March 19, 2019

Dennis Tally
Roseburg Forest Products – Missoula Particleboard
P.O. Box 4007
Missoula, MT 59806

RE: Draft Title V Operating Permit #OP2303-10

Dear Mr. Tally:

The Department of Environmental Quality has prepared the enclosed Draft Operating Permit #OP2303-10, for Roseburg Forest Products, located in Missoula, Montana. Please review the cover page of the attached permit for information pertaining to the action taking place on Permit #OP2303-10.

If you have any questions, please contact Craig Henrikson, the permit writer, at (406) 444-6711 or by email at chenrikson@mt.gov.

Sincerely,

Julie A. Merkel
Air Permitting Services Section Supervisor
Air Quality Bureau
(406) 444-3626

Craig Henrikson, P.E.
Environmental Engineer
Air Quality Bureau
(406) 444-6711

JM:CH
Enclosure

cc: Gail Fallon, US EPA Region VIII 8P-AR
Ellen Porter, Ellenp@rfpco.com
Mark Avery, markav@rfpco.com

STATE OF MONTANA
Department of Environmental Quality
Helena, Montana 59620

AIR QUALITY OPERATING PERMIT: OP2303-10

Application Received: **April 11, 2018**
Application Deemed Administratively Complete: **April 11, 2018**
Application Deemed Technically Complete: **April 11, 2018**
AFS Number: 030-063-0002A

Draft Issue Date: **March 19, 2019**
Proposed Issue Date:
End of EPA 45-day Review:
Date of Decision:
Effective Date:
Expiration Date:

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

Roseburg Forest Products
Missoula Particleboard
3300 Raser Drive
Missoula, MT 59802

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, 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 that are only state enforceable are identified in the permit. A copy of this permit must be kept on site at the above-named facility.

Permit Issuance and Appeal Process: In accordance with ARM 17.8.1232, the Department of Environmental Quality (Department) is providing a public comment period from March 19, 2019, to April 18, 2019, to accept comments on this draft permit. Any member of the public, including representatives of the facility, desiring to comment on this draft permit must submit all comments to the Department by April 18, 2019, to be considered. Comments may address the Department analysis and determination or information submitted by the applicant. A public hearing regarding issuance of this permit may be requested by submitting a written request to the Department within the public comment period. The Department intends to issue the proposed operating permit after the comment period has expired and after any required public hearing. The proposed permit will be sent to the United States Environmental Protection Agency (EPA). The EPA is allowed a 45-day review period on the proposed permit. After the EPA comment period has expired, the Department intends to issue a decision on the permit. In accordance with Section 75-2-218, MCA, the Department decision regarding issuance of an operating permit is not effective until 30 days have elapsed from the date of the decision. The decision may be appealed to the Board of Environmental Review (Board) by filing a request for a hearing within 30 days after the date of decision. For more information, please contact the Department at (406) 444-3490.

SECTION I. GENERAL INFORMATION 1
SECTION II. SUMMARY OF EMISSION UNITS 2
SECTION III. PERMIT CONDITIONS 3
A. FACILITY-WIDE 3
B. EU001: PLANT-WIDE 7
C. EU002 – EU005: FINAL DRYERS (DRY100 – DRY103) 14
D. EU008 PREDRYER (DRY 500) AND EU056 REGENERATIVE THERMAL OXIDIZER (RTO) 17
E. EU010: OUTSIDE TRUCK DUMP (BH 50) 21
F. EU057: GREEN MATERIAL TRANSFERS) (BH52) 23
EU058: FURNISH BUILDING (BH56) 23
EU059: PRESCREEN (BH62) 23
EU060: WET BINS (BH64) 23
EU061: M&D FACE (BH70) 23
EU062: M&D CORE (BH72) 23
G. EU012: REJECT SYSTEM (BH 100) 26
H. EU014: BOARD TRIMSAWS (BH 102 A & B) 28
I. EU021: FORMING LINE CLEANUP BH (BH101A & B) 31
J. EU023: FORMING LINE CLEANUP RELAY (BH 201R) 33
K. EU024: EIGHT HEAD SANDER (BH 302 A & B) 36
L. EU026: EIGHT HEAD SANDER RELAY (BH 302R) 38
M. EU028: SCHILLING & BULLNOSE SAW & EDGE BANDER LINE (BH 401) 40
N. EU055: MELAMINE BAGHOUSE (BH500) DUST, MELAMINE TRIM AND PANEL SAW 43
O. EU030: PARTICLE BOARD PRESS AND PRESS VENTS A, B, C, D 45
EU032: SANDER DUST BOILER #1 (BOILER 1) AND BAGHOUSE 76 49
P. EU033: ROEMMC BURNER (ROEMMC) 53
Q. EU047: SOLAGEN BURNER (SOLAGEN) 57
R. EU036: OUTSIDE TRUCK DUMP (FUG 50) 60
EU037: PILE RECLAIM (FUG 51) 60
EU038: RADIAL STACKER (FUG 52) 60
S. EU048: BOARD COOLER VENTS 1, 2, AND 3 (BH74A AND BH74B) 62
T. DRY200 65
U. EMERGENCY GENERATOR 68
SECTION IV. NON-APPLICABLE REQUIREMENTS 70
A. FACILITY-WIDE 70
B. EMISSION UNITS 70
SECTION V. GENERAL PERMIT CONDITIONS 71
A. COMPLIANCE REQUIREMENTS 71
B. CERTIFICATION REQUIREMENTS 71
C. PERMIT SHIELD 72
D. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS 73
E. PROMPT DEVIATION REPORTING 74
F. EMERGENCY PROVISIONS 75
G. INSPECTION AND ENTRY 75
H. FEE PAYMENT 76
I. MINOR PERMIT MODIFICATIONS 76
J. CHANGES NOT REQUIRING PERMIT REVISION 76
K. SIGNIFICANT PERMIT MODIFICATIONS 78
L. REOPENING FOR CAUSE 78
M. PERMIT EXPIRATION AND RENEWAL 79
N. SEVERABILITY CLAUSE 79

O. TRANSFER OR ASSIGNMENT OF OWNERSHIP 79
P. EMISSIONS TRADING, MARKETABLE PERMITS, ECONOMIC INCENTIVES 80
Q. NO PROPERTY RIGHTS CONVEYED 80
R. TESTING REQUIREMENTS 80
S. SOURCE TESTING PROTOCOL 80
T. MALFUNCTIONS 80
U. CIRCUMVENTION 80
V. MOTOR VEHICLES 80
W. ANNUAL EMISSIONS INVENTORY 80
X. OPEN BURNING 81
Y. MONTANA AIR QUALITY PERMITS 81
Z. NATIONAL EMISSION STANDARD FOR ASBESTOS 82
AA. ASBESTOS 82
BB. STRATOSPHERIC OZONE PROTECTION – SERVICING OF MOTOR VEHICLE AIR CONDITIONERS 82
CC. STRATOSPHERIC OZONE PROTECTION – RECYCLING AND EMISSION REDUCTIONS 82
DD. EMERGENCY EPISODE PLAN 82
EE. DEFINITIONS 82

APPENDIX A INSIGNIFICANT EMISSION UNITS A-1
APPENDIX B DEFINITIONS AND ABBREVIATIONS B-1
APPENDIX C NOTIFICATION ADDRESSES C-1
APPENDIX D AIR QUALITY INSPECTOR INFORMATION D-1
APPENDIX E COMPLIANCE ASSURANCE MONITORING (CAM) E-1
APPENDIX F ROUTINE CONTROL DEVICE MAINTENANCE EXEMPTION ... F-1

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

The following general information is provided pursuant to ARM 17.8.1210(1).

Company Name: Roseburg Forest Products

Mailing Address: P.O. Box 4007

City: Missoula State: MT Zip: 59806

Plant Name: Roseburg Missoula Particleboard

Plant Location: The facility is located at 3300 Raser Road, in Missoula, Montana. The legal description of the facility is Section 8, Township 13 North, Range 19 West, Missoula County, Montana.

Responsible Official: Dennis Tally

Alt. Responsible Official: Mark Avery

Facility Contact Person: Ellen Porter

Primary SIC Code: 2493

Nature of Business: Particleboard Manufacturing

Description of Process: The facility 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 planning process in sawmills, is transported to the facility by truck. The material is unloaded at the plant and moved by conveyor to the dryers and the press line, or out to the storage pile. 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. The reman section includes an edge banding line that utilizes an adhesive product to bind tape to the edge of the particleboard. In addition, this facility applies melamine to its manufactured particleboard. Melamine application involves placing a sheet of melamine paper on the top and bottom surfaces of a particleboard mat and pressing the paper and particleboard in a hot press. The melamine paper that overhangs the particleboard is then trimmed with a saw.

SECTION II. SUMMARY OF EMISSION UNITS

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

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	Plant-Wide	N/A
EU002	Final Dryer (DRY 100)	Multiclone
EU003	Final Dryer (DRY 101)	Multiclone
EU004	Final Dryer (DRY 102)	Multiclone
EU005	Final Dryer (DRY 103)	Multiclone
EU006	Final Dryer (DRY 200)	Multiclone
EU008	Predryer (DRY 500)	WESP and RTO
EU010	Outside Truck Dump (BH 50)	Baghouse
EU013	Reject System Relay (BH 100)	Baghouse
EU014	Board Trim Saws (BH 102 A & B)	Two Baghouses
EU021	Forming Line Cleanup (BH 101 A&B)	Two Baghouses
EU024	Eight Head Sander System (BH 302 A & B)	Two Baghouses
EU026	Eight Head Sander Relay (BH 302R)	Baghouse
EU028	Schilling & Bullnose Saw and Edge Bander Line (BH 401)	Baghouse
EU030	Press Vents 1, 2, 3, & 4 (PRESS 100)	Biofilter
EU032	Boiler #1 (BOILER #1)	Multiclone and Baghouse (BH76)
EU033	Roemmc Burner (ROEMMC)	Multiclone
EU036	Outside Truck Dump (FUG 50)	Cover
EU037	Pile Reclaim (FUG 51)	None
EU038	Radial Stacker (FUG 52)	Reduced drop height and berm
EU047	Solagen Burner (SOLAGEN)	Medium Efficiency Cyclone and WESP
EU048	Board Cooler Vents 1, 2, & 3	Baghouse (BH74A & BH74B)
EU055	Melamine Baghouse (BH 500)	Baghouse
EU056	Regenerative Thermal Oxidizer (RTO)	None (It is the control device for EU008))
EU057	Green Material Transfers (BH 52)	Baghouse
EU058	Furnish Building (BH 56)	Baghouse
EU059	Prescreen Process (BH 62)	Baghouse
EU060	Wet Bins (BH 64)	Baghouse
EU061	M&D Face (BH 70)	Baghouse
EU062	M&D Core (BH 72)	Baghouse

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

Conditions	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.105	Testing Requirements	Testing Requirements	-------
A.2	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.3	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.4	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.5	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precautions	-------
A.6	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution, Construction	20%
A.7	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.8	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E= 4.10 * P^{0.67}$ or $E= 55 * P^{0.11} - 40$
A.9	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.10	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.11	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-------
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000 Gallon Capacity	-------
A.13	ARM 17.8.342	NESHAPs General Provisions	SSM Plans	Submittal
A.14	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.15	ARM 17.8.749	Conditions for Issuance of Permit	Recordkeeping	-----
A.16	ARM 17.8.1211(1)(c) and 40 CFR Part 98	Greenhouse Gas Reporting	Reporting	-------
A.17	ARM 17.8.1212	Reporting Requirements	Prompt Deviation Reporting	-------
A.18	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-------
A.19	ARM 17.8.1207	Reporting Requirements	Annual Certification	-------

Conditions

A.1. Pursuant to ARM 17.8.105, any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

Compliance demonstration frequencies that list "as required by the Department" refer to ARM 17.8.105. In addition, for such sources, compliance with limits and conditions listing "as required by the Department" as the frequency, is verified annually using emission factors and engineering calculations by the Department's compliance inspectors during the annual emission inventory review; in the case of Method 9 tests, compliance is monitored during the regular inspection by the compliance inspector.

A.2. 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.3. 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.4. 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.5. 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.6. 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.7. 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 million BTU (MMBtu) per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu.

A.8. Pursuant to ARM 17.8.310, unless otherwise specified by rule or in this permit, 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 = rate of emissions in pounds per hour and p = process weight rate in tons per hour.

A.9. Pursuant to ARM 17.8.322(4), Roseburg shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million BTU fired, unless otherwise specified by rule or in this permit.

A.10. 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.11. 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 specified by rule or in this permit.

A.12. 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.13. Pursuant to ARM 17.8.302 and ARM 17.8.342, and 40 CFR 63.6, the Roseburg must maintain at the affected source a current startup, shutdown, and malfunction plan (if a plan is required by 40 CFR 63.6(e)(3) and the Table for General Provision Applicability of the appropriate subpart), meeting the requirements of 40 CFR 63.6, and must make the plan available upon request. In addition, if the startup, shutdown, and malfunction plan is subsequently revised, the owner or operator must maintain at the affected source each previous (i.e., superseded) version of the startup, shutdown, and malfunction plan, and must make each such previous version available for a period of 5 years after revision of the plan. The owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in 40 CFR 63.10(d)(5).

A.14. 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.15. 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 (ARM 17.8.1212).

A.16. Pursuant to ARM 17.8.1211(1)(c) and 40 CFR Part 98, Roseburg shall comply with requirements of 40 CFR Part 98 - Mandatory Greenhouse Gas Reporting, as applicable (ARM 17.8.1211(1)(c), NOT an applicable requirement under Title V).

A.17. Roseburg shall promptly report deviations from permit requirements including those attributable to upset conditions, as upset is defined in the permit. To be considered prompt, deviations shall be reported to the Department using the schedule and content as described in Section V.E (unless otherwise specified in an applicable requirement) (ARM 17.8.1212).

A.18. On or before February 15 and August 15 of each year, Roseburg 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 February 15 of each year, Roseburg 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.19. By February 15 of each year, Roseburg shall submit to the Department the compliance certification required by Section V.B. The annual certification required by Section V.B must include a statement of compliance based on the information available which 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."***

B. EU001: Plant-Wide

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.1, B.15, B.28, B.29, B.35, B.36, B.37	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	Semiannual
B.2, B.16, B.30, B.36, B.37	Press, board coolers, and final dryers/Hours of Operation	8,500 Hours During any Rolling 12-Month Period	Recordkeeping	Ongoing	Semiannual
B.3, B.17, B.30, B.36, B.37	Sander Dust Handling Systems	Enclosed and Equipped with a Baghouse	Recordkeeping	Monthly	Semiannual
B.4, B.18, B.30, B.36, B.37	Contaminated Floor Sweepings	Not Stored Outside; Material stored in contaminated floor sweepings building limited to 50 units (370 cubic yards)	Recordkeeping	Monthly	Semiannual
B.5, B.19, B.30, B.36, B.37	Fugitive Emissions	Maintain Vegetation on Earthen Berm	Recordkeeping	Monthly	Semiannual
B.6, B.20, B.30, B.36, B.37	Total Particulate Emissions from the Raw Materials Storage Pile	455 lb/day and 14.7 ton/yr	Calculate Using Equation	Daily and Semiannual	Semiannual
B.7, B.20, B.30, B.36, B.37	PM_{10} Emissions from the Raw Materials Storage Pile	178 lb/day and 5.2 ton/yr	Calculate Using Equation	Daily and Semiannual	Semiannual
B.8, B.21, B.30, B.36, B.37	Raw Material Received and Operation of Truck Dump(s)	Keep Daily Records of Total Bone-Dry Tons of Raw Material Received and Records of Any Days When Either Truck Dump is Not Operating	Recordkeeping	Daily	Semiannual
B.9, B.22, B.30, B.36, B.37	Collection Efficiency of the Truck Dump Baghouse	Maintain a Cover Over the Lift Portion of the Outside Truck Dump	Recordkeeping	Monthly	Semiannual
B.10, B.23, B.30, B.36, B.37	Fugitive Dust Emissions	Maintain a Cover Over the Reclaim Hopper	Recordkeeping	Monthly	Semiannual
B.11, B.27, B.31, B.36, B.37	Hazardous Air Pollutants	40 CFR 63, Subparts A and JJ	40 CFR 63, Subparts A and JJ	40 CFR 63, Subparts A and JJ	Semiannual
B.12, B.25, B.32, B.36, B.37	Hazardous Air Pollutants	40 CFR 63, Subparts A and DDDD	40 CFR 63, Subparts A and DDDD	40 CFR 63, Subparts A and DDDD	Semiannual
B.13, B.26, B.33, B.36, B.37	Hazardous Air Pollutants	40 CFR 63, Subparts A and DDDDD	40 CFR 63, Subparts A and DDDDD	40 CFR 63, Subparts A and DDDDD	Semiannual

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
B.14, B.27, B.34, B.36, B.37	Hazardous Air Pollutants	40 CFR 63, Subparts A and ZZZZ	40 CFR 63, Subparts A and ZZZZ	40 CFR 63, Subparts A and ZZZZ	Semiannual

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(2)).

B.2. The final dryers, press and board coolers shall each be limited to a total of 8,500 hours of operation during any rolling 12-month period (ARM 17.8.749).

B.3. 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.4. 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 (yd^3)) (ARM 17.8.749).

B.5. Roseburg shall 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.6. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 455-pounds per day (lb/day) daily maximum and 14.7 tons per year (TPY) for total particulate emissions (PM) (ARM 17.8.749).

B.7. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 178-lb/day daily maximum and 5.2 TPY for particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) (ARM 17.8.749).

B.8. Roseburg shall keep daily records of the total bone-dry tons (BDT) 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 (ARM 17.8.749).

B.9. Roseburg shall 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.10. Roseburg shall maintain a cover over the reclaim hopper to reduce fugitive dust emissions (ARM 17.8.749).

B.11. Roseburg shall comply with all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements of 40 CFR 63, Subpart A, General Provisions,

and Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (ARM 17.8.342 and 40 CFR 63, Subparts A and JJ).

B.12. Roseburg shall comply with all applicable standards and limitations, and the reporting, recordkeeping, monitoring, and notification requirements of 40 CFR 63, Subpart A, General Provisions, and Subpart DDDD, National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subparts A and DDDD).

B.13. Roseburg shall comply with all applicable standards and limitations, and the reporting, recordkeeping, monitoring, and notification requirements of 40 CFR 63, Subpart A, General Provisions, and Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants: Boiler and Process Heater (ARM 17.8.342 and 40 CFR 63, Subparts A and DDDDD).

B.14. Roseburg shall comply with all applicable standards and limitations, and the reporting, recordkeeping, monitoring, and notification requirements of 40 CFR 63, Subpart A, General Provisions, and Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engine (ARM 17.8.342 and 40 CFR 63, Subparts A and ZZZZ).

Compliance Demonstration

B.15. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on affected units. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the affected source for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the affected source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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.16. Roseburg shall document, by month, the hours of operation of Line 1. By the 25th day of each month, Roseburg shall total the hours of operation of Line 1 during the previous month. The monthly information will be used to verify compliance with the rolling 12-

month limitation contained in Section III.B.2. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

B.17. Roseburg shall monitor compliance with Section III.B.3 by documenting any instance in which any of the sander dust-handling systems were not enclosed or equipped with a baghouse and any instance in which sander dust was stored outside. Records must include the date and circumstance (ARM 17.8.1213).

B.18. Roseburg shall monitor compliance with Section III.B.4 by documenting, monthly, any instance in which contaminated floor sweepings were stored outside and any instance in which the amount of material stored in the contaminated floor sweepings building exceeded 370 cubic yards (yd^3) at any one time (ARM 17.8.1213).

B.19. Roseburg shall monitor compliance with Section III.B.5 by documenting, monthly, that vegetation is maintained along the earthen berm to reduce fugitive dust. The records shall include all maintenance activities performed, including the date of any actions taken. Furthermore, Roseburg shall document, monthly, all dust control measures that have been applied to the storage pile, including the date of application (ARM 17.8.1213).

B.20. Roseburg shall monitor compliance with Sections III.B.6 and III.B.7 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 in pounds (lb);
I = Total raw material delivered to plant in BDT;
e = PM_{10} emission factor of 0.36 pound per ton (lb/ton), or a PM emission factor of 1.0 lb/ton, $PM_{2.5}$ emission factor of 0.15 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; and
n_{rp} = Control efficiency at the pile reclaim expressed as a ratio.

Notes:

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

Description	Control Efficiency	Controls
Outdoor truck dump	99%	Covered surge bin and trailer lift with baghouse system
Pile reclaim	90%	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; and

iii. Add (i) and (ii) above.

B.21. Roseburg shall monitor compliance with Section III.B.8 through recordkeeping as described in Section III.B.8 (ARM 17.8.1213).

B.22. Roseburg shall monitor compliance with Section III.B.9 by documenting, monthly, that the cover over the lift portion of the outside truck dump has been maintained to increase the collection efficiency of the truck dump baghouse. The records shall contain all maintenance activities conducted on the cover over the lift portion of the outside truck dump. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

B.23. Roseburg shall monitor compliance with Section III.B.10 by documenting, monthly, that the cover over the reclaim hopper has been maintained to reduce the fugitive dust emissions. The records shall contain all maintenance activities conducted on the cover over the reclaim hopper. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

B.24. Roseburg shall monitor compliance with Section III.B.11 as required by 40 CFR 63, Subpart A, General Provisions, and Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (ARM 17.8.342 and 40 CFR 63, Subparts A and JJ).

B.25. Roseburg shall monitor compliance with Section III.B.12 as required by 40 CFR 63, Subpart A, General Provisions, and Subpart DDDD, National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subparts A and DDDD).

B.26. Roseburg shall monitor compliance with Section III.B.13 as required by 40 CFR 63, Subpart A, General Provisions, and Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants: Boiler and Process Heater (ARM 17.8.342 and 40 CFR 63, Subparts A and DDDDD).

B.27. Roseburg shall monitor compliance with Section III.B.14 as required by 40 CFR 63, Subpart A, General Provisions, and Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engine (ARM 17.8.342 and 40 CFR 63, Subparts A and ZZZZ).

Recordkeeping

B.28. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.B.15. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

B.29. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

B.30. Roseburg shall maintain the records required by Section III.B.2, III.B.8 and III.B.16–III.B.23 on site and submit the information to the Department upon request (ARM 17.8.1212).

B.31. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63, Subpart A, General Provisions, and Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (ARM 17.8.342 and 40 CFR 63, Subparts A and JJ).

B.32. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63, Subpart A, General Provisions, and Subpart DDDD, National Emissions Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR Part 63, Subparts A and DDDD).

B.33. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63, Subpart A, General Provisions, and Subpart DDDDD, National Emissions Standards for Hazardous Air Pollutants: Boiler and Process Heater (ARM 17.8.342 and 40 CFR 63, Subparts A and DDDDD).

B.34. Roseburg shall comply with all recordkeeping requirements as required by 40 CFR 63, Subpart A, General Provisions, and Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engine (ARM 17.8.342 and 40 CFR 63, Subparts A and ZZZZ).

Reporting

B.35. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

B.36. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B.37. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log;

c. A summary of the recordkeeping requirements of Section III.B.30;

d. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified;

e. Certification of compliance with 40 CFR 63, Subparts A and JJ;

f. Certification of compliance with 40 CFR 63, Subparts A and DDDD;

g. Certification of compliance with 40 CFR 63, Subparts A and DDDDD; and

h. Certification of compliance with 40 CFR 63, Subparts A and ZZZZ.

C. EU002 – EU005: Final Dryers (DRY100 – DRY103)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
C.1, C.7, C.12, C.16, C.17, C.18,	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	Semiannual
C.2, C.8, C.13, C.16, C.17, C.18,	Total Particulate Matter/Combined Dryer Stack (DRY100, DRY101, DRY102, and DRY103)	20.5 lb/hr Total PM	Method 5	Initial testing within 180 days and then every 5 years	Semiannual
C.3, C.9, C.13, C.16, C.17, C.18	Total PM_{10} /Combined Dryer stack (DRY100, DRY101, DRY102, and DRY103)	20.5 lb/hr of PM_{10}	Method 201A	Initial testing within 180 days and then every 5 years	Semiannual
C.4, C.10, C.14, C.15, C.17, C.18	Furnish Inlet Moisture Content	24-hour block average of less than or equal to 30% (by weight, dry basis)	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
C.5, C.10, C.14, C.15, C.17, C.18	Inlet Dryer Temperature	24-hour block average of less than or equal to 600 °F	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
C.6, C.11, C.15, C.18	Particulate Emissions	Operate and Maintain Multiclones	Recordkeeping	Monthly	Semiannual

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. Total particulate matter (PM) emissions from the Final Dryer Stack (includes DRY100 - DRY103) shall not exceed 20.5 pounds per hour (lb/hr) (ARM 17.8.749).

C.3. Emissions of total PM_{10} from Final Dryer Stack shall not exceed 20.5 lb/hr (ARM 17.8.749).

C.4. Roseburg must process furnish with a 24-hour block average inlet moisture content of less than or equal to 30% (by weight, dry basis) (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

C.5. Roseburg shall install and operate temperature sensors at the inlet of the dry rotary dryers (Final Dryers). 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 the combustion units. The alarm system shall become activated when the 24-hour block average inlet dryer temperature exceeds 600 °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 and 40 CFR 63, Subpart DDDD). (ARM 17.8.749).

C.6. Each dryer shall be equipped with multiclone control that is operated and maintained to meet the appropriate emission limits as specified in Sections III.C.1, III.C.2, and III.C.3 (ARM 17.8.752).

Compliance Demonstration

C.7. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the stack for DRY100 – DRY103 . Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the affected source for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the affected source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

C.8. Roseburg shall demonstrate compliance with Sections III.C.2 by conducting EPA Method 5 source testing on the combined stack for DRY100 – DRY103 to determine the total particulate matter emissions from the stack. The test results shall be used to monitor compliance with the total particulate matter mass emission limits of the operating sources vented to the stack at the time of the compliance source test. Following the completion of the line 1 modernization project, testing shall occur on the Final Dryers (DRY 100 – 103), within 180 days of initial startup, and then testing and compliance demonstration shall take place at least once every 5 years for each unit or on another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105 and ARM 17.8.1213).

C.9. Roseburg shall demonstrate compliance with Sections III.C.3 by conducting EPA Method 201A source testing on the combined stack emissions, for DRY100 – DRY103, to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The test results shall be used to monitor compliance with the total PM_{10} mass emission limits of the operating sources vented to the stack at the time of the compliance source test. Following the completion of the line 1 modernization project, testing shall occur on the Final Dryers (DRY 100 – 103), within 180 days of initial startup, and then testing and compliance demonstration shall take place at least once every 5 years for each unit or on another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105 and ARM 17.8.1213).

C.10. Roseburg shall monitor compliance with Section III.C.4 and III.C.5 as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

C.11. Roseburg shall monitor compliance with Section III.C.6 by documenting monthly, that the multiclones are operated and maintained on each dryer to meet the emission limits as specified in Section III.C.2 and III.C.3. The records shall include all repair and maintenance activity to the multiclones. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

Recordkeeping

C.12. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.C.7. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

C.13. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

C.14. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

C.15. Roseburg shall maintain the records required by Sections III.C.10 and III.C.11 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

C.16. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

C.17. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

C.18. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log;

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified; and

d. Certification of compliance with 40 CFR 63, Subpart DDDD.

D. EU008 Predryer (DRY 500) and EU056 Regenerative Thermal Oxidizer (RTO)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration	Method Frequency	Reporting Requirements
D.1, D.12, D.15, D.21, D.27, D.28, D.29	Predryer -Total Particulate Matter	6.21 lb/hr	Method 5	Every 5 years	Semiannual
D.2, D.13, D.15, D.21, D.27, D.28, D.29	Predryer –Total PM_{10}	6.21 lb/hr	Method 201A	Every 5 years	Semiannual
D.3, D.16, D.28, D.29	Particulate Emissions	Operate and Maintain WESP	Recordkeeping	Monthly	Semiannual
D.4, D.14, D.22, D.28, D.29	Production	200,000 BDT per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
D.5, D.16, D.24, D.28, D.29	RTO	Operate and Maintain	Recordkeeping	Monthly	Semiannual
D.6, D.11, D.20, D.21, D.24, D.27, D.28, D.29	RTO/Opacity	10%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
D.7, D.12, D.17, D.21, D.27, D.28, D.29	Particulate Matter/RTO	0.10 gr/dscf	Method 5	Every 5 years	Semiannual
D.8, D.18, D.25, D.28, D.29	Opacity Monitor	Install and Operate (if required)	Recordkeeping (if required to install)	Monthly	Semiannual
D.9, D.19, D.26, D.28, D.29	RTO Routine Control Device Maintenance Exemption	Maximum of 3% of the green dryer annual operating uptime	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
D.10, D.15, D.23, D.26, D.28, D.29	PM_{10} CAM Plan (Predryer)	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	Semiannual

Conditions

D.1. Emissions of total particulate matter from the predryer shall be limited to a maximum of 6.21 lb/hr (ARM 17.8.749).

D.2. Emissions of PM_{10} from the predryer shall be limited to a maximum of 6.21 lb/hr (ARM 17.8.749).

D.3. The predryer shall be equipped with a wet electrostatic precipitator (WESP) that is operated and maintained to meet the emission limits specified in III.D.1, and III.D.2 (ARM 17.8.752).

D.4. Production from the predryer shall not exceed 200,000 BDT per any rolling 12-month time period (ARM 17.8.749).

D.5. Roseburg shall operate and maintain an RTO to control volatile hazardous air pollutants (VHAP) emissions from the predryer (ARM 17.8.749).

D.6. Roseburg shall not cause or authorize to be discharged into the atmosphere from the RTO any visible emissions that exhibit an opacity of 10% or greater averaged over 6 consecutive minutes (ARM 17.8.752).

D.7. Roseburg shall not cause or authorize to be discharged into the atmosphere from the RTO any particulate matter emissions in excess of 0.10 gr/dscf (ARM 17.8.752).

D.8. The Department reserves the right to require opacity monitors at the RTO 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 this location, further opacity monitoring may be required (ARM 17.8.749).

D.9. Roseburg's Routine Control Device Maintenance Exemption, as specified in Appendix F, shall not exceed 3 percent of the predryer's annual operating uptime (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

D.10. Roseburg shall provide a reasonable assurance of compliance with the emission limitations or standards for the operation of the emitting unit by following the Compliance Assurance Monitoring (CAM) plan contained in Appendix E of this permit (ARM 17.8.1504).

Compliance Demonstration

D.11. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the RTO stack. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the RTO for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 5% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the RTO for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

D.12. Roseburg shall monitor compliance with Section III.D.1 and III.D.7 by conducting EPA Method 5 source testing to determine the total particulate matter emissions from the RTO stack. The testing and compliance monitoring of emissions from the stack shall take place at least once every 5 years, 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. The Department may require additional testing (ARM 17.8.1213).

D.13. Roseburg shall monitor compliance with Section III.D.2 by conducting EPA Method 201A source testing to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from each stack shall take place at least once every 5 years, 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. The Department may require additional testing (ARM 17.8.1213).

D.14. Roseburg shall document, by month, the production of the predryer. By the 25th day of each month, Roseburg shall total the production of the predryer during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.D.4. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

D.15. Roseburg shall monitor compliance with Section III.D.1 and III.D.2 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

D.16. Roseburg shall operate and maintain an RTO to control VHAP emissions from the predryer (ARM 17.8.749).

D.17. Roseburg shall monitor compliance with Section III.D.7 by conducting EPA Method 5 source testing on the RTO to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place every five years 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. The Department may require additional testing (ARM 17.8.1213).

D.18. The Department reserves the right to require opacity monitors at the RTO 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 this location, further opacity monitoring may be required (ARM 17.8.749).

D.19. Roseburg's Routine Control Device Maintenance Exemption, as specified in Appendix F, shall not exceed 3 percent of the green dryer annual operating uptime (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

Recordkeeping

D.20. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.D.11. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

D.21. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

D.22. Roseburg shall maintain the records required by Section III.D.14 on-site and submit the information to the Department upon request (ARM 17.8.1212).

D.23. Roseburg shall maintain CAM applicable records in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR 64).

D.24. Roseburg shall monitor compliance with Section III.D.5 by documenting, monthly, that the RTO has been installed, operated, and maintained. The records shall include all repair and maintenance activity to the RTO. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

D.25. If opacity monitors are required by the Department at the RTO stack, Roseburg shall document, monthly, that the opacity monitors were installed and operating to monitor compliance with Section III.D.9 (ARM 17.8.1213).

D.26. Roseburg shall maintain all applicable recordkeeping requirements as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

Reporting

D.27. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

D.28. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

D.29. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified.

d. Provide a summary of the documentation if required in Sections III.D.22-III.D.25.

e. Certification of compliance with 40 CFR 63, Subpart DDDD.

E. EU010: Outside Truck Dump (BH 50)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
E.1, E.5, E.9, E.10, E.11, E.12, E.13	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
E.2, E.6, E.10, E.11, E.12, E.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
E.3, E.7, E.10, E.11, E.12, E.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
E.4, E.8, E.10, E.11, E.12, E.13	Flow Rate	27,470 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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 17.8.304(2)).

E.2. Emissions of Total Particulate from the outside truck dump baghouse shall not exceed 0.005 grains per dry standard cubic foot (gr/dscf) of exhaust gas (ARM 17.8.749).

E.3. Emissions of PM_{10} from the outside truck dump baghouse shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

E.4. The flowrate through BH50 shall not exceed 27,470 dry cubic feet per minute (dcfm) (ARM 17.8.749).

Compliance Demonstration

E.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the outside truck dump. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the outside truck dump for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the

visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the outside truck dump for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

E.6. Roseburg shall monitor compliance with Section III.E.2 by conducting EPA Method 5 source testing on the stack emissions of the outside truck dump to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

E.7. Roseburg shall monitor compliance with Section III.E.3 by conducting EPA Method 201A source testing on the stack emissions of the outside truck dump to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

E.8. Roseburg shall monitor compliance with Section III.E.4 by conducting EPA Method 2 Source Testing on the stack of the outside truck dump to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

E.9. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.E.5. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

E.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

E.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

E.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

E.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

F. EU057: Green Material Transfers) (BH52)
EU058: Furnish Building (BH56)
EU059: Prescreen (BH62)
EU060: Wet Bins (BH64)
EU061: M&D Face (BH70)
EU062: M&D Core (BH72)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
F.1, F.6, F.11, F.12, F.14, F.15, F.16	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
F.2, F.7, F.12, F.14, F.15, F.16	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
F.3, F.8, F.12, F.14, F.15, F.16	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
F.4, F.9, F.12, F.14, F.15, F.16	Flow Rate	As noted below for each baghouse	Method 2	As Required by the Department and Section III.A.1	Semiannual
F.5, F.10, F.13, F.15, F.16	Baghouse	Operate and maintain	Recordkeeping	Monthly	Semiannual

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(2)).

F.2. Emissions of Total Particulate from BH 52, 56, 62, 64, 70, and 72 shall not exceed 0.005 gr/dscf of exhaust gas from each baghouse (ARM 17.8.749).

F.3. Emissions of PM_{10} from BH 52, 56, 62, 64, 70, and 72 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

F.4. The flowrate through each baghouse shall not exceed the following flowrates as measured in dscfm (ARM 17.8.749):

BH52 21,000 dscfm
BH56 20,000 dscfm
BH62 25,000 dscfm
BH64 25,000 dscfm
BH70 28,000 dscfm
BH72 28,000 dscfm

F.5. Roseburg shall operate and maintain each baghouse to control emissions from their respective emitting sources (ARM 17.8.749).

Compliance Demonstration

F.6. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions for each baghouse listed in this section. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey each baghouse listed in this section for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Source of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Source shall perform the Method 9 source tests on each baghouse listed in this section for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

F.7. Roseburg shall monitor compliance with Section III.F.2 by conducting EPA Method 5 source testing on the stack emissions of each baghouse to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

F.8. Roseburg shall monitor compliance with Section III.F.3 by conducting EPA Method 201A source testing on the stack emissions of each baghouse to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

F.9. Roseburg shall monitor compliance with Section III.F.4 by conducting EPA Method 2 Source Testing on the stack of each baghouse to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

F.10. Roseburg shall monitor compliance with Section III.F.5 by documenting, monthly, that each baghouse was operated and maintained on their respective emitting units. The records shall include all repair and maintenance activity to each baghouse. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

Recordkeeping

F.11. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.F.6. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

F.12. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

F.13. Roseburg shall maintain the records required by Section III.F.10 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

F.14. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

F.15. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

F.16. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified.

G. EU012: Reject System (BH 100)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
G.1, G.5, G.9, G.10, G.11, G.12, G.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
G.2, G.6, G.10, G.11 G.12, G.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
G.3, G.7, G.10, G.11 G.12, G.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
G.4, G.8, G.10, G.11 G.12, G.13	Flow Rate	40,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

G.2. Emissions of Total Particulate from BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

G.3. Emissions of PM_{10} from BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

G.4. The flowrate through BH100 shall not exceed 40,000 dcfm (ARM 17.8.749).

Compliance Demonstration

G.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH100. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH100 for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH100 for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

G.6. Roseburg shall monitor compliance with Section III.G.2 by conducting EPA Method 5 source testing on the stack emissions of BH100 to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

G.7. Roseburg shall monitor compliance with Section III.G.3 by conducting EPA Method 201A source testing on the stack emissions of BH 100 to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

G.8. Roseburg shall monitor compliance with Section III.G.4 by conducting EPA Method 2 Source Testing on the stack of BH 100 to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

G.9. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.G.5. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

G.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

G.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

G.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

G.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

H. EU014: Board Trimsaws (BH 102 A & B)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
H.1, H.5, H.9, H.10, H.11, H.12, H.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
H.2, H.6, H.10, H.11, H.12, H.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
H.3, H.7, H.10, H.11, H.12, H.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
H.4, H.8, H.10, H.11, H.12, H.13	Flow Rate	28,800 dcfm each	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

H.2. Emissions of Total Particulate from BH102A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

H.3. Emissions of PM_{10} from BH102A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

H.4. The flowrate through BH102 A&B shall each not exceed 28,800 dcfm (ARM 17.8.749).

Compliance Demonstration

H.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 102 A & B. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 102 A & B for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 102 A & B for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

H.6. Roseburg shall monitor compliance with Section III.H.2 by conducting EPA Method 5 source testing on the stack emissions of BH 102 A & B to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The source testing shall occur while Roseburg is using sander dust as the fuel for the Boiler (ARM 17.8.105 and ARM 17.8.749). The Department may require additional testing (ARM 17.8.1213).

H.7. Roseburg shall monitor compliance with Section III.H.3 by conducting EPA Method 201A source testing on the stack emissions of BH 102 A & B to determine the PM_{10} emissions from the stacks. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The source testing shall occur while Roseburg is using sander dust as the fuel for the Boiler (ARM 17.8.105 and ARM 17.8.749). The Department may require additional testing (ARM 17.8.1213).

H.8. Roseburg shall monitor compliance with Section III.H.4 by conducting EPA Method 2 Source Testing on the stacks of BH 102 A & B to determine the flowrate through each baghouse. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

H.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

H.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

H.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

H.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

H.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

I. EU021: Forming Line Cleanup BH (BH101A & B)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
I.1, I.5, I.9, I.10, I.11, I.12, I.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
I.2, I.6, I.10, I.11, I.12, I.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
I.3, I.7, I.10, I.11, I.12, I.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
I.4, I.8, I.10, I.11, I.12, I.13	Flow Rate	26,000 dcfm each	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

I.2. Emissions of Total Particulate from BH 101A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

I.3. Emissions of PM_{10} from BH 101A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

I.4. The flowrate through BH 101A & B shall each not exceed 26,000 dcfm (ARM 17.8.749).

Compliance Demonstration

I.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 101A & B. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 101A & B for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9

source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 101A & B for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

I.6. Roseburg shall monitor compliance with Section III.I.2 by conducting EPA Method 5 source testing on the stack emissions of BH 101 A & B to determine the total particulate matter emissions from the stacks. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

I.7. Roseburg shall monitor compliance with Section III.I.3 by conducting EPA Method 201A source testing on the stack emissions of BH 101 A & B to determine the PM_{10} emissions from the stacks. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

I.8. Roseburg shall monitor compliance with Section III.I.4 by conducting EPA Method 2 Source Testing on the stacks of BH 101 A & B to determine the flowrate through each baghouse. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

I.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

I.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

I.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

I.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

I.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

J. EU023: Forming Line Cleanup Relay (BH 201R)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
J.1, J.5, J.9, J.10, J.11, J.12, J.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
J.2, J.6, J.10, J.11, J.12, J.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
J.3, J.7, J.10, J.11, J.12, J.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
J.4, J.8, J.10, J.11, J.12, J.13	Flow Rate	4,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

J.2. Emissions of Total Particulate from BH 101R shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

J.3. Emissions of PM_{10} from BH 101R shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

J.4. The flowrate through BH 101R shall not exceed 4,000 dcfm (ARM 17.8.749).

Compliance Demonstration

J.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 101R. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 101R for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 101R for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

J.6. Roseburg shall monitor compliance with Section III.J.2 by conducting EPA Method 5 source testing on the stack emissions of BH 101R to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

J.7. Roseburg shall monitor compliance with Section III.J.3 by conducting EPA Method 201A source testing on the stack emissions of BH 101R to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

J.8. Roseburg shall monitor compliance with Section III.J.4 by conducting EPA Method 2 Source Testing on the stack of BH 101R to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

J.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

J.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

J.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

J.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

J.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

K. EU024: Eight Head Sander (BH 302 A & B)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
K.1, K.5, K.9, K.10, K.11, K.12, K.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
K.2, K.6, K.10, K.11, K.12, K.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
K.3, K.7, K.10, K.11, K.12, K.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
K.4, K.8, K.10, K.11, K.12, K.13	Flow Rate	47,000 dcfm each	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

K.2. Emissions of Total Particulate from BH 302 A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

K.3. Emissions of PM_{10} from BH 302 A & B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

K.4. The flowrate through BH 302 A & B shall each not exceed 47,000 dcfm (ARM 17.8.749).

Compliance Demonstration

K.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 302 A & B. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 302 A & B for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the

visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 302 A & B for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

K.6. Roseburg shall monitor compliance with Section III.K.2 by conducting EPA Method 5 source testing on the stack emissions of BH 302 A & B to determine the total particulate matter emissions from the stacks. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

K.7. Roseburg shall monitor compliance with Section III.K.3 by conducting EPA Method 201A source testing on the stack emissions of BH 302 A & B to determine the PM_{10} emissions from the stacks. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

K.8. Roseburg shall monitor compliance with Section III.K.4 by conducting EPA Method 2 Source Testing on the stacks of BH 302 A & B to determine the flowrate through each baghouse. The testing and compliance monitoring of emissions from the stacks shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

K.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

K.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

K.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

K.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

K.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

L. EU026: Eight Head Sander Relay (BH 302R)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
L.1, L.5, L.9, L.10, L.11, L.12, L.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
L.2, L.6, L.10, L.11, L.12, L.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
L.3, L.7, L.10, L.11, L.12, L.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
L.4, L.8, L.10, L.11, L.12, L.13	Flow Rate	10,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

L.2. Emissions of Total Particulate from BH 302R shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

L.3. Emissions of PM_{10} from BH 302R shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

L.4. The flowrate through BH 302R shall not exceed 10,000 dcfm (ARM 17.8.749).

Compliance Demonstration

L.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 302R. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 302R for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 302 R for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

L.6. Roseburg shall monitor compliance with Section III.L.2 by conducting EPA Method 5 source testing on the stack emissions of BH 302R to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

L.7. Roseburg shall monitor compliance with Section III.L.3 by conducting EPA Method 201A source testing on the stack emissions of BH 302R to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

L.8. Roseburg shall monitor compliance with Section III.L.4 by conducting EPA Method 2 Source Testing on the stack of BH 302R to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

L.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

L.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

L.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

L.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

L.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

M. EU028: Schilling & Bullnose Saw & Edge Bander Line (BH 401)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
M.1, M.5, M.9, M.10, M.11, M.12, M.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
M.2, M.6, M.10, M.11 M.12, M.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
M.3, M.7, M.10, M.11, M.12, M.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
M.4, M.8, M.10, M.11, M.12, M.13	Flow Rate	27,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

M.2. Emissions of Total Particulate from BH 401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

M.3. Emissions of PM_{10} from BH 401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

M.4. The flowrate through BH 401 shall not exceed 27,000 dcfm (ARM 17.8.749).

Compliance Demonstration

M.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 401. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 401 for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 401 for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

M.6. Roseburg shall monitor compliance with Section III.M.2 by conducting EPA Method 5 source testing on the stack emissions of BH 401 to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

M.7. Roseburg shall monitor compliance with Section III.M.3 by conducting EPA Method 201A source testing on the stack emissions of BH 401 to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

M.8. Roseburg shall monitor compliance with Section III.M.4 by conducting EPA Method 2 Source Testing on the stack of BH 401 to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

M.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

M.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

M.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

M.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

M.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

N. EU055: Melamine Baghouse (BH500) Dust, Melamine Trim and Panel Saw

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
N.1, N.5, N.9, N.10, N.11, N.12, N.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
Condition(s)	**Pollutant/Parameter**	**Permit Limit**	**Compliance Demonstration Method**	**Compliance Demonstration Frequency**	**Reporting Requirements**
N.2, N.6, N.10, N.11, N.12, N.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
N.3, N.7, N.10, N.11, N.12, N.13	PM_{10}	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
N.4, N.8, N.10, N.11, N.12, N.13	Flow Rate	21,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

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(2)).

N.2. Emissions of Total Particulate from BH500 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

N.3. Emissions of PM_{10} from BH500 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

N.4. The flowrate through BH500 shall not exceed 21,000 dcfm (ARM 17.8.749).

Compliance Demonstration

N.5. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the BH 500. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the BH 500 for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9

source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the BH 500 for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

N.6. Roseburg shall monitor compliance with Section III.N.2 by conducting EPA Method 5 source testing on the stack emissions of BH 500 to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

N.7. Roseburg shall monitor compliance with Section III.N.3 by conducting EPA Method 201A source testing on the stack emissions of BH 500 to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

N.8. Roseburg shall monitor compliance with Section III.N.4 by conducting EPA Method 2 Source Testing on the stack of BH 500 to determine the flowrate through the baghouse. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Recordkeeping

N.9. If visual surveys are performed, 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 survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

N.10. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

N.11. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

N.12. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

N.13. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

O. EU030: Particle Board Press and Press Vents A, B, C, D

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
O.1, O.6, O.10, O.11, O.13, O.14, O.15	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
O.2, O.7, O.11, O.13, O.14, O.15	Total Particulate	4.4 lb/hr for all four combined	Method 5	Initial testing within 180 days of startup and then every two years	Semiannual
O.3, O.8, O.11, O.13, O.14, O.15	PM_{10}	4.4 lb/hr for all four combined	Method 201A	Initial testing within 180 days of startup and then every two years	Semiannual

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
O.4, O.9, O.12, O.14, O.15	Emissions from the particleboard presses	Controlled by a Biofilter, except as allowed under the approved Routine Control Device Maintenance Exemption	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
O.5, O.9, O.12, O.14, O.15	Biofilter Routine Control Device Maintenance Exemption	Maximum of 0.5% of the press annual operating uptime	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual

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(2)).

O.2. Press Vents A, B, C, and D (measured at the biofilter) shall be limited to 4.4 lb/hr of total particulate emissions for all four stacks combined (ARM 17.8.749).

O.3. Press Vents A, B, C, and D (measured at the biofilter) shall be limited to 4.4 lb/hr of PM_{10} emissions for all four stacks combined (ARM 17.8.749).

O.4. Emissions from the particleboard presses shall be controlled by a Biofilter, except as allowed under the approved Routine Control Device Maintenance Exemption specified in Appendix F (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

O.5. Roseburg's Routine Control Device Maintenance Exemption, as specified in Appendix F, shall not exceed 0.5 percent of the press annual operating uptime (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

Compliance Demonstration

O.6. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the Biofilter. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the Biofilter for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the Biofilter for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

O.7. Roseburg shall conduct testing of the biofilter for PM to demonstrate compliance with press vent emission limits in Section II.O.2. Following the completion of line 1 modernization project, testing shall occur within 180 days of initial startup and then testing and compliance demonstration shall take place at least once every two years, or on 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 (ARM 17.8.105, ARM 17.8.749 and ARM 17.8.1213).

O.8. Roseburg shall demonstrate compliance with Section III.O.3by conducting EPA Method 201A source testing on the biofilter to determine the PM_{10} emissions from the stacks. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. Following the completion of line 1 modernization project, testing shall occur within 180 days of initial startup and then testing and compliance demonstration shall take place at least once every two years, or on 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 (ARM 17.8.105, ARM 17.8.749 and ARM 17.8.1213).

O.9. Roseburg shall monitor compliance with Section III.O.4 and III.O.5 as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

Recordkeeping

O.10. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.O.6. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

O.11. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

O.12. Roseburg shall maintain all applicable recordkeeping requirements as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

Reporting

O.13. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

O.14. The annual compliance certification required by Section Q.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

O.15. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log;

c. Certification of compliance with 40 CFR 63, Subpart DDDD.

EU032: Sander Dust Boiler #1 (BOILER 1) and Baghouse 76

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
P.1, P.13, P.22, P.23, P.25, P.26, P.27	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
P.2, P.14, P.24, P.26, P.27	LFG Combustion	<14MMBtu/hr of LFG at any time in either the Sander Dust Boiler or Solagen Burner	Recordkeeping	Hourly	Semiannual
P.3, P.15, P.23, P.25, P.26, P.27	Total Particulate	1.6 lb/hr	Method 5	Initial testing within 180 days of low NOx burner startup and baghouses, then every 2 years	Semiannual
P.4, P.16, P.23, P.25, P.26, P.27	PM_{10}	4.7 lb/hr	Method 201A	Initial testing within 180 days of low NOx burner startup and baghouses, then every 2 years	Semiannual
P.5, P.6, P.17 P.23, P.25, P.26, P.27	NOx	35.7 lb/hr	Method 7E	Concurrent NOx and CO initial testing within 180 days of low NOx burner startup, then concurrent testing every 2 years	Semiannual
P.7, P.17, P.23, P.25, P.26, P.27	CO	18.8 lb/hr	Method 10	Concurrent NOx and CO initial testing within 180 days of low NOx burner startup, then concurrent testing every 2 years	Semiannual
P.8, P.9, P.19, P.24, P.26, P.27	Baghouse	Baghouse in Operation unless using Pipeline Quality Natural Gas	Programming or Administrative Control with log	Continuous	Semiannual

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirements
P.10, P.11, P.18, P.19, P.20, P.26, P.27	Opacity Monitor	Install and Operate Bag Leak Detector or Install COMS	40 CFR 60, Subpart Dc	Continuous	Semiannual
P.12, P.21, P.24, P.25, P.26	Fuel Usage	Fuel Consumption Records	40 CFR 60, Subpart Dc	Continuous	Semiannual

Conditions

P.1. Roseburg shall not cause or authorize to be discharged into the outdoor atmosphere, from the Sander Dust Boiler baghouse, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

P.2. Roseburg shall not combust more than 14 MMBtu/hour of LFG at any given time, in either the Sander Dust Boiler or the Solagen Burner (ARM 17.8.749).

P.3. Sander Dust Boiler Particulate matter (PM) emissions, shall not exceed 1.6 pounds per hour (lb/hr) excluding periods of startup, shutdown or malfunction. Condensable PM is not included in this limit (40 CFR 60, Subpart Dc, ARM 17.8.749 and ARM 17.8.752).

P.4. Sander Dust Boiler PM with an aerodynamic diameter of 10 microns or less (PM10), including the condensable portion, shall not exceed 4.7 lb/hr (ARM 17.8.749 and ARM 17.8.752).

P.5. The Sander Dust Boiler shall be controlled with low NOx burners and when combusting sander dust shall also require baghouse control (ARM 17.8.749 and ARM 17.8.752).

P.6. Sander Dust Boiler NOx emissions shall not exceed 35.7 lb/hr (ARM17.8.749).

P.7. Carbon monoxide (CO) emissions from the Sander Dust boiler shall not exceed 18.8 lb/hr (ARM 17.8.749).

P.8. The Sander Dust Boiler exhaust may bypass the baghouse and vent to atmosphere when solely combusting pipeline quality natural gas and utilizing good combustion practices (ARM 17.8.752).

P.9. Roseburg shall provide the necessary process control to ensure that the baghouse is not bypassed when switching from combusting natural gas back to combusting sander dust or alternatively, document administrative procedures in place to prevent inadvertent baghouse bypass (ARM 17.8.749).

P.10. Roseburg shall either install and operate a bag leak detection system on the Sander Dust Boiler baghouse or shall install and operate a continuous opacity monitoring system (COMS) If Roseburg opts to install and operate a COMS, all COMS requirements as identified in 40 CFR 60, Subpart Dc must be met (17.8.340 and 40 CFR 60, Subpart Dc).

P.11. The Sander Dust Boiler shall comply with all applicable standards and limitations-in 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

P.12. Roseburg shall record and maintain by day, the amount of each fuel combusted during each operating day and maintain these records for at least two years (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

Compliance Demonstration

P.13. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the Sander Dust Boiler baghouse. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the Boiler #1 for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the Boiler #1 that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

P.14. Roseburg shall document, by hour, the heat rate in MMBtu/hr from burning LFG in the Sander Dust Boiler. By the 25th day of each month, Roseburg shall summarize the highest heat rates combusted of LFG in the Sander Dust Boiler during the previous month. The monthly information will be used to verify compliance with the limitation contained in Section III.P.2. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

P.15. Roseburg shall demonstrate compliance with Section III.P.3 conducting EPA Method 5 source testing on the Sander Dust Boiler baghouse to determine the total particulate matter emissions from the stack. Testing shall be conducted within 180 days of initial startup (following the installation of the new low NOx burners and baghouse) and then testing shall continue on an every 2-year basis, or 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 Boiler (ARM 17.8.105, ARM 17.8.749 and ARM 17.8.1213).

P.16. Roseburg shall demonstrate compliance with Section III.P.4 by conducting EPA Method 201A source testing on the Sander Dust Boiler baghouse to determine the PM_{10} emissions from the stack. Method 5 results may be used as a surrogate for PM_{10} if the impinger analysis ("back-half") is included. Testing shall be conducted within 180 days of initial startup (following the installation of the new low NOx burners and baghouse) and then testing shall continue on an every 2-year basis, or 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 Boiler (ARM 17.8.105, ARM 17.8.749 and ARM 17.8.1213).

P.17. Roseburg shall demonstrate compliance with Section III.P.6 and Section III.P.7 by conducting EPA Methods 7E and 10 on the Sander Dust Boiler baghouse for NOx and CO, concurrently. Testing shall be conducted within 180 days of initial startup (following the installation of the new low NOx burners) and then the testing shall continue on an every 2-year basis, or another testing/monitoring schedule as may be approved by the Department. All source testing shall occur while Roseburg is using sander dust as the fuel (ARM 17.8.105, ARM 17.8.749 and ARM 17.8.1213).

P.18. If opacity monitors are required by the Department at the sander dust boiler abort stack, Roseburg shall document, monthly, that the opacity monitors were installed and operating to monitor compliance with Section III P.10 (ARM 17.8.1213).

P.19. Roseburg shall document that the baghouse is in operation unless the Sander Dust Boiler is combusting pipeline quality natural gas and maintain a monthly log when the baghouse is being bypassed. The monthly information will be used to verify compliance with Section III.P.8 (ARM 17.8.749 and ARM 17.8.1213).

P.20. On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, Roseburg shall not exceed a 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. This opacity standard does not apply during period of startup, shutdown or malfunction (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

P.21. The Sander Dust Boiler shall comply with all applicable the reporting requirements contained in in 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (ARM 17.8.340 and 40 CFR 60, Subpart Dc).

Recordkeeping

P.22. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.P.13. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

P.23. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

P.24. Roseburg shall maintain the records required by Section III.P.12, Section III.P.14 and Section III.P.19 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

P.25. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

P.26. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

P.27. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified including compliance with 40 CFR 60 Subpart Dc.

P. EU033: Roemmc Burner (ROEMMC)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
Q.1, Q.8, Q.14, Q.15, Q.17, Q.18, Q.19	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
Q.2, Q.9, Q.15, Q.17, Q.18, Q.19	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department and Section III.A.1	Semiannual
Q.3, Q.10, Q.16, Q.18, Q.19	Sander Dust Combustion	23,000 Tons per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
Q.4, Q.11, Q.15, Q.17, Q.18, Q.19	NO_x	115.0 lb/hr	Method 7E	Every 5 Years	Semiannual
Q.5, Q.11, Q.15, Q.17, Q.18, Q.19	CO	100.0 lb/hr	Method 10	Every 5 Years	Semiannual

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
Q.6, Q.12, Q.15, Q.17, Q.18, Q.19	VOC	0.35 lb/hr	Method 18, Method 25, or Method 25A (as determined by the Department)	As Required by the Department and Section III.A.1	Semiannual
Q.7, Q.13, Q.16, Q.18, Q.19	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

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(2)).

Q.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).

Q.3. Roseburg shall not combust more than 23,000 tons of sander dust in the Roemmc Burner during any rolling 12-month time period (ARM 17.8.749).

Q.4. Emissions of NO_x from the Roemmc Burner shall not exceed 115.0 lb/hr (ARM 17.8.749 and ARM 17.8.752).

Q.5. Emissions of CO from the Roemmc Burner shall not exceed 100.0 lb/hr (ARM 17.8.749 and ARM 17.8.752).

Q.6. Emissions of VOCs from the Roemmc Burner shall not exceed 0.35 lb/hr (ARM 17.8.749 and ARM 17.8.752).

Q.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 17.8.749).

Compliance Demonstration

Q.8. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the Roemmc. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the Roemmc for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall

immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the Roemmc that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

Q.9. Roseburg shall monitor compliance with Section III.Q.2 by conducting EPA Method 5 source testing on the burner to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Q.10. Roseburg shall document, by month, the amount of sander dust combusted in the Roemmc Burner. By the 25th day of each month, Roseburg shall total the amount of sander dust combusted in the Roemmc Burner during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.Q.3. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

Q.11. Roseburg shall monitor compliance with Sections III.Q.4 and III.Q.5 by conducting EPA Methods 7E and 10 source testing on the Roemmc Burner emissions for NO_x and CO, concurrently. The testing and compliance monitoring of emissions from the stack 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 17.8.105, ARM 17.8.749, and ARM 17.8.1213).

Q.12. Roseburg shall monitor compliance with Section III.Q.6 by conducting EPA Methods 18, 25, or 25A (as determined by the Department) source testing on the Roemmc Burner emissions for VOCs. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

Q.13. If opacity monitors are required by the Department at the Roemmc Burner abort stack, Roseburg shall document, monthly, that the opacity monitors were installed and operating to monitor compliance with Section III.Q.7 (ARM 17.8.1213).

Recordkeeping

Q.14. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.Q.8. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

Q.15. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Q.16. Roseburg shall maintain the records required by Section III.Q.10, and III.Q.13 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

Q.17. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

Q.18. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

Q.19. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified.

Q. EU047: Solagen Burner (SOLAGEN)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
R.1, R.10, R.18, R.19, R.21, R.22, R.23	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
R.2, R.11, R.19, R.21, R.22, R.23	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department and Section III.A.1	Semiannual
R.3, R.12, R.20, R.22, R.23	Sander Dust Combustion	21,745 Tons per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
R.4, R.13, R.20, R.22, R.23	Natural Gas Combustion	<352.1 MMscf per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
R.5, R.14, R.20, R.22, R.23	LFG Combustion	<14 MMBtu/hr of LFG at any time in the Sander Dust Boiler or Solagen Burner	Recordkeeping	Hourly	Semiannual
R.6, R.15, R.19, R.21, R.22, R.23	NO_x	31.5 lb/hr	Method 7E	Every 5 Years	Semiannual
R.7, R.15, R.19, R.21, R.22, R.23	CO	15.6 lb/hr	Method 10	Every 5 Years	Semiannual
R.8, R.16, R.19, R.21, R.22, R.23	VOC	0.09 lb/hr	Method 18, Method 25, or Method 25A (as determined by the Department)	As Required by the Department and Section III.A.1	Semiannual
R.9, R.17, R.20, R.22, R.23	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

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(2)).

R.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).

R.3. Roseburg shall not combust more than 21,745 tons of sander dust in the Solagen Burner during any rolling 12-month time period (ARM 17.8.749).

R.4. Roseburg shall not combust more than 352.1 million standard cubic feet (MMscf) of natural gas in the Solagen Burner during any rolling 12-month time period (ARM 17.8.749).

R.5. Roseburg shall not combust more than 14 MMBtu/hr of LFG, at any given time, in the Sander Dust Boiler, or the Solagen Burner (ARM 17.8.749).

R.6. Emissions of NO_x from the Solagen Burner shall not exceed 31.5 lb/hr (ARM 17.8.749).

R.7. Emissions of CO from the Solagen Burner shall not exceed 15.6 lb/hr (ARM 17.8.749).

R.8. Emissions of VOCs from the Solagen Burner shall not exceed 0.09 lb/hr (ARM 17.8.749).

R.9. The Department reserves the right to require opacity monitors at the Solagen 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 17.8.749).

Compliance Demonstration

R.10. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the Solagen. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the Solagen for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the Solagen that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

R.11. Roseburg shall monitor compliance with Section III.R.2 by conducting EPA Method 5 source testing on the burner to determine the total particulate matter emissions from the stack. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

R.12. Roseburg shall document, by month, the amount of sander dust combusted in the Solagen Burner. By the 25th day of each month, Roseburg shall total the amount of sander dust combusted in the Solagen Burner during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.R.3. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

R.13. Roseburg shall document, by month, the amount of natural gas combusted in the Solagen Burner. By the 25th day of each month, Roseburg shall total the amount of natural gas combusted in the Solagen Burner during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.R.4. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

R.14. Roseburg shall document, by hour, the heat rate in MMBtu/hr from burning LFG in the Solagen Burner. By the 25th day of each month, Roseburg shall summarize the highest heat rates combusted of LFG in the Solagen Burner during the previous month. The monthly information will be used to verify compliance with the limitation contained in Section III.R.4. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749 and ARM 17.8.1213).

R.15. Roseburg shall monitor compliance with Sections III.R.6 and III.R.7 by conducting EPA Methods 7E and 10 source testing on the Solagen Burner emissions for NO_x and CO, concurrently. The testing and compliance monitoring of emissions from the stack shall take place every two years, 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 Solagen 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, ARM 17.8.749, and ARM 17.8.1213).

R.16. Roseburg shall monitor compliance with Section III.R.8 by conducting EPA Methods 18, 25, or 25A (as determined by the Department) source testing on the Solagen Burner emissions for VOCs. The testing and compliance monitoring of emissions from the stack shall take place as required by the Department and Section III.A.1, 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. The Department may require additional testing (ARM 17.8.1213).

R.17. If opacity monitors are required by the Department at the Solagen Burner abort stack, Roseburg shall document, monthly, that the opacity monitors were installed and operating to monitor compliance with Section III.R.8 (ARM 17.8.1213).

Recordkeeping

R.18. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.R.10. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

R.19. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

R.20. Roseburg shall maintain the records required by Section III.R.12, III.R.13, and III.R.14 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

R.21. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

R.22. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

R.23. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified.

R. EU036: Outside Truck Dump (FUG 50)
EU037: Pile Reclaim (FUG 51)
EU038: Radial Stacker (FUG 52)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
S.1, S.2, S.3, S.4, S.5, S.6, S.7	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	

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(2)).

Compliance Demonstration

S.2. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the EU36-EU38. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the EU36-EU38 for any visible

emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the EU36-EU38 that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

Recordkeeping

S.3. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.S.2. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

S.4. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

Reporting

S.5. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

S.6. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

S.7. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period; and

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

S. EU048: Board Cooler Vents 1, 2, and 3 (BH74A and BH74B)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
T.1, T.7, T.13, T.14, T.16, T.17, T.18	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
T.2, T.8, T.14, T.16, T.17, T.18	Total Particulate	0.002 gr/dscf	Method 5	Initial testing within 180 days and then as required by the Department	Semiannual
T.3, T.9, T.14, T.16, T.17, T.18	PM_{10}	0.002 gr/dscf	Method 201A	Initial testing within 180 days and as required by the Department	Semiannual
T.4, T.10, T.14, T.16, T.17, T.18	Flow Rate	120,000 dscfm	Method 2	Initial testing within 180 days and then as required by the Department	Semiannual
T.5, T.11, T.15, T.17, T.18	Baghouses	Operate and maintain	Recordkeeping	Monthly	Semiannual
T.6, T.12, T.15, T.17, T.18	Operational Limit	8,500 Hours During any Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual

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(2)).

T.2. Emissions of Total Particulate from BH74A and BH74B shall not exceed 0.002 gr/dscf of exhaust gas from each baghouse (ARM 17.8.749).

T.3. Emissions of PM_{10} from BH74A and BH74B shall not exceed 0.002 gr/dscf of exhaust gas (ARM 17.8.749).

T.4. The flowrate through each baghouse shall not exceed the following flowrates as measured in dscfm (ARM 17.8.749):

BH74A and BH74B flowrates combined: 120,000 dscfm

T.5. Roseburg shall operate and maintain BH74A and BH74B to control emissions from the board cooler vents (ARM 17.8.749).

T.6. The board cooler is limited to a total of 8,500 hours of operation during any rolling 12-month period (ARM 17.8.749).

Compliance Demonstration

T.7. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions for the common baghouse stack listed in this section. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey each baghouse listed in this section for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Source of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Source shall perform the Method 9 source tests on each baghouse listed in this section for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

T.8. Roseburg shall monitor compliance by conducting EPA Method 5 source testing on BH74A and BH74B emissions for PM to demonstrate compliance with the emission limits contained in Section II.T.2. Testing shall be conducted within 180 days of initial startup (following the installation of the baghouses) and then testing as required by the Department (ARM 17.8.1213).

T.9. Roseburg shall monitor compliance with Section III.T.3 by conducting EPA Method 201A source testing on BH74A and BH74B emissions for to determine the PM_{10} emissions from the stack. Testing shall be conducted within 180 days of initial startup (following the installation of the baghouses) and then testing as required by the Department (ARM 17.8.1213).

T.10. Roseburg shall monitor compliance with Section III.T.4 by conducting EPA Method 2 Source Testing on the stack of each baghouse to determine the flowrate through the baghouse. Testing shall be conducted within 180 days of initial startup (following the installation of the baghouses) and then testing as required by the Department. 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).

T.11. Roseburg shall monitor compliance with Section III.T.5 by documenting, monthly, that each baghouse was operated and maintained on their respective emitting units. The records shall include all repair and maintenance activity to each baghouse. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

T.12. Roseburg shall monitor compliance with Section III.T.6 by documenting, monthly, the hours that the board cooler was operated. (ARM 17.8.1213).

Recordkeeping

T.13. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.T.7. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

T.14. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

T.15. Roseburg shall maintain the records required by Section III.T.11 and III.T.12 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

T.16. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

T.17. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

T.18. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log; and

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified.

T. DRY200

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Compliance Demonstration Frequency	Reporting Requirements
U.1, U.7, U.12, U.17, U.18,	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	Semiannual
U.2, U.8, U.13, U.16, U.17, U.18	Total Particulate Matter DRY 200	6.50 lb/hr	Method 5	Initial testing within 180 days and then every 5 Years	Semiannual
U.3, U.9, U.13, U.16, U.17, U.18	Total PM_{10} DRY 200	6.50 lb/hr	Method 201A	Initial testing within 180 days and then every 5 Years	Semiannual
U.4, U.10, U.14, U.17, U.18	Furnish Inlet Moisture Content	24-hour block average of less than or equal to 30% (by weight, dry basis)	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
U.5, U.10, U.14, U.17, U.18	Inlet Dryer Temperature	24-hour block average of less than or equal to 600 °F	40 CFR 63, Subpart DDDD	40 CFR 63, Subpart DDDD	Semiannual
U.6, U.11, U.15, U.17, U.18	Particulate Emissions	Operate and Maintain Multiclones	Recordkeeping	Monthly	Semiannual

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 17.8.752).

U.2. Total particulate matter (PM) emissions from the DRY200 stack shall not exceed 6.5 pounds per hour (lb/hr) (ARM 17.8.749).

U.3. Emissions of total PM_{10} from the DRY200 stack shall not exceed 6.5 lb/hr (ARM 17.8.749).

U.4. Roseburg must process furnish with a 24-hour block average inlet moisture content of less than or equal to 30% (by weight, dry basis) (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

U.5. Roseburg shall install and operate temperature sensors at the inlet of the dry rotary dryers (Final Dryers). 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 the combustion units. The alarm system shall become activated when the 24-hour block average inlet dryer temperature exceeds 600 ºF. 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 and 40 CFR 63, Subpart DDDD).

U.6. Each dryer shall be equipped with multiclone control that is operated and maintained to meet the appropriate emission limits as specified in Sections III.U.1, III.U.2, and III.U.3 (ARM 17.8.752).

Compliance Demonstration

U.7. Roseburg shall conduct either a semiannual Method 9 source test or a weekly visual survey of visible emissions on the stack for DRY200. Under the visual survey option, once per calendar week, during daylight hours, Roseburg shall visually survey the affected source for any visible emissions. If visible emissions are observed during the visual survey, Roseburg must conduct a Method 9 source test. The Method 9 source test must begin within one hour of any observation of visible emissions. If visible emissions meet or exceed 15% opacity based on the Method 9 source test, Roseburg shall immediately take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Roseburg shall immediately conduct a subsequent visual survey (and subsequent Method 9 source test if visible emissions remain) to monitor compliance. The person conducting the visual survey shall record the results of the survey (including the results of any Method 9 source test performed) in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of the liability for a violation determined using Method 9 (ARM 17.8.101(27)).

If the visual surveys are not performed once per calendar week as specified above during the reporting period, then Roseburg shall perform the Method 9 source tests on the affected source for that reporting period.

Method 9 source tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual, 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).

U.8. Roseburg shall monitor compliance by conducting EPA Method 5 source testing on Dry200 for PM to demonstrate compliance with the emission limits in Section III.U.2, within 180 days of initial startup, and then testing and compliance demonstration shall take place at least once every 5 years for each unit or on another testing/monitoring schedule as may be approved by the Department (ARM 17.8.1213).

U.9. Roseburg shall monitor compliance with Section III.U.3 by conducting EPA Method 201A source testing on DRY200 emissions for to determine the PM_{10} emissions from the stack. Testing shall be conducted within 180 days of initial startup (following the installation of the baghouses) and then testing shall continue on an every 5-year basis, or another testing/monitoring schedule as may be approved by the Department (ARM 17.8.1213).

U.10. Roseburg shall monitor compliance with Section III.U.4 and III.U.5 as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

U.11. Roseburg shall monitor compliance with Section III.U.6 by documenting monthly, that the multiclones are operated and maintained on each dryer to meet the emission limits as specified in Section III.U.2 and III.U.3. The records shall include all repair and maintenance activity to the multiclones. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

Recordkeeping

U.12. If visual surveys are performed, Roseburg shall maintain a log to verify that the visual surveys were performed as specified in Section III.U.7. Each log entry must include the date, time, results of survey (and results of subsequent Method 9, if applicable), and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventive or corrective action taken must be recorded in the log (ARM 17.8.1212).

U.13. All compliance source test recordkeeping shall be performed in accordance with the test method used and the Montana Source Test Protocol and Procedures Manual, and shall be maintained on site (ARM 17.8.106 and ARM 17.8.1212).

U.14. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).

U.15. Roseburg shall maintain the records required by Sections III.U.6 on site and submit the information to the Department upon request (ARM 17.8.1212).

Reporting

U.16. Any compliance source test reports must be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

U.17. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

U.18. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of the results of any compliance test conducted during the last reporting period;

b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log;

c. Reports of any required monitoring performed during the reporting period, with all instances of deviations from any permit requirements identified; and

d. Certification of compliance with 40 CFR 63, Subpart DDDD

U. **Emergency Generator**

Conditions

V.1. Roseburg may not cause or authorize any emissions from emergency/back-up diesel generator to be discharged into the outdoor atmosphere that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).

V.2. Roseburg shall not cause or authorize particulate matter, caused by the combustion of fuel from new fuel-burning equipment (installed after November 23, 1968), to be discharged from any stack or chimney into the outdoor atmosphere in excess of the value calculated by $E=1.026*H^{-0.233}$, where H is the heat input capacity in MMBtu per hour and E is the maximum allowable particulate emissions rate in lb/MMBtu (ARM 17.8.309).

V.3. The emergency/back-up diesel generator shall not burn liquid or solid fuels containing sulfur in excess of 1 lb/MMBtu fired, unless otherwise specified by rule or in this permit (ARM 17.8.322(4)).

V.4. The emergency/back-up diesel generator shall only be operated during periods when electric power from the local utility is interrupted or as necessary for routine maintenance of the generator (ARM 17.8.749).

V.5. Roseburg shall comply with all applicable requirements of 40 CFR 63 Subpart ZZZZ – NESHAPS: Stationary Reciprocating Internal Combustion Engines (17.8.342 and 40 CFR 63 Subpart ZZZZ).

Compliance Demonstration

V.6. As required by the Department and Section III.**Error! Reference source not found.**, Roseburg shall test the emergency/back-up diesel generator for opacity, and monitor compliance with the limitation contained in Section III.V.1. The test methods and procedures shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.105 and ARM 17.8.106).

V.7. Compliance with the particulate from fuel combustion requirement and the sulfur in fuel requirement in Sections III.V.2 and III.V.3 shall be satisfied by burning distillate (diesel) fuel only (ARM 17.8.1213).

V.8. Compliance with Section III.V.4 shall be demonstrated by logging the hours of operation, reason for use, and operators' initials whenever the emergency/back-up diesel generator is operated (ARM17.8.1213).

V.9. Roseburg shall demonstrate compliance with 40 CFR 63 Subpart ZZZZ through applicable testing and initial compliance requirements, continuous compliance requirements, notifications, reports, and records, and other requirements for owners and operators and information as defined and required by 40 CFR 63 Subpart ZZZZ (ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

Recordkeeping

V.10. All source test recordkeeping shall be performed in accordance with the test method used, and shall be maintained on site. Method 9 source test reports for opacity need not be submitted unless requested by the Department (ARM 17.8.106).

V.11. Roseburg shall maintain fuel use records to verify compliance with the particulate matter fuel-burning limit in Section III.V.2 and the sulfur in fuel limit in Section III.V.3 (ARM 17.8.1212).

V.12. Roseburg shall maintain on site a log as described in Section III.V.8. Roseburg shall include in that log the fuel type used whenever the emergency/back-up generator is used for emergency power generation. In addition, on a monthly basis Roseburg shall sum the total hours of operation of the the emergency/back-up generator for the current month (ARM 17.8.1212).

V.13. Roseburg shall comply with all applicable recordkeeping requirements as required by 40 CFR 63 Subpart ZZZZ (17.8.342 and 40 CFR 63 Subpart ZZZZ).

Reporting

V.14. Roseburg shall comply with all applicable reporting requirements as required by 40 CFR 63 Subpart ZZZZ (17.8.342 and 40 CFR 63 Subpart ZZZZ).

V.15. The annual compliance certification required by Section V.**Error! Reference source not found.** must contain a certification statement for the applicable requirements (ARM 17.8.1212).

V.16. The semiannual monitoring report shall provide (ARM 17.8.1212):

a. A summary of results of any source testing conducted in accordance with Section III.V.6 during that semiannual period.

b. A summary showing that only diesel fuel was used to fire the emergency/back-up diesel generator whenever a generator was utilized.

SECTION IV. NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emissions unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list was submitted as part of previous permit applications. The following list does not preclude the need to comply with any new requirements that may become applicable during the permit term.

Roseburg did not request a shield from any of the Air Quality Administrative Rules of Montana (ARM) or any Federal Regulations.

A. Facility-Wide

The following table contains non-applicable requirements which are administrated by the Air Resources Management Bureau of the Department of Environmental Quality.

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 62 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 Units

The permit application identified applicable requirements: non-applicable requirements for individual or specific emission units were not listed. The Department has listed all non-applicable requirements (submitted in previous applications) in Section IV.A, these requirements relate to each specific unit, as well as facility wide.

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)-(d)

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 February 15 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 identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;

   c. The status of compliance with each term and condition for the period covered by the certification, *including whether compliance during the period was continuous or intermittent* (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and

   d. Such other facts 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 Section 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 Section 7651g(a) of the FCAA;

d. The ability of the administrator to obtain information from a source pursuant to Section 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; and

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 & O).

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 February 15 and August 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted on February 15 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 August 15 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 to the Department within the following timeframes (unless otherwise specified in an applicable requirement):

1. For deviations which result in emissions potentially in violation of permit limitations:

   a. An initial phone notification (or faxed or electronic notification) describing the incident within 24 hours (or the next business day) of discovery; and,

   b. A follow-up written, faxed, or electronic report within 30 days of discovery of the deviation that describes the probable cause of the reported deviation and any corrective actions or preventative measures taken.

2. For deviations attributable to malfunctions, deviations shall be reported to the Department in accordance with the malfunction reporting requirements under ARM 17.8.110; and

3. For all other deviations, deviations shall be reported to the Department vie a written, faxed, of electronic report within 90 days of discovery (as determined through the routine internal review by the permittee).

Prompt deviation reports do not need to be resubmitted with the regular semiannual (or other routine) reports, but may be referenced by the date of submittal.

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; and

   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; and

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 a Montana Air Quality 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; and

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; and

   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; or

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. Montana Air Quality Permits

ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources §745 and 764:)

1. Except as specified, no person shall construct, install, modify 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 17.8.744(1)(a)-(k).

2. The permittee shall comply with ARM 17.8.743, 744, 745, 748, and 764.

3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding a Montana Air Quality Permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 5 tons per year of any pollutant, except):

    a. Any construction or changed condition that would violate any condition in the facility's existing MAQP or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2);

    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 5 tons per year may not be artificially split into smaller projects to avoid a Montana Air Quality Permitting; or

    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(1) 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(1).

Z. National Emission Standard for Asbestos
40 CFR 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 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 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:

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 emissions 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 in previous operating permit applications and/or the current renewal application. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

Emissions Unit ID	Description
IEU01	Auxiliary Diesel Generators (I2)
IEU02	Degreasing (I7)
IEU03	Portable Heaters (I9)
IEU04	Wax Pump (I15)
IEU05	Gas Powered Sump Pump (I2)
IEU06	Fire Pond Dredging (I120)
IEU07	Diesel Tank (I23)
IEU08	Gasoline Storage Tank (I22)
IEU09	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	Degreasing (I7)
IEU21	Non Processing Heaters (NPHEAT)
IEU27	Melamine Press Vents (FUG)
IEU28	Melamine Burner (INTEC)

Appendix B DEFINITIONS and ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 U.S. 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 which 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 emission 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 Montana Air Quality 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.

"Excess Emissions" means any visible emissions from a stack or source, viewed during the visual surveys, that meets or exceeds 15% opacity (or 30% opacity if associated with a 40% opacity limit) during normal operating conditions.

"Emissions 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.

"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 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 which 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 emission 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 Montana Air Quality 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.

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 foot
dscfm	dry standard cubic foot per minute
EEAP	Emergency Episode Action Plan
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
EU	emissions unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
IEU	insignificant emissions 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
NOx	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
SOx	oxides of sulfur
TPY	tons per year
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

Appendix C NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality Bureau
P.O. Box 200901
Helena, MT 59620-0901

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

Permit Modifications:

Montana Department of Environmental Quality
Air, Energy & Mining Division
Air Quality 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
1595 Wynkoop St.
Denver, CO 80202-1129

Appendix D AIR QUALITY INSPECTOR INFORMATION

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

1. **Direction to Plant:** The facility is located approximately one mile northwest of the city limits of Missoula, Montana at 3300 Raser Road. The mailing address of the facility is P.O. Box 4007, 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, additional PPE may be required.

3. **Facility Plot Plan:** An updated facility plot plan was submitted as part of the operating permit renewal application submitted on January 8, 2007, and is on file with the Department.

Appendix E COMPLIANCE ASSURANCE MONITORING (CAM)

Emitting Unit: EU008 –Predryer (DRY 500)
Pollutant: PM_{10}
Control Device: Regenerative Thermal Oxidizer (RTO)
Emission Limit: 6.21 lb/hr
Monitoring Approach: The monitoring approach for this CAM applicable emitting unit is contained in Table I below.

Table I	
A. General Criteria	
Indicator	RTO Combustion Chamber Temperature
Measurement Approach	Combustion bed temperature as measured by temperature measuring device. Specifications of the temperature measuring device will be no less rigorous that that required by the Plywood and Composite Wood Product NESHAP (40 CFR Subpart DDDD).
Indicator Range	The lower end temperature value will be established to monitor compliance. An excursion occurs if the three hour average temperature drops below its respective three hour average temperature value. The indicator value has been established during the source test. An excursion triggers an inspection/investigation, corrective action, and a reporting requirement.
B. Performance Criteria	
Data Representativeness	The temperature is measured and recorded using the continuous parameter monitoring system (CPMS) specifically designed and installed on the RTO to measure and control the performance.
Verification of Operational Status	Continuous monitoring of RTO combustion chamber temperature.
Quality Assurance/Quality Control	Temperature sensors will be inspected quarterly for continuity, oxidation and galvanic corrosion. Temperature sensors will be calibrated semiannually using the process outlined in 40 CFR 63.2269(b)(4).
Monitoring Frequency	Continuous (at least every 15 minutes)
Data Collection Procedures	Continuous temperature readout in the Line 1 M & D control area. Every fifteen minutes the CPMS will record the temperature for that moment. This methodology will provide 12 recorded power readings per three-hour block. The data will be stored in an electronic database and printed out in paper form for a minimum of five years storage.
Averaging Period	An arithmetic average of the data collected for each given 3-hour block will be generated.

B. Performance Criteria	
Stack Test/Monitoring Initiation	Roseburg conducted a Method 5/202 test to establish a initial minimum temperature values. The indicator value was established pursuant to 40 CFR §63.2262(l)(1) as the average of the three minimum 15-minute temperatures monitored during the three test runs. The temperature value may be modified during subsequent stack tests if compliance with the particulate limit is demonstrated during that test.

Appendix F Routine Control Device Maintenance Exemption

Presses
Control Device for Which the Exemption is Approved: Biofilter
Process Equipment Controlled: Exhaust gas from particleboard presses
Duration and Frequency of Maintenance Procedure for Which the Exemption is Approved: See Table 1 (not to exceed 0.5% of the press annual operating uptime)

Table 1: Biofilter Maintenance Exemption

Maintenance Procedures	Duration	Frequency
Biofilter Nozzle Inspection and Replacement	5 hours	Monthly
Biofilter Plumping Inspection and Repair	4 hours	Monthly
Biofilter Media Cleaning	40 hours	Annually
Biofilter Media Changeout	96 hours	Approximately every 10 years

Predryer
Control Device for Which Exemption is Approved: RTO
Process Equipment Controlled: Exhaust gas from particleboard green dryer (predryer)
Duration and Frequency of Maintenance Procedure for Which the Exemption is Approved: See Table 2 (not to exceed 3% of the predryer annual operating uptime)

Table 2: RTO Maintenance Exemption

Maintenance Procedures	Duration	Frequency
RTO Bakeout	12-16 hours	Quarterly
RTO Washout	72 hours	Semiannual
RTO Media Changeout	5 days	Approximately every 3-5 years
ESP Screen Cleaning	8-10 hours	Every 2 weeks