permits ARM 17.8.612 Conditional Air Quality Open Burning Permits ARM 17.8.613 Christmas Tree Waste Open Burning Permits ARM 17.8.614 Commercial Film Production Open Burning Permits ARM 17.8.615 Firefighter Training	The following regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit.
Sub-Chapter 7 – Permit, Construction and Operation of Air Contaminant Sources	
ARM 17.8.740 Definitions ARM 17.8.767 Incorporation by Reference	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.748 New or Modified Emitting Units – Permit Application Requirements ARM 17.8.756 Compliance with Other Statutes or Rules ARM 17.8.762 Duration of Permit ARM 17.8.763 Revocation of Permit ARM 17.8.765 Transfer of Permit	These regulations may not be applicable to the source at this time. However, these regulations may become applicable to the source during the life of the permit.
Sub-Chapter 8 - Prevention of Significant Deterioration	
ARM 17.8.801 Sources Impacting Federal Class 1 Areas -- Additional Requirements ARM 17.8.802 Public Participation	These are procedural rules that have specific requirements that may become relevant to the source during the permit span.
ARM 17.8.804 Ambient Air Increments ARM 17.8.807 Exclusion from Increment Consumption ARM 17.8.809 Stack Heights ARM 17.8.818 Review of Major Stationary Sources and Major Modifications—Source Applicability and Exemptions ARM 17.8.819 Control Technology Review ARM 17.8.820 Source Impact Analysis ARM 17.8.821 Air Quality Models ARM 17.8.822 Air Quality Analysis ARM 17.8.823 Source Information ARM 17.8.824 Additional Impact Analysis ARM 17.8.827 Source Obligation ARM 17.8.828 Innovative Control Technology	These regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit
ARM 17.8.806 Restriction on Area Classifications ARM 17.8.808 Redesignation ARM 17.8.825 Sources Impacting Federal Class 1 Areas -- Additional Requirements ARM 17.8.826 Public Participation	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to

Applicable Requirement	Reason
	impose specific requirements on a major source.
Sub-Chapter 9 – Permit Requirements for Major Stationary Sources or Major Modifications Located Within Nonattainment Areas	
ARM 17.8.901 Definitions ARM 17.8.902 Incorporation by Reference	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.904 When Air Quality Preconstruction Permit Required ARM 17.8.905 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.906 Baseline for Determining Credit for Emissions and Air Quality Offsets	These regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit.
Sub-Chapter 10 - Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Located Within Attainment or Unclassified Areas	
ARM 17.8.1001 Definitions ARM 17.8.1002 Incorporation by Reference	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1004 When Air Quality Preconstruction Permit Required ARM 17.8.1005 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.1006 Review of Specified Sources for Air Quality Impact ARM 17.8.1007 Baseline for Determining Credit for Emissions and Air Quality Offsets	These regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit.
Sub-Chapter 11 – Visibility Impact Assessment	
ARM 17.8.1101 Definitions ARM 17.8.1103 Applicability –Visibility Requirements	These rules consist of regulatory definitions and a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1106 Visibility Impact Analysis ARM 17.8.1107 Visibility Models ARM 17.8.1110 Visibility Monitoring ARM 17.8.1111 Additional Impact Analysis	These regulations may not be applicable to the source at this time. However, these regulations may become applicable during the life of the permit.
ARM 17.8.1108 Notification of Permit Application ARM 17.8.1109 Adverse Impact and Federal Land Management	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
Sub-Chapter 12 – Operating Permit Program	

Applicable Requirement	Reason
ARM 17.8.1201 Definitions ARM 17.8.1202 Incorporation by Reference ARM 17.8.1203 Air Quality Operating Permit Program Overview ARM 17.8.1204 Air Quality Operations Permit Program Applicability ARM 17.8.1210 General Requirements for Content	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1211 Emission Limitation Requirements ARM 17.8.1212 Monitoring, Recordkeeping, and Reporting Requirements ARM 17.8.1213 Compliance Requirements ARM 17.8.1214 Permit Shield & Emergency Requirements ARM 17.8.1215 Operational Flexibility Requirements ARM 17.8.1220 Permit Issuance, Renewal, Reopening, and Modifications ARM 17.8.1221 Operation without Permit and Application Shield ARM 17.8.1222 General Air Quality Operating Permits ARM 17.8.1223 Temporary Air Quality Operating Permits ARM 17.8.1224 Operational Flexibility ARM 17.8.1225 Requirements for Amendments ARM 17.8.1226 Requirements for Additional Permit Modifications ARM 17.8.1227 Requirements for Significant Modifications ARM 17.8.1228 Requirements for Permit Revocation, Reopening, and Revision ARM 17.8.1231 Notice of Termination, Modification, or Revocation and Reissuance for Cause ARM 17.8.1232 Public Participation ARM 17.8.1233 Permit Review by Administrator and Affected States ARM 17.8.1234 Acid Rain – Permits Regulation	Roseburg is currently being permitted in accordance with Subchapter 12 of the Administrative Rules of Montana. Most of these requirements currently apply to the Roseburg facility. Those rules in Subchapter 12 that do not currently apply may become applicable during the life of the permit.
ARM 17.80 Tax Certification for Pollution Control	
ARM 17.80.101 Definitions ARM 17.80.102 Application for Certification as Air or Water Pollution Equipment ARM 17.80.103 Eligibility Criteria ARM 17.80.104 Apportionment Procedures ARM 17.80.105 Compliance ARM 17.80.106 Informal Conference	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
Federal Requirements	
40 CFR 50 National Primary and Secondary Ambient Air Quality Standards 40 CFR 51 Requirements for Preparation, Adoption, and Submittal of Implementation Plans 40 CFR 58 Ambient Air Quality Surveillance	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
	These rules contain requirements for

Applicable Requirement	Reason
40 CFR 52 Approval and Promulgation of Implementation Plans 40 CFR 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	regulatory authorities and not major sources, these rules can be used to impose specific requirements on a major source.

V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

Roseburg is subject to future MACT standards. The MACTs that will be applicable to this facility include 40 CFR 63, Subpart QQQQ, NESHAPs for Wood Building Products Surface Coating operations; Subpart DDDD, NESHAPs for Plywood and Composite Wood Products Manufacturing; and Subpart DDDDD, NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters.

B. NESHAP Standards

As of the date of permit issuance, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

C. NSPS Standards

As of the date of permit issuance, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility.

D. Risk Management Plan

This facility does not have any substance listed in 40 CFR 68.115 or 40 CFR 68.130 that exceeds the minimum threshold quantities.