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October 7, 2011

Ellen Porter  
Roseburg Forest Products – Missoula Particleboard  
P.O. Box 4007  
Missoula, MT 59806

**RE: Administrative Amendment Title V Operating Permit #OP2303-06**

Dear Ms. Porter:

The Department of Environmental Quality has prepared the enclosed Final Operating Permit #OP2303-06, 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 #OP2303-06.

If you have any questions, please contact Vickie Walsh, the permit writer, at (406) 444-9741 or by email at [VWalsh@mt.gov](mailto:VWalsh@mt.gov).

Sincerely,

Vickie Walsh  
Air Permitting Program Supervisor  
Air Resources Management Bureau  
(406) 444-9741

VW:

Enclosure

Cc: Christopher Ajayi, US EPA Region VIII 8P-AR  
Carson Coat, US EPA Region VIII, Montana Office

STATE OF MONTANA  
Department of Environmental Quality  
Helena, Montana 59620



**AIR QUALITY OPERATING PERMIT OP2303-06**

Issued to: **Roseburg Forest Products  
Missoula Particleboard  
P.O. Box 1088  
Roseburg, OR 97470**

Final Date: **10/07/2011**  
Expiration Date: **07/07/2013**

Effective Date: **10/07/2011**  
Date of Decision: **09/06/2011**

Application Deemed Technically Complete: **08/08/2011**  
Application Deemed Administratively Complete: **08/08/2011**  
Administrative Amendment Application Received: **07/22/2011**  
AFS Number: 030-**063-0002A**

**Permit Issuance and Appeal Processes:** In accordance with Montana Code Annotated (MCA) Sections 75-2-217 and 218 and the Administrative Rules of Montana (ARM), ARM Title 17, Chapter 8, Subchapter 12, Operating Permit Program, this operating permit is hereby issued by the Department of Environmental Quality (Department) as effective and final on October 7, 2011. This permit must be kept on-site at the above named facility.

Montana Air Quality Operating Permit  
Department of Environmental Quality

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

## SECTION I. GENERAL INFORMATION

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(s):	Chuck Ulik	Phone: (541) 679-3311
	Grady Mulbery	(541) 679-331
	Mark Allen	(406) 782-3910

Facility Contact Person:	Ellen Porter	Phone: (541) 679-2130
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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	#1 Dryer Line 1 (DRY 100)	Multiclone
EU003	#2 Dryer Line 1 (DRY 101)	Multiclone
EU004	#3 Dryer Line 1 (DRY 102)	Multiclone
EU005	#4 Dryer Line 1 (DRY 103)	Multiclone
EU006	#5 Dryer Line 2 (DRY 200)	Multiclone
EU007	#6 Dryer Line 2 (DRY 201)	Multiclone
EU008	Predryer (DRY 500)	Medium Efficiency Cyclone, WESP, and RTO
EU010	Outside Truck Dump (BH 50)	Baghouse
EU011	Milling and Drying (BH 55)	Baghouse
EU046	Predryer Storage Silo (BH 60)	Baghouse
EU012	Reject System Line 1 (BH 100)	Baghouse
EU013	Reject System Relay Line 1 (BH 101)	Baghouse
EU014	5 X 25 Board Trimsaws System (BH 102)	Baghouse
EU015	5 X 16 Board Trimsaws System (BH 103)	Baghouse
EU016	Core Air System Line 2 (BH 201)	Baghouse
EU017	Face Air System Line 2 (BH 200)	Baghouse
EU018	Mat Trim System Line 2 (BH 202)	Baghouse
EU019	Board Trim System Line 2 (BH 203)	Baghouse
EU020	Board Trim System Line 2 Relay (BH 204)	Baghouse
EU021	Six Head Sander System (BH 300A & BH 300B)	Two Baghouses
EU023	Six Head and Reman Flatline Relay (BH 301)	Baghouse
EU024	Eight Head Sander System (BH 302 & BH 303)	Two Baghouses
EU026	Eight Head Sander Relay (BH 304)	Baghouse
EU027	Reman Flat Line Sander Relay (BH 400)	Baghouse
EU028	Schilling & Bullnose Saw and Edge Bander Line (BH 401)	Baghouse
EU029	Schilling & Bullnose System Relay and Edge Bander Line (BH 404)	Baghouse
EU055	Melamine Baghouse (BH 500)	Baghouse
EU030	Press Vents 1, 2, 3, & 4 Line 1 (PRESS 100)	Biofilter
EU048	Line 1 Board Cooler Vents 1, 2, & 3 (L1BCV1, L1BCV2, & L1BCV3)	None
EU031	Press Vents 1, 2, 3, & 4 Line 2 (PRESS 200)	Biofilter
EU049	Line 2 Board Cooler Vents 1 & 2 (L2BCV1 & L2BCV2)	None
EU032	Boiler #1 (BOILER #1)	Multiclone
EU033	Roemmc Burner (ROEMMC)	Multiclone
EU047	Solagen Burner (SOLAGEN)	Medium Efficiency Cyclone and WESP
EU035	Line 2 Oil Heater (GEKA 200)	None
EU056	Regenerative Thermal Oxidizer (RTO)	None
EU036	Outside Truck Dump (FUG 50)	Cover
EU037	Pile Reclaim (FUG 51)	None
EU038	Radial Stacker (FUG 52)	None
EU050	Bullnose Fugitives (FUG 400)	None
EU051	Paintline Fugitives (FUG 401)	None

### SECTION III. PERMIT CONDITIONS

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

#### A. Facility-Wide

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 17.8.342	NESHAPs General Provisions	SSM Plans	Submittal
A.13	Chapter 32 of the State of Montana Air Quality Control Implementation Plan (Chapter 4 of the Missoula City-County Air Pollution Control Program)	Missoula County's Emergency Episode Plan	Emergency Episodes	Reduce emissions in accordance with each stage of the emergency episode avoidance plan
A.14	ARM 17.8.749	Conditions for Issuance of Permit	Recordkeeping	-----
A.15	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-----
A.16	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:

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

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 17.8.342 and 40 CFR 63.6, Roseburg shall submit to the Department a copy of any startup, shutdown, and malfunction (SSM) plan required under 40 CFR 63.6(e)(3) within 30 days of the effective date of this operating permit (if not previously submitted), within 30 days of the compliance date (or approved compliance extension date) of any new National Emission Standard for Hazardous Air Pollutants (NESHAPs) or Maximum Achievable Control Technology (MACT) standard, and within 30 days of the revision of any such SSM plan, when applicable. The Department requests submittal of such plans in electronic form, when possible.
- A.13. Roseburg shall comply with the requirements contained in Chapter 4 of the Missoula City-County Air Pollution Control Program (Chapter 32 of the State of Montana Air Quality Control Implementation Plan) with regard to emergency episodes.
- A.14. 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.15. 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.16. 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		Reporting Requirements
			Method	Frequency	
B.1, B.16, B.30, B.31, B.34, B.35, B.36	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	Semiannual
B.2, B.17, B.32, B.35, B.36	Line 1 Hours of Operation	8,500 Hours During any Rolling 12-Month Period	Recordkeeping	Ongoing	Semiannual
B.3, B.18, B.32, B.35, B.36	Line 2 Production	75 MMft <sup>2</sup> of ¾" Particle Board During any Rolling 12-Month Period	Recordkeeping	Ongoing	Semiannual
B.4, B.19, B.32, B.35, B.36	Control Equipment	Install, Operate, and Maintain	Recordkeeping	Monthly	Semiannual
B.5, B.20, B.32, B.35, B.36	Sander Dust Handling Systems	Enclosed and Equipped with a Baghouse	Recordkeeping	Monthly	Semiannual
B.6, B.21, B.32, B.35, B.36	Fugitive Emissions	Apply Paving or Dust Suppressant	Recordkeeping	Monthly	Semiannual
B.7, B.22, B.32, B.35, B.36	Contaminated Floor Sweepings	Not Stored Outside; Material stored in contaminated floor sweepings building limited to 50 units (370 cubic yards)	Recordkeeping	Monthly	Semiannual
B.8, B.23, B.32, B.35, B.36	Fugitive Emissions	Plant and Maintain Vegetation on Earthen Berm	Recordkeeping	Monthly	Semiannual
B.9, B.24, B.32, B.35, B.36	Total Particulate Emissions from the Raw Materials Storage Pile	928 lb/day and 30 ton/yr	Calculate Using Equation	Daily and Semiannual	Semiannual
B.10, B.24, B.32, B.35, B.36	PM <sub>10</sub> Emissions from the Raw Materials Storage Pile	334 lb/day and 9.9 ton/yr	Calculate Using Equation	Daily and Semiannual	Semiannual
B.11, B.25, B.32, B.35, B.36	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.12, B.26, B.32, B.35, B.36	Fugitive Emissions	Install and Maintain Enclosures with Curtained Openings on the Line 2 Fire Dump and the Line 2 Reject Dump	Recordkeeping	Monthly	Semiannual
B.13, B.27, B.32, B.35, B.36	Collection Efficiency of the Truck Dump Baghouse	Install and Maintain a Cover Over the Lift Portion of the Outside Truck Dump	Recordkeeping	Monthly	Semiannual
B.14, B.28, B.32, B.35, B.36	Fugitive Dust Emissions	Install and Maintain a Cover Over the Reclaim Hopper	Recordkeeping	Monthly	Semiannual
B.15, B.29, B.33, B.35, B.36	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

## 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. Line 1 shall be limited to a total of 8,500 hours of operation during any rolling 12-month period (ARM 17.8.749).
- B.3. Line 2 production shall be limited to 75-million square feet (MMft<sup>2</sup>) of ¾-inch particleboard during any rolling 12-month period (ARM 17.8.749).
- B.4. Roseburg shall install, operate, and maintain control equipment as specified in the application for Montana Air Quality Permit (MAQP) #2303-07 (ARM 17.8.749).
- B.5. All sander dust-handling systems are to be enclosed and equipped with baghouse control. No outside storage of sander dust shall be allowed (ARM 17.8.749).
- B.6. Paving or a dust suppressant shall be applied to all routinely used haul roads within the plant area. If a dust suppressant is used, it shall be reapplied at least once per year. Additional applications of dust suppressant may be required if fugitive dust exceeds 20% opacity at any time (ARM 17.8.308).
- B.7. 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<sup>3</sup>)) (ARM 17.8.749).
- B.8. Roseburg shall plant and maintain vegetation on the sides and trees along the top of the earthen berm constructed around the raw material pile to reduce dust emissions. Sufficient dust control measures shall be applied to the storage pile to ensure that the visible emissions from the storage pile do not exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.749).
- B.9. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 928-pounds per day (lb/day) daily maximum and 30 tons per year (TPY) for total particulate emissions (PM) (ARM 17.8.749).
- B.10. Fugitive particulate emissions from the raw material storage pile, including unloading, conveying to the pile, and transfer back to the mill, shall not exceed 334-lb/day daily maximum and 9.9 TPY for particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) (ARM 17.8.749).
- B.11. 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.12. Roseburg shall install and maintain enclosures with curtained openings on the Line 2 Fire Dump and the Line 2 Reject Dump to reduce fugitive emissions (ARM 17.8.749).
- B.13. Roseburg shall install and maintain a cover over the lift portion of the outside truck dump to increase the collection efficiency of the truck dump baghouse (ARM 17.8.749).
- B.14. Roseburg shall install and maintain a cover over the reclaim hopper to reduce fugitive dust emissions (ARM 17.8.749).

- B.15. By October 1, 2008, 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).

### **Compliance Demonstration**

- B.16. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the Emitting Unit for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of excessive emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the affected unit. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- B.17. Roseburg shall document, by month, the hours of operation of Line 1. By the 25<sup>th</sup> 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.18. Roseburg shall document, by month, the production of ¾-inch particleboard from Line 2. By the 25<sup>th</sup> day of each month, Roseburg shall total the production of ¾-inch particleboard from Line 2 during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.B.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).
- B.19. Roseburg shall monitor compliance with Section III.B.4 by documenting, monthly, that the control equipment specified in the application for MAQP #2303-07 is installed, operated, and maintained. The records shall include all repair and maintenance activity to the control equipment. 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.20. Roseburg shall monitor compliance with Section III.B.5 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.21. Roseburg shall monitor compliance with Section III.B.6 by documenting, monthly, all paving and dust suppressant applications conducted within the plant area, including the date actions were taken (ARM 17.8.1213).
- B.22. Roseburg shall monitor compliance with Section III.B.7 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 yd<sup>3</sup> at any one time (ARM 17.8.1213).
- B.23. Roseburg shall monitor compliance with Section III.B.8 by documenting, monthly, that vegetation has been planted and is being 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.24. Roseburg shall monitor compliance with Sections III.B.9 and III.B.10 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<sub>10</sub> emission factor of 0.36 pound per ton (lb/ton), or a PM emission factor of 1.0 lb/ton;
- n<sub>td</sub> = Control efficiency at the outdoor truck dump expressed as a ratio (i.e. 99% = 0.99);
- n<sub>rs</sub> = Control efficiency at the radial stacker expressed as a ratio; and
- n<sub>rp</sub> = Control efficiency at the pile reclaim expressed as a ratio.

Notes:

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

<u>Description</u>	<u>Control Efficiency</u>	<u>Controls</u>
Outdoor truck dump	99%	Covered surge bin and trailer lift with baghouse system
Pile reclaim	50%	Covered hopper and earthen berm
Radial stacker	50%	Reduced drop height and berm

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

- ii. Calculate the allowable emissions for the days when the inside truck dump is operated using the associated raw material delivery data and the constant of 0.50; and
  - iii. Add (i) and (ii) above.
- B.25. Roseburg shall monitor compliance with Section III.B.11 through recordkeeping as described in Section III.B.11 (ARM 17.8.1213).
- B.26. Roseburg shall monitor compliance with Section III.B.12 by documenting, monthly, that the enclosures with curtained openings have been installed and maintained on the Line 2 Fire Dump and the Line 2 Reject Dump. The Records shall include all maintenance activity conducted on the Line 2 Fire Dump and the Line 2 Reject 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.27. Roseburg shall monitor compliance with Section III.B.13 by documenting, monthly, that the cover over the lift portion of the outside truck dump has been installed and maintained to increase the collection efficiency of the truck dump baghouse. 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.28. Roseburg shall monitor compliance with Section III.B.14 by documenting, monthly, that the cover over the reclaim hopper has been installed and 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.29. Roseburg shall monitor compliance with Section III.B.15 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).

### **Recordkeeping**

- B.30. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- B.31. 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.32. Roseburg shall maintain the records required by Section III.B.11 and III.B.17 – III.B.28 on site and submit the information to the Department upon request (ARM 17.8.1212).
- B.33. Roseburg shall maintain 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).

## Reporting

- B.34. 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.35. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- B.36. 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, Subparts A and DDDD.

- C. EU002: #1 Dryer Line 1 with Natural Gas Back-Up Burner (DRY 100)**  
**EU003: #2 Dryer Line 1 with Natural Gas Back-Up Burner (DRY 101)**  
**EU004: #3 Dryer Line 1 with Natural Gas Back-Up Burner (DRY 102)**  
**EU005: #4 Dryer Line 1 with Natural Gas Back-Up Burner (DRY 103)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
C.1, C.10, C.16, C.17, C.20, C.21, C.22	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	Semiannual
C.2, C.3, C.11, C.17, C.20, C.21, C.22	Total Particulate Matter- DRY 100	4.9 lb/hr	Method 5	Every 5 Years	Semiannual
	Total Particulate Matter- DRY 101	4.7 lb/hr			
	Total Particulate Matter- DRY 102	4.9 lb/hr			
	Total Particulate Matter- DRY 103	4.9 lb/hr			
C.4, C.5, C.12, C.17, C.20, C.21, C.22	PM <sub>10</sub> - DRY 100	4.9 lb/hr	Method 201A	Every 5 Years	Semiannual
	PM <sub>10</sub> - DRY 101	4.7 lb/hr			
	PM <sub>10</sub> - DRY 102	4.9 lb/hr			
	PM <sub>10</sub> - DRY 103	4.9 lb/hr			
C.6, C.13, C.18, C.21, C.22	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.7, C.13, C.18, C.21, C.22	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.8, C.14, C.19, C.21, C.22	Particulate Emissions	Operate and Maintain Multiclones	Recordkeeping	Monthly	Semiannual
C.9, C.15, C.19, C.21, C.22	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	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. Emissions of total particulate matter from DRY100, DRY102, and DRY103 shall each be limited to a maximum of 4.9 pounds per hour (lb/hr) (ARM 17.8.749).
- C.3. Emissions of total particulate matter from DRY 101 shall be limited to a maximum of 4.7 lb/hr (ARM 17.8.749).
- C.4. Emissions of PM<sub>10</sub> from DRY100, DRY102, and DRY103 shall each be limited to a maximum of 4.9 lb/hr (ARM 17.8.749).
- C.5. Emissions of PM<sub>10</sub> from DRY101 shall be limited to a maximum of 4.7 lb/hr (ARM 17.8.749).

- C.6. 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.7. Roseburg shall operate the dry rotary dryers with a 24-hour block average inlet dryer temperature of less than or equal to 600 °F (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).
- C.8. Each dryer shall be equipped with multiclone control that is operated and maintained to meet the appropriate emission limit as specified in Sections III.C.2, III.C.3, III.C.4, and III.C.5 (ARM 17.8.752).
- C.9. Roseburg shall install and operate temperature sensors at the inlet of the 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 all three combustion units. The alarm system shall become activated when exhaust gas exceeds 1,100 degrees Fahrenheit (°F). Data from the temperature sensors shall be maintained for a period of at least 5 years and shall be available to the Department upon request (ARM 17.8.749).

### **Compliance Demonstration**

- C.10. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the combined stack emissions (which vents DRY100, DRY101, DRY102, and DRY103, and may vent BH200 and BH201) for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the combined stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- C.11. Roseburg shall monitor compliance with Sections III.C.2 and III.C.3 by conducting EPA Method 5 source testing on the combined stack emissions of DRY100, DRY101, DRY102, and DRY103 (and BH200 and BH201 if Roseburg chooses to vent the baghouses through the combined stack) to determine the total particulate matter emissions from the stack. The test results shall be used to monitor compliance with the sum total particulate matter mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The testing and compliance monitoring of the combined stack emissions shall take place at least once every 5 years, or according to another testing/monitoring schedule as may be approved by the Department. Source testing that is conducted without all sources vented to the combined stack will not relieve Roseburg of complying with the source testing frequency for each of those individual units not venting to the combined stack during the time of the test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual. The Department may require additional testing (ARM 17.8.1213).

- C.12. Roseburg shall monitor compliance with Sections III.C.4 and III.C.5 by conducting EPA Method 201A source testing on the combined stack emissions of DRY100, DRY101, DRY102, and DRY103 (and BH200 and BH201 if Roseburg chooses to vent the baghouses through the combined stack) to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> if the impinger analysis (“back-half”) is included. The test results shall be used to monitor compliance with the sum total PM<sub>10</sub> mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The testing and compliance monitoring of the combined stack emissions shall take place at least once every 5 years, or according to another testing/monitoring schedule as may be approved by the Department. Source testing that is conducted without all sources vented to the combined stack will not relieve Roseburg of complying with the source testing frequency for each of those individual units not venting to the combined stack during the time of the test. The source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual. The Department may require additional testing (ARM 17.8.1213).
- C.13. Roseburg shall monitor compliance with Section III.C.6 and III.C.7 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.14. Roseburg shall monitor compliance with Section III.C.8 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, III.C.3, III.C.4, and III.C.5. 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).
- C.15. Roseburg shall monitor compliance with Section III.C.9 by documenting, monthly, that the temperature sensors are installed and operated at the inlet of the dryers, that the temperature sensors have a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units, and that the alarm system is operational and programmed to activate if the dryer inlet temperature exceeds 1,100°F. The records shall include all repair and maintenance activity to the system. 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.16. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- C.17. 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.18. 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).
- C.19. Roseburg shall maintain the records required by Sections III.C.14 and III.C.15 on site and submit the information to the Department upon request (ARM 17.8.1212).

## Reporting

- C.20. 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.21. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- C.22. 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. EU006: #5 Dryer Line 2 with Natural Gas Back-Up Burner (DRY 200)  
EU007: #6 Dryer Line 2 with Natural Gas Back-Up Burner (DRY 201)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
D.1, D.9, D.16, D.17, D.20, D.21, D.22	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
D.2, D.10, D.17, D.20, D.21, D.22	Total Particulate Matter	6.0 lb/hr	Method 5	Every 5 Years	Semiannual
D.3, D.11, D.17, D.20, D.21, D.22	PM <sub>10</sub>	6.0 lb/hr	Method 201A	Every 5 Years	Semiannual
D.4, D.12, D.18, D.21, D.22	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
D.5, D.12, D.18, D.21, D.22	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
D.6, D.13, D.19, D.21, D.22	Particulate Emissions	Operate and Maintain Multiclones	Recordkeeping	Monthly	Semiannual
D.7, D.14, D.19, D.21, D.22	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	Recordkeeping	Monthly	Semiannual
D.8, D.15, D.19, D.21, D.22	Combined Production	168,000 BDT per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual

**Conditions**

- D.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.752).
- D.2. Emissions of total particulate matter from the Line 2 dryers shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- D.3. Emissions of PM<sub>10</sub> from the Line 2 dryers shall each be limited to a maximum of 6.0 lb/hr (ARM 17.8.749).
- D.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).
- D.5. Roseburg shall operate the dry rotary dryers with a 24-hour block average inlet dryer temperature of less than or equal to 600 °F (ARM 17.8.342 and 40 CFR 63, Subpart DDDD).
- D.6. Each dryer shall be equipped with multiclone control that is operated and maintained to meet the emission limits specified in Section III.D.2 and III.D.3 (ARM 17.8.752).

- D.7. Roseburg shall install and operate a temperature sensor at the inlet of each dryer. The temperature sensors shall have a remote readout and audible alarm. The alarm system shall be audible to the Line 2 Dryer operators. The alarm system shall become activated when exhaust gas exceeds 1,100°F. Data from the temperature sensors shall be maintained for a period of at least 5 years and shall be available to the Department upon request (ARM 17.8.749).
- D.8. The combined production from the two line 2 dryers shall not exceed 168,000 BDT per rolling 12-month period (ARM 17.8.749).

### **Compliance Demonstration**

- D.9. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of each of the Line 2 dryers for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from each of the Line 2 dryer stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- D.10. Roseburg shall monitor compliance with Section III.D.2 by conducting EPA Method 5 source testing on the stack emissions of each Line 2 dryer to determine the total particulate matter emissions from the stacks. 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.11. Roseburg shall monitor compliance with Section III.D.3 by conducting EPA Method 201A source testing on the stack emissions of each Line 2 dryer to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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.12. Roseburg shall monitor compliance with Section III.D.4 and III.D.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).

- D.13. Roseburg shall monitor compliance with Section III.D.6 by documenting, monthly, that the multiclones are operated and maintained on each dryer to meet the emission limits as specified in Section III.D.2 and III.D.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).
- D.14. Roseburg shall monitor compliance with Section III.D.7 by documenting, monthly, that the temperature sensors are installed and operated at the inlet of the dryers, that the temperature sensors have a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units, and that the alarm system is operational and programmed to activate if the dryer inlet temperature exceeds 1,100°F. The records shall include all repair and maintenance activity to the system. 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.15. Roseburg shall document, by month, the production of the two Line 2 dryers. By the 25<sup>th</sup> day of each month, Roseburg shall total the hours of operation of the two Line 2 dryers during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.D.8. 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).

### **Recordkeeping**

- D.16. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- D.17. 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.18. 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).
- D.19. Roseburg shall maintain the records required by Section III.D.13, III.D.14, and III.D.15 on site and submit the information to the Department upon request (ARM 17.8.1212).

### **Reporting**

- D.20. 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.21. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- D.22. 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.

**E. EU008: Predryer (DRY 500)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
E.1, E.8, E.15, E.16, E.19, E.20, E.21	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
E.2, E.9, E.16, E.19, E.20, E.21	Total Particulate Matter	6.21 lb/hr	Method 5	Every 5 years	Semiannual
E.3, E.10, E.16, E.19, E.20, E.21	PM <sub>10</sub>	6.21 lb/hr	Method 201A	Every 5 years	Semiannual
E.4, E.11, E.17, E.20, E.21	Particulate Emissions	Operate and Maintain Medium Efficiency Cyclone and WESP	Recordkeeping	Monthly	Semiannual
E.5, E.12, E.17, E.20, E.21	Temperature Sensors with Remote Readout and Audible Alarm	Install and Operate	Recordkeeping	Monthly	Semiannual
E.6, E.13, E.17, E.20, E.21	Production	200,000 BDT per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
E.7, E.14, E.18, E.20, E.21	PM <sub>10</sub> CAM Plan	CAM Plan Appendix E	CAM Plan Appendix E	Ongoing	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 17.8.752).
- E.2. Emissions of total particulate matter from the predryer shall be limited to a maximum of 6.21 lb/hr (ARM 17.8.749).
- E.3. Emissions of PM<sub>10</sub> from the predryer shall be limited to a maximum of 6.21 lb/hr (ARM 17.8.749).
- E.4. The predryer shall be equipped with a medium efficiency cyclone and a wet electrostatic precipitator (WESP) that is operated and maintained to meet the emission limits specified in Section III.E.1, III.E.2 and III.E.3 (ARM 17.8.752).
- E.5. Roseburg shall install and operate a temperature sensor at the inlet of the predryer. The temperature sensor shall have a remote readout and audible alarm. The alarm system shall be audible to the dryer operator and the operator(s) of all three combustion units. The alarm system shall become activated when exhaust gas exceeds 1,100°F. Data from the temperature sensors shall be maintained for a period of at least 5 years and shall be available to the Department upon request (ARM 17.8.749).

- E.6. Production from the predryer shall not exceed 200,000 BDT per any rolling 12-month time period (ARM 17.8.749).
- E.7. 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**

- E.8. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the RTO stack (See Section III.BB for requirements specific to the RTO) for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the RTO (See Section III.BB for requirements specific to the RTO). 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- E.9. Roseburg shall monitor compliance with Section III.E.2 by conducting EPA Method 5 source testing on the stack emissions of the predryer to determine the total particulate matter emissions from the stacks. 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).
- E.10. Roseburg shall monitor compliance with Section III.E.3 by conducting EPA Method 201A source testing on the stack emissions of the predryer to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- E.11. Roseburg shall monitor compliance with Section III.E.4 by documenting, monthly, that the medium efficiency cyclone is operated and maintained on the predryer to meet the emission limits as specified in Section III.E.2 and III.E.3. The records shall include all repair and maintenance activity to the cyclone. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).

- E.12. Roseburg shall monitor compliance with Section III.E.5 by documenting, monthly, that the temperature sensor is installed and operated at the inlet of the predryer, that the temperature sensor has a remote readout and audible alarm that is audible to the dryer operator and the operator(s) of all three combustion units, and that the alarm system is operational and programmed to activate if the predryer inlet temperature exceeds 1,100°F. The records shall include all repair and maintenance activity to the system. The records must include, but are not limited to, the date, time, and action(s) taken for repair and maintenance (ARM 17.8.1213).
- E.13. Roseburg shall document, by month, the production of the predryer. By the 25<sup>th</sup> 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.E.6. 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).
- E.14. Roseburg shall monitor compliance with Section III.E.4 and III.E.7 by monitoring emissions according to the CAM Plan contained in Appendix E of this permit (ARM 17.8.1503 and ARM 17.8.1213).

### **Recordkeeping**

- E.15. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- E.16. 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).
- E.17. Roseburg shall maintain the records required by Section III.E.11, III.E.12 and III.E.13 on site and submit the information to the Department upon request (ARM 17.8.1212).
- E.18. 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).

### **Reporting**

- E.19. 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.20. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- E.21. 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.

## F. EU010: Outside Truck Dump (BH 50)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
F.1, F.5, F.9, F.10, F.11, F.12, F.13	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
F.2, F.6, F.10, F.11, F.12, F.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
F.3, F.7, F.10, F.11, F.12, F.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
F.4, F.8, F.10, F.11, F.12, F.13	Flow Rate	27,470 dcfm	Method 2	As Required by the Department and Section III.A.1	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 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).
- F.3. Emissions of PM<sub>10</sub> from the outside truck dump baghouse shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- F.4. The flowrate through BH50 shall not exceed 27,470 dry cubic feet per minute (dcfm) (ARM 17.8.749).

### Compliance Demonstration

- F.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of the outside truck dump for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the outside truck dump stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- F.6. Roseburg shall monitor compliance with Section III.F.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).
- F.7. Roseburg shall monitor compliance with Section III.F.3 by conducting EPA Method 201A source testing on the stack emissions of the outside truck dump to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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.8. Roseburg shall monitor compliance with Section III.F.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**

- F.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- F.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**

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

F.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.

**G. EU011: Milling and Drying (BH 55)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
G.1, G.6, G.11, G.12, G.14, G.15, G.16	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
G.2, G.7, G.12, G.14, G.15, G.16	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
G.3, G.8, G.12, G.14, G.15, G.16	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
G.4, G.9, G.12, G.14, G.15, G.16	Flow Rate	32,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual
G.5, G.10, G.13, G.15, G.16	Baghouse	Install, operate, and maintain	Recordkeeping	Monthly	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 BH 55 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- G.3. Emissions of PM<sub>10</sub> from BH 55 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- G.4. The flowrate through BH 55 shall not exceed 32,000 dcfm (ARM 17.8.749).
- G.5. Roseburg shall install, operate, and maintain a baghouse to control emissions from the three dryer loop vents and the coarse refiner loop vent in Milling and Drying (ARM 17.8.749).

**Compliance Demonstration**

- G.6. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 55 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall

immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the milling and drying stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- G.7. Roseburg shall monitor compliance with Section III.G.2 by conducting EPA Method 5 source testing on the stack emissions of BH 55 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.8. Roseburg shall monitor compliance with Section III.G.3 by conducting EPA Method 201A source testing on the stack emissions of BH 55 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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.9. Roseburg shall monitor compliance with Section III.G.4 by conducting EPA Method 2 Source Testing on the stack of BH 55 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).
- G.10. Roseburg shall monitor compliance with Section III.G.5 by documenting, monthly, that the baghouse was operated and maintained on the three dryer loop vents and the coarse refiner loop vent in Milling and Drying. The records shall include all repair and maintenance activity to the 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**

- G.11. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- G.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).

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

**Reporting**

G.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).

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

G.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.

**H. EU012: Reject System Line 1 (BH 100)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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 <sub>10</sub>	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	40,000 dcfm	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 BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

H.3. Emissions of PM<sub>10</sub> from BH100 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).

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

## Compliance Demonstration

H.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 100 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 100 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 100 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).

H.7. Roseburg shall monitor compliance with Section III.H.3 by conducting EPA Method 201A source testing on the stack emissions of BH 100 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).

H.8. Roseburg shall monitor compliance with Section III.H.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

H.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU013: Reject System Relay Line 1 (BH 101)  
EU046: Predry (BH 60)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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 <sub>10</sub>	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	3,000 dcfm	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 101 and BH 60 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- I.3. Emissions of PM<sub>10</sub> from BH 101 and BH 60 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- I.4. The flowrate through BH 101 and BH 60 shall each not exceed 3,000 dcfm (ARM 17.8.749).

## Compliance Demonstration

- I.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 101 and BH 60 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 101 and BH 60 stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 and BH 60 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).
- 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 and BH 60 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).

I.8. Roseburg shall monitor compliance with Section III.I.4 by conducting EPA Method 2 Source Testing on the stack of BH 101 and BH 60 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**

I.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU014: 5 X 25 Board Trimsaws System Line 1 (BH 102)  
EU015: 5 X 16 Board Trimsaws System (BH 103)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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 <sub>10</sub>	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	28,800 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 BH102 and BH103 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- J.3. Emissions of PM<sub>10</sub> from BH102 and BH103 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- J.4. The flowrate through BH102 and BH103 shall each not exceed 28,800 dcfm (ARM 17.8.749).

## Compliance Demonstration

- J.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 102 and BH 103 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 102 and BH 103 stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 102 and BH 103 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 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 102 and BH 103 to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).

- J.8. Roseburg shall monitor compliance with Section III.J.4 by conducting EPA Method 2 Source Testing on the stacks of BH 102 and BH 103 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**

- J.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU016: Core Air System Line 2 (BH 201)**  
**EU017: Face Air System Line 2 (BH 200)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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 <sub>10</sub>	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	26,680 dcfm	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 200 and BH 201 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- K.3. Emissions of PM<sub>10</sub> from BH 200 and BH 201 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- K.4. The flowrate through BH200 and BH201 shall each not exceed 26,680 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- K.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 200 and BH 201 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 200 and BH 201 stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 200 and BH 201 to determine the total particulate matter emissions from the stacks. If the source test is conducted while BH200 and BH201 are vented through the combined stack in conjunction with DRY100, DRY101, DRY102, and DRY103 (see Section III.C), the test results shall be used to monitor compliance with the sum total particulate mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The 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 200 and BH 201 to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> if the impinger analysis (“back-half”) is included. If the source test is conducted while BH200 and BH201 are vented through the combined stack in conjunction with DRY100, DRY101, DRY102, and DRY103 (see Section III.C), the test results shall be used to monitor compliance with the sum total particulate mass emission limits of all of the operating sources vented to the stack at the time of the compliance source test. The testing and compliance monitoring of 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 200 and BH 201 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 weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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.

## Alternative Operating Scenario

In any circumstances where Roseburg is unable to demonstrate compliance with the emission limits identified in Section III.K, Roseburg may, at its discretion, disconnect the combined stack to isolate the individual emission sources and identify the source of the emissions leading to the exceedance. In such circumstances, Roseburg shall correct the problems and re-attach the stack within no more than 60 days after discovering the exceedance. However, if Roseburg determines, and the Department agrees, that it is the combined stack itself that is causing or contributing to the exceedance, Roseburg shall leave the combined stack unattached, thus venting each source as originally designed. Roseburg will then have 60 days to submit to the Department for approval another alternative to address this issue. Roseburg will not be required to vent those sources to the combined stack if such venting would result in, or risk resulting in, a violation of any permit term or condition. This alternative operating scenario is meant to allow for Roseburg to isolate any source that may be responsible for an exceedance of a permit condition. This alternative operating scenario does not relieve Roseburg of the liability for a violation of the emission limits identified in Section III.K (ARM 17.8.1212).

## L. EU018: Mat Trim System Line 2 (BH 202) EU019: Board Trim System Line 2 (BH 203)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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)	Semiannual
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 <sub>10</sub>	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	30,000 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 BH202 and BH203 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- L.3. Emissions of PM<sub>10</sub> from BH202 and BH203 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- L.4. The flowrate through BH202 and BH203 shall each not exceed 30,000 dcfm (ARM 17.8.749).

## Compliance Demonstration

- L.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 202 and BH 203 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 202 and BH 203 stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 202 and BH 203 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).
- L.7. Roseburg shall monitor compliance with Section III.L.3 by conducting EPA Method 201A source testing on the stack emissions of BH 202 and BH 203 to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).

- L.8. Roseburg shall monitor compliance with Section III.L.4 by conducting EPA Method 2 Source Testing on the stacks of BH 202 and BH 203 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**

- L.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU020: Board & Trim System Line 2 Relay (BH 204)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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 <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
M.4, M.8, M.10, M.11, M.12, M.13	Flow Rate	8,000 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 204 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- M.3. Emissions of PM<sub>10</sub> from BH 204 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- M.4. The flowrate through BH 204 shall not exceed 8,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- M.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 204 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 204 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 204 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 204 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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 204 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 weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU021: Six Head Sander (BH 300A & BH 300B)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
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)	
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 <sub>10</sub>	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	26,000 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 BH 300A and BH 300B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- N.3. Emissions of PM<sub>10</sub> from BH 300A and BH 300B shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- N.4. The flowrate through BH 300A and BH 300B shall each not exceed 26,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- N.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 300A and BH 300B for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 300A and BH 300B stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and 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 300A and BH 300B 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).
- N.7. Roseburg shall monitor compliance with Section III.N.3 by conducting EPA Method 201A source testing on the stack emissions of BH 300A and BH 300B to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- N.8. Roseburg shall monitor compliance with Section III.N.4 by conducting EPA Method 2 Source Testing on the stacks of BH 300A and BH 300B 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**

- N.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (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. EU023: Six Head and Reman Flatline Relay (BH 301)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
O.1, O.5, O.9, O.10, O.11, O.12, O.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
O.2, O.6, O.10, O.11, O.12, O.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
O.3, O.7, O.10, O.11, O.12, O.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
O.4, O.8, O.10, O.11 O.12, O.13	Flow Rate	4,000 dcfm	Method 2	As Required by the Department and Section III.A.1	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. Emissions of Total Particulate from BH 301 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- O.3. Emissions of PM<sub>10</sub> from BH 301 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- O.4. The flowrate through BH301 shall not exceed 4,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- O.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 301 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9. If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 301 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- O.6. Roseburg shall monitor compliance with Section III.O.2 by conducting EPA Method 5 source testing on the stack emissions of BH 301 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).
- O.7. Roseburg shall monitor compliance with Section III.O.3 by conducting EPA Method 201A source testing on the stack emissions of BH 301 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- O.8. Roseburg shall monitor compliance with Section III.O.4 by conducting EPA Method 2 Source Testing on the stack of BH 301 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**

- O.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- O.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**

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

**P. EU024: Eight Head Sander (BH 302 & BH 303)**

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

**Conditions**

- P.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- P.2. Emissions of Total Particulate from BH 302 and BH 303 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- P.3. Emissions of PM<sub>10</sub> from BH 302 and BH 303 shall each not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- P.4. The flowrate through BH 302 and BH 303 shall each not exceed 47,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- P.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stacks of BH 302 and BH 303 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 302 and BH 303 stacks. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- P.6. Roseburg shall monitor compliance with Section III.P.2 by conducting EPA Method 5 source testing on the stack emissions of BH 302 and BH 303 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).
- P.7. Roseburg shall monitor compliance with Section III.P.3 by conducting EPA Method 201A source testing on the stack emissions of BH 302 and BH 303 to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- P.8. Roseburg shall monitor compliance with Section III.P.4 by conducting EPA Method 2 Source Testing on the stacks of BH 302 and BH 303 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**

- P.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- P.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**

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

**Q. EU026: Eight Head Sander Relay (BH 304)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
Q.1, Q.5, Q.9, Q.10, Q.11, Q.12, Q.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
Q.2, Q.6, Q.10, Q.11, Q.12, Q.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
Q.3, Q.7, Q.10, Q.11, Q.12, Q.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
Q.4, Q.8, Q.10, Q.11, Q.12, Q.13	Flow Rate	10,000 dcfm	Method 2	As Required by the Department and Section III.A.1	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. Emissions of Total Particulate from BH 304 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- Q.3. Emissions of PM<sub>10</sub> from BH 304 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- Q.4. The flowrate through BH 304 shall not exceed 10,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- Q.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 304 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 304 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- Q.6. Roseburg shall monitor compliance with Section III.Q.2 by conducting EPA Method 5 source testing on the stack emissions of BH 304 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.7. Roseburg shall monitor compliance with Section III.Q.3 by conducting EPA Method 201A source testing on the stack emissions of BH 304 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- Q.8. Roseburg shall monitor compliance with Section III.Q.4 by conducting EPA Method 2 Source Testing on the stack of BH 304 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**

- Q.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- Q.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**

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

**R. EU027: Reman Flat Line Sander Relay (BH 400)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
R.1, R.5, R.9, R.10, R.11, R.12, R.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
R.2, R.6, R.10, R.11, R.12, R.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
R.3, R.7, R.10, R.11, R.12, R.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
R.4, R.8, R.10, R.11, R.12, R.13	Flow Rate	20,000 dcfm	Method 2	As Required by the Department and Section III.A.1	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. Emissions of Total Particulate from BH 400 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- R.3. Emissions of PM<sub>10</sub> from BH 400 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- R.4. The flowrate through BH 400 shall not exceed 20,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- R.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 400 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 400 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- R.6. Roseburg shall monitor compliance with Section III.R.2 by conducting EPA Method 5 source testing on the stack emissions of BH 400 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.7. Roseburg shall monitor compliance with Section III.R.3 by conducting EPA Method 201A source testing on the stack emissions of BH 400 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- R.8. Roseburg shall monitor compliance with Section III.R.4 by conducting EPA Method 2 Source Testing on the stack of BH 400 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**

- R.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- R.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**

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

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

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
S.1, S.5, S.9, S.10, S.11, S.12, S.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
S.2, S.6, S.10, S.11 S.12, S.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
S.3, S.7, S.10, S.11, S.12, S.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
S.4, S.8, S.10, S.11, S.12, S.13	Flow Rate	27,000 dcfm	Method 2	As Required by the Department and Section III.A.1	Semiannual

**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)).
- S.2. Emissions of Total Particulate from BH 401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- S.3. Emissions of PM<sub>10</sub> from BH 401 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- S.4. The flowrate through BH401 shall not exceed 27,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- S.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 401 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 401 stack. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- S.6. Roseburg shall monitor compliance with Section III.S.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).
- S.7. Roseburg shall monitor compliance with Section III.S.3 by conducting EPA Method 201A source testing on the stack emissions of BH 401 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- S.8. Roseburg shall monitor compliance with Section III.S.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**

- S.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- S.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**

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

**T. EU029: Schilling and Bullnose System Relay & Edge Bander Line (BH 404)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
T.1, T.5, T.9, T.10, T.11, T.12, T.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
T.2, T.6, T.10, T.11, T.12, T.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
T.3, T.7, T.10, T.11, T.12, T.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
T.4, T.8, T.10, T.11, T.12, T.13	Flow Rate	1,700 dcfm	Method 2	As Required by the Department and Section III.A.1	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 BH 404 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- T.3. Emissions of PM<sub>10</sub> from BH 404 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- T.4 The flowrate through BH404 shall not exceed 1,700 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- T.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 404 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 404 stack. 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

meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- T.6. Roseburg shall monitor compliance with Section III.T.2 by conducting EPA Method 5 source testing on the stack emissions of BH 404 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).
- T.7. Roseburg shall monitor compliance with Section III.T.3 by conducting EPA Method 201A source testing on the stack emissions of BH 404 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- T.8. Roseburg shall monitor compliance with Section III.T.4 by conducting EPA Method 2 Source Testing on the stack of BH 404 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**

- T.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- T.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**

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

**U. EU055: Melamine Baghouse (BH500)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
U.1, U.5, U.9, U.10, U.11, U.12, U.13	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
U.2, U.6, U.10, U.11, U.12, U.13	Total Particulate	0.005 gr/dscf	Method 5	As Required by the Department and Section III.A.1	Semiannual
U.3, U.7, U.10, U.11, U.12, U.13	PM <sub>10</sub>	0.005 gr/dscf	Method 201A	As Required by the Department and Section III.A.1	Semiannual
U.4, U.8, U.10, U.11, U.12, U.13	Flow Rate	21,000 dcfm	Method 2	As Required by the Department and Section III.A.1	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 17.8.304(2)).
- U.2. Emissions of Total Particulate from BH500 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- U.3. Emissions of PM<sub>10</sub> from BH500 shall not exceed 0.005 gr/dscf of exhaust gas (ARM 17.8.749).
- U.4. The flowrate through BH500 shall not exceed 21,000 dcfm (ARM 17.8.749).

**Compliance Demonstration**

- U.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the stack of BH 500 for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the BH 500 stack. 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

meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- U.6. Roseburg shall monitor compliance with Section III.U.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).
- U.7. Roseburg shall monitor compliance with Section III.U.3 by conducting EPA Method 201A source testing on the stack emissions of BH 500 to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- U.8. Roseburg shall monitor compliance with Section III.U.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**

- U.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- U.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**

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

**V. EU030: Press Vents 1, 2, 3, 4 Line 1 (PRESS 100)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
V.1, V.6, V.10, V.11, V.13, V.14, V.15	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
V.2, V.7, V.11, V.13, V.14, V.15	Total Particulate	8.0 lb/hr for all four stacks combined	Method 5	As Required by the Department and Section III.A.1	Semiannual
V.3, V.8, V.11, V.13, V.14, V.15	PM <sub>10</sub>	8.0 lb/hr for all four stacks combined	Method 201A	As Required by the Department and Section III.A.1	Semiannual
V.4, V.9, V.12, V.14, V.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
V.5, V.9, V.12, V.14, V.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**

- V.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- V.2. Press Vents 1, 2, 3, and 4 on Line 1 shall be limited to 8.0 lb/hr of total particulate emissions for all four stacks combined (ARM 17.8.749).
- V.3. Press Vents 1, 2, 3, and 4 on Line 1 shall be limited to 8.0 lb/hr of PM<sub>10</sub> emissions for all four stacks combined (ARM 17.8.749).
- V.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).
- V.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**

- V.6. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the Biofilter for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the

visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the Biofilter. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- V.7. Roseburg shall monitor compliance with Section III.V.2 by conducting EPA Method 5 source testing on the press vents 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).
- V.8. Roseburg shall monitor compliance with Section III.V.3 by conducting EPA Method 201A source testing on the press vents to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- V.9. Roseburg shall monitor compliance with Section III.V.4 and III.V.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**

- V.10. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- V.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).
- V.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

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

**W. EU0031: Press Vents 1, 2, 3, & 4 Line 2 (PRESS 200)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
W.1, W.6, W.10, W.11, W.13, W.14, W.15	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
W.2, W.7, W.11, W.13, W.14, W.15	Total Particulate	6.5 lb/hr for all four stacks combined	Method 5	As Required by the Department and Section III.A.1	Semiannual
W.3, W.8, W.11, W.13, W.14, W.15	PM <sub>10</sub>	6.5 lb/hr for all four stacks combined	Method 201A	As Required by the Department and Section III.A.1	Semiannual
W.4, W.9, W.12, W.14, W.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
W.5, W.9, W.12, W.14, W.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**

- W.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)).
- W.2. Press Vents 1, 2, 3, and 4 on Line 2 shall be limited to 6.5 lb/hr of total particulate emissions for all four stacks combined (ARM 17.8.749).
- W.3. Press Vents 1, 2, 3, and 4 on Line 2 shall be limited to 6.5 lb/hr of PM<sub>10</sub> emissions for all four stacks combined (ARM 17.8.749).
- W.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).
- W.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**

- W.6. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the Biofilter for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the

visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the Biofilter. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- W.7. Roseburg shall monitor compliance with Section III.W.2 by conducting EPA Method 5 source testing on the press vents 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).
- W.8. Roseburg shall monitor compliance with Section III.W.3 by conducting EPA Method 201A source testing on the press vents to determine the PM<sub>10</sub> emissions from the stacks. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).
- W.9. Roseburg shall monitor compliance with Section III.W.4 and III.W.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**

- W.10. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- W.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).
- W.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

- W.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).
- W.14. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- W.15. The semiannual monitoring report shall provide (ARM 17.8.1212):
- A summary of the results of any compliance test conducted during the last reporting period;
  - If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log;
  - Certification of compliance with 40 CFR 63, Subpart DDDD.

## X. EU032: Boiler #1 (BOILER 1)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
X.1, X.6, X.11, X.12, X.14, X.15, X.16	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
X.2, X.7, X.12, X.14, X.15, X.16	Total Particulate	19.8 lb/hr	Method 5	As Required by the Department and Section III.A.1	Semiannual
X.3, X.8, X.12, X.14, X.15, X.16	PM <sub>10</sub>	19.8 lb/hr	Method 201A	As Required by the Department and Section III.A.1	Semiannual
X.4, X.9, X.13, X.15, X.16	Electric Eye Monitor	Installed in Ash Separator Junction of the Sander Dust Boiler Stack	Recordkeeping	Monthly	Semiannual
X.5, X.10, X.13, X.15, X.16	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

## Conditions

- X.1. Roseburg shall not cause or authorize to be discharged into the outdoor atmosphere, from the sander dust abort stack, any visible emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- X.2. Particulate emissions from the sander dust boiler shall not exceed 19.8 lb/hr of total particulate when venting from the sander dust boiler abort stack (ARM 17.8.749).
- X.3. Particulate emissions from the sander dust boiler shall not exceed 19.8 lb/hr of PM<sub>10</sub> when venting from the sander dust boiler abort stack (ARM 17.8.749).

- X.4. An electric eye monitor, similar to those used in incinerators, shall be installed in the ash separator junction of the sander dust boiler stack. This location may not be a direct indicator of stack opacity, but shall be used to alert the boiler operator to possible upset conditions. The monitor shall have a remote readout visible or audible to the operator of the boiler. Roseburg shall immediately initiate corrective action whenever emissions to atmosphere in excess of 20% opacity are observed from the sander dust boiler stack. Data from the monitor need not be recorded and digitized unless the Department has reason to believe a violation of the opacity standard exists and requests that Roseburg record and maintain the data (ARM 17.8.749).
- X.5. The Department reserves the right to require opacity monitors at the sander dust boiler 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**

- X.6. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the boiler for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the boiler. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- X.7. Roseburg shall monitor compliance with Section III.X.2 by conducting EPA Method 5 source testing on the boiler 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).
- X.8. Roseburg shall monitor compliance with Section III.X.3 by conducting EPA Method 201A source testing on the boiler to determine the PM<sub>10</sub> emissions from the stack. Method 5 results may be used as a surrogate for PM<sub>10</sub> 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).

- X.9. Roseburg shall monitor compliance with Section III.X.4 by documenting, monthly, that the electric eye monitor is installed in the ash separator junction of the sander dust boiler stack, that the monitor has a remote readout visible or audible to the operator of the boiler, and that corrective action was immediately taken whenever emissions to atmosphere exceeding 20% opacity are observed from the sander dust boiler stack. The records must include, but are not limited to, the date and time of any corrective actions taken (ARM 17.8.1213).
- X.10. 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.X.5 (ARM 17.8.1213).

### **Recordkeeping**

- X.11. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- X.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).
- X.13. Roseburg shall maintain the records required by Section III.X.9, and III.X.10 on site and submit the information to the Department upon request (ARM 17.8.1212).

### **Reporting**

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

## Y. EU033: Roemmc Burner (ROEMMC)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
Y.1, Y.8, Y.14, Y.15, Y.17, Y.18, Y.19	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
Y.2, Y.9, Y.15, Y.17, Y.18, Y.19	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department and Section III.A.1	Semiannual
Y.3, Y.10, Y.16, Y.18, Y.19	Sander Dust Combustion	23,000 Tons per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
Y.4, Y.11, Y.15, Y.17, Y.18, Y.19	NO <sub>x</sub>	115.0 lb/hr	Method 7E	Every 5 Years	Semiannual
Y.5, Y.11, Y.15, Y.17, Y.18, Y.19	CO	100.0 lb/hr	Method 10	Every 5 Years	Semiannual
Y.6, Y.12, Y.15, Y.17, Y.18, Y.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
Y.7, Y.13, Y.16, Y.18, Y.19	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

### Conditions

- Y.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- Y.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of  $E = 1.026 * H^{-0.233}$  for new fuel-burning equipment, where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lb/MMBtu (ARM 17.8.309).
- Y.3. Roseburg shall not combust more than 23,000 tons of sander dust in the Roemmc Burner during any rolling 12-month time period (ARM 17.8.749).
- Y.4. Emissions of NO<sub>x</sub> from the Roemmc Burner shall not exceed 115.0 lb/hr (ARM 17.8.749 and ARM 17.8.752).
- Y.5. Emissions of CO from the Roemmc Burner shall not exceed 100.0 lb/hr (ARM 17.8.749 and ARM 17.8.752).
- Y.6. Emissions of VOCs from the Roemmc Burner shall not exceed 0.35 lb/hr (ARM 17.8.749 and ARM 17.8.752).

- Y.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**

- Y.8. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the burner for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the burner. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- Y.9. Roseburg shall monitor compliance with Section III.Y.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).
- Y.10. Roseburg shall document, by month, the amount of sander dust combusted in the Roemmc Burner. By the 25<sup>th</sup> 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.Y.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).
- Y.11. Roseburg shall monitor compliance with Sections III.Y.4 and III.Y.5 by conducting EPA Methods 7E and 10 source testing on the Roemmc Burner emissions for NO<sub>x</sub> 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).

- Y.12. Roseburg shall monitor compliance with Section III.Y.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).
- Y.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.Y.7 (ARM 17.8.1213).

### **Recordkeeping**

- Y.14. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- Y.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).
- Y.16. Roseburg shall maintain the records required by Section III.Y.10, and III.Y.13 on site and submit the information to the Department upon request (ARM 17.8.1212).

### **Reporting**

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

## Z. EU047: Solagen Burner (SOLAGEN)

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
Z.1, Z.9, Z.16, Z.17, Z.19, Z.20, Z.21	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
Z.2, Z.10, Z.17, Z.19, Z.20, Z.21	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department and Section III.A.1	Semiannual
Z.3, Z.11, Z.18, Z.20, Z.21	Sander Dust Combustion	26,280 Tons per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
Z.4, Z.12, Z.18, Z.20, Z.21	Natural Gas Combustion	352.1 MMscf per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
Z.5, Z.13, Z.17, Z.19, Z.20, Z.21	NO <sub>x</sub>	31.5 lb/hr	Method 7E	Every 2 Years	Semiannual
Z.6, Z.13, Z.17, Z.19, Z.20, Z.21	CO	15.6 lb/hr	Method 10	Every 2 Years	Semiannual
Z.7, Z.14, Z.17, Z.19, Z.20, Z.21	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
Z.8, Z.15, Z.18, Z.20, Z.21	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

### Conditions

- Z.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- Z.2. Roseburg shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of  $E = 1.026 * H^{-0.233}$  for new fuel-burning equipment, where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lb/MMBtu (ARM 17.8.309).
- Z.3. Roseburg shall not combust more than 26,280 tons of sander dust in the Solagen Burner during any rolling 12-month time period (ARM 17.8.749).
- Z.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).
- Z.5. Emissions of NO<sub>x</sub> from the Solagen Burner shall not exceed 31.5 lb/hr (ARM 17.8.749).
- Z.6. Emissions of CO from the Solagen Burner shall not exceed 15.6 lb/hr (ARM 17.8.749).
- Z.7. Emissions of VOCs from the Solagen Burner shall not exceed 0.09 lb/hr (ARM 17.8.749).

- Z.8. 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**

- Z.9. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the burner for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the burner. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- Z.10. Roseburg shall monitor compliance with Section III.Z.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).
- Z.11. Roseburg shall document, by month, the amount of sander dust combusted in the Solagen Burner. By the 25<sup>th</sup> 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.Z.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).
- Z.12. Roseburg shall document, by month, the amount of natural gas combusted in the Solagen Burner. By the 25<sup>th</sup> 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.Z.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).
- Z.13. Roseburg shall monitor compliance with Sections III.Z.5 and III.Z.6 by conducting EPA Methods 7E and 10 source testing on the Solagen Burner emissions for NO<sub>x</sub> 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).

- Z.14. Roseburg shall monitor compliance with Section III.Z.7 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).
- Z.15. 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.Z.8 (ARM 17.8.1213).

### **Recordkeeping**

- Z.16. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- Z.17. 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).
- Z.18. Roseburg shall maintain the records required by Section III.Z.11, III.Z.12, and III.Z.15 on site and submit the information to the Department upon request (ARM 17.8.1212).

### **Reporting**

- Z.19. 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).
- Z.20. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- Z.21. 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.

**AA. EU035: Line 2 Oil Heater (GEKA)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
AA.1, AA.5, AA.9, AA.10, AA.12, AA.13, AA.14	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
AA.2, AA.6, AA.10, AA.12, AA.13, AA.14	Particulate From Fuel Combustion	$E = 1.026 * H^{-0.233}$	Method 5	As Required by the Department and Section III.A.1	Semiannual
AA.3, AA.7, AA.11, AA.13, AA.14	Natural Gas Combustion	166.9 MMscf During any Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
AA.4, AA.8, AA.11, AA.13, AA.14	Opacity Monitor	Install and Operate (as required)	Recordkeeping (if required to install)	Monthly	Semiannual

**Conditions**

- AA.1. Roseburg shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304(2)).
- AA.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).
- AA.3. Roseburg shall not combust more than 166.9 MMscf of natural gas in the oil heater during any rolling 12-month time period (ARM 17.8.749).
- AA.4. The Department reserves the right to require opacity monitors at the hot oil heater stack. The decision to require this monitoring shall be based upon whether or not the Department has reason to believe a violation of the opacity standard exists. If excess emissions exist or may exist at these locations, further opacity monitoring may be required (ARM 17.8.749).

**Compliance Demonstration**

- AA.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the hot oil heater for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the hot oil heater. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- AA.6. Roseburg shall monitor compliance with Section III.AA.2 by conducting EPA Method 5 source testing on the hot oil heater 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).
- AA.7. Roseburg shall document, by month, the amount of natural gas combusted in the hot oil heater. By the 25<sup>th</sup> day of each month, Roseburg shall total the amount of natural gas combusted in the hot oil heater during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.AA.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).
- AA.8. If opacity monitors are required by the Department at the hot oil heater stack, Roseburg shall document, monthly, that the opacity monitors were installed and operating to monitor compliance with Section III.AA.4 (ARM 17.8.1213).

### **Recordkeeping**

- AA.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- AA.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).
- AA.11. Roseburg shall maintain the records required by Section III.AA.7 and III.AA.8 on site and submit the information to the Department upon request (ARM 17.8.1212).

### **Reporting**

- AA.12. 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).
- AA.13. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

AA.14. 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.

**BB. EU056: Regenerative Thermal Oxidizer**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
BB.1, BB.6, BB.11, BB.12, BB.15, BB.16, BB.17	Opacity	10%	Visual Surveys	Weekly	Semiannual
			Method 9	Within 180 days of actual start-up; Semiannual	
BB.2, BB.7, BB.13, BB.16, BB.17	RTO	Install, Operate, and Maintain	Recordkeeping	Monthly	Semiannual
BB.3, BB.8, BB.12, BB.15, BB.16, BB.17	Particulate Matter	0.10 gr/dscf	Method 5	Within 180 days of actual start-up; Thereafter, As Required by the Department and Section III.A.1	Semiannual
BB.4, BB.9, BB.13, BB.16, BB.17	Opacity Monitor	Install and Operate (if required)	Recordkeeping (if required to install)	Monthly	Semiannual
BB.5, BB.10, BB.14, BB.16, BB.17	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

**Conditions**

- BB.1. 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).
- BB.2. Roseburg shall install, operate, and maintain a Regenerative Thermal Oxidizer (RTO) to control VHAP emissions from the wood-fired green furnish predryer (ARM 17.8.749).
- BB.3. 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).
- BB.4. 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).
- BB.5. 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).

## **Compliance Demonstration**

- BB.6. Roseburg shall perform a Method 9 source test on the RTO within 180 days of initial start up to demonstrate compliance with the limitation contained in III.BB.1.

Thereafter, once per calendar week during daylight hours, Roseburg shall visually survey emissions from the RTO for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 5% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the hot oil heater. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- BB.7. Roseburg shall monitor compliance with Section III.BB.2 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).
- BB.8. Roseburg shall monitor compliance with Section III.BB.3 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 within 180 days of initial start up and thereafter, 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).
- BB.9. 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.BB.4 (ARM 17.8.1213).
- BB.10. Roseburg shall monitor compliance with Section III.BB.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**

- BB.11. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).

- BB.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).
- BB.13. Roseburg shall maintain the records required by Section III.BB.7 and III.BB.9 on site and submit the information to the Department upon request (ARM 17.8.1212).
- BB.14. 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**

BB.15. 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).

BB.16. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

BB.17. 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.

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

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

**Conditions**

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

## **Compliance Demonstration**

CC.2. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the outside truck dump, pile reclaim, and radial stacker for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the emitting units. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

## **Recordkeeping**

CC.3. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).

CC.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**

CC.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).

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

CC.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

**DD. Remanufacturing Facility**  
**EU050: Bullnose Fugitives (FUG 400)**  
**EU051: Paintline Fugitives (FUG 401)**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
DD.1, DD.5, DD.9, DD.10, DD.13, DD.14, DD.15	Opacity	20%	Visual Surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
DD.2, DD.6, DD.11, DD.14, DD.15	Production of Painted Material from Bullnose #2	14.7 Million Linear Feet per Rolling 12-Month Period	Recordkeeping	Monthly	Semiannual
DD.3, DD.7, DD.11, DD.14, DD.15	Paints (VOCs)	Water-Based Paints and U.V. Curable Fillers	Recordkeeping	Monthly	Semiannual
DD.4, DD.8, DD.12, DD.14, DD.15	Remanufacturing Facility	40 CFR 63, Subparts A and JJ	40 CFR 63, Subparts A and JJ	40 CFR 63, Subparts A and JJ	Semiannual

**Conditions**

- DD.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)).
- DD.2. The production of painted material from Bullnose #2 shall not exceed 14.7 million linear feet per rolling 12-month period (ARM 17.8.749).
- DD.3. Paints used on Roseburg’s paintline shall be water-based and fillers shall be ultra violet (U.V.) curable (ARM 17.8.749).
- DD.4. 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).

**Compliance Demonstration**

DD.5. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the emitting units for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the emitting units. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

- DD.6. Roseburg shall document, by month, the production of painted material from Bullnose #2. By the 25<sup>th</sup> day of each month, Roseburg shall total the production of painted material from Bullnose #2 during the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation contained in Section III.DD.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).
- DD.7. Roseburg shall monitor compliance with Section III.DD.3 by documenting, monthly, any instance in which the paints used on Roseburg's paintline were not water-based and fillers were not U.V. curable (ARM 17.8.1213).
- DD.8. Roseburg shall monitor compliance with Section III.DD.4 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).

### **Recordkeeping**

- DD.9. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).
- DD.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).
- DD.11. Roseburg shall maintain the records required by Section III.DD.6 and III.DD.7 on site and submit the information to the Department upon request (ARM 17.8.1212).
- DD.12. Roseburg shall maintain 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 Part 63, Subparts A and JJ).

### **Reporting**

- DD.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).
- DD.14. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- DD.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. 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, Subparts A and JJ.

**EE. EU048: Line 1 Board Cooler Vents 1, 2, and 3  
EU049: Line 2 Board Cooler Vents 1 and 2**

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
EE.1, EE.3, EE.5, EE.6, EE.7, EE.8, EE.9	Opacity	20%	Visual surveys	Weekly	Semiannual
			Method 9	Semiannual (if visual surveys are not conducted as specified)	
EE.2, EE.4, EE.6, EE.7, EE.8, EE.9	Particulate Matter, Industrial Process	$E = 55 * P^{0.11} - 40$	Method 5	As Required by the Department and Section III.A.1	Semiannual

**Conditions**

- EE.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)).
- EE.2. The particulate emissions from process weight shall not exceed the value calculated by  $E = 55.0 * P^{0.11} - 40$ , where E is the emissions in pounds per hour and P is the process weight in tons per hour (ARM 17.8.310).

**Compliance Demonstration**

- EE.3. Once per calendar week during daylight hours, Roseburg shall visually survey emissions from the board cooler vents for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous 2 years of the visual survey being performed. If sources of visible emissions are identified, Roseburg shall immediately conduct a Method 9 or 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 to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Roseburg of a liability for a violation determined using Method 9.

If visual surveys are not conducted once per calendar week during the reporting period, as specified above, Roseburg shall perform a semiannual Method 9 source test for the visible emissions from the board cooler vents. 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 meets or exceeds the applicable limit, 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 17.8.106 and ARM 17.8.1213).

EE.4. Roseburg shall monitor compliance with Section III.EE.2 by conducting EPA Method 5 source testing on the board cooler vents to determine the total particulate matter emissions from the vents. The testing and compliance monitoring of emissions from the vents 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**

EE.5. If weekly visual surveys are performed, Roseburg shall maintain, on-site, a log including all visual observations monitoring compliance with the visual survey requirement. The log shall include the required information, the date, the time, and the initials of the documenting personnel (ARM 17.8.1212).

EE.6. 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**

EE.7. 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).

EE.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

EE.9. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. A summary of results of the last source testing that was performed; and
- b. If weekly visual surveys are performed during the reporting period, a summary of the results contained in the weekly visual observations log.

## 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.

### 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 via a written, faxed, or 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)

- 1. This permit may be reopened and revised under the following circumstances:
  - a. 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);
  - b. 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;

- c. 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
- d. 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 (ARM 17.8.745(1) and 764(1)(b) are STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP)

1. Except as specified, no person shall construct, install, alter or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.744(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 15 tons per year of any pollutant, except (STATE ENFORCEABLE ONLY until approved by the EPA as part of the SIP):
  - a. Any construction or changed condition that would violate any condition in the facility's existing 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 15 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) (STATE ENFORCEABLE ONLY until approval by the EPA as part of the SIP).

## **Z. National Emission Standard for Asbestos**

40 CFR, Part 61, Subpart M

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

## **AA. Asbestos**

ARM 17.74, Subchapter 3, General Provisions and Subchapter 4, Fees

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

**BB. Stratospheric Ozone Protection – Servicing of Motor Vehicle Air Conditioners**  
40 CFR, Part 82, Subpart B

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

**CC. Stratospheric Ozone Protection – Recycling and Emission Reductions**  
40 CFR, Part 82, Subpart F

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

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

**DD. Emergency Episode Plan**

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

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

**EE. Definitions**

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

## APPENDICES

## Appendix A    INSIGNIFICANT EMISSION UNITS

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

Pursuant to ARM 17.8.1201(22)(a), an insignificant emission unit means any activity or 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)
IEU22	Wax Pump (I15)
IEU23	Gas Powered Sump Pump (I2)
IEU24	Fire Pond Dredging (I120)
IEU25	Diesel Tank (I23)
IEU26	Gasoline Storage Tank (I22)
IEU27	Melamine Press Vents (FUG)
IEU28	Melamine Burner (INTEC)
IEU29	Paint Drying Oven #1 (S400)
IEU30	Paint Drying Oven #2 (S401)
IEU31	Paint Drying Oven #3 (S402)

## 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 Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana state implementation plan and expressly requires adherence to any permit issued under such program.

**"Fugitive emissions"** means those emissions 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
NO <sub>x</sub>	oxides of nitrogen
NO <sub>2</sub>	nitrogen dioxide
O <sub>2</sub>	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 <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	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  
Permitting and Compliance Division  
Air Resources Management Bureau  
P.O. Box 200901  
Helena, MT 59620-0901

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

### Permit Modifications:

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

Office of Partnerships and Regulatory Assistance  
Air and Radiation Program  
US EPA Region VIII 8P-AR  
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 – #1 Predryer (DRY 500)

**Pollutant:** PM<sub>10</sub>

**Control Device:** Wet Electrostatic Precipitator (WESP)

**Emission Limit:** 6.21 lb/hr

**Monitoring Approach:** The monitoring approach for this CAM applicable emitting unit is contained in Table I below.

<b>Table I</b>	
<b>A. General Criteria</b>	
Indicator	WESP Power
Measurement Approach	Electrical power input is measured using a voltmeter and an ammeter. The total power (P) input to the WESP is the sum of the products of the secondary voltage (V) and the current (I) in each field. ( $P=V_1I_1 + V_2I_2$ )
Indicator Range	Due to the nature of WESP's, only a lower end value will be established for power input. An excursion occurs if the hourly average power input drops below its respective hourly average indicator value. The indicator value will be established during a source test (see Stack Test below). An excursion triggers an inspection/investigation, corrective action, and a reporting requirement.
<b>B. Performance Criteria</b>	
Data Representativeness	The voltage and current are measured using the instrumentation (voltmeter and ammeter) specifically designed and installed on the WESP to measure and control the performance.
Verification of Operational Status	Continuous monitoring of total WESP power input (kW)
Quality Assurance/Quality Control	Validate voltmeter and ammeter output on a semiannual basis in accordance with good engineering practices.
Monitoring Frequency	Continuous (at least every 5 minutes)
Data Collection Procedures	Continuous voltage and current readout in the Line 1 M & D control room. Every five minutes the computer will record the instantaneous voltage and current for the field for that moment. This methodology will provide 12 recorded power readings per 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 hour block will be generated.
Stack Test/Monitoring Initiation	After Department approval of the CAM Plan, Roseburg will schedule and conduct Method 201A (or Method 5 if the impinger analysis ("back-half") is included) testing to establish a suitable minimum power indicator value. The indicator value shall be 80% of the lowest average power (kW) applied to the WESP over the duration of any one run that resulted in emissions less than the emission limit during the afore mentioned test. The indicator value shall be established as expeditiously as practicable after Department approval (issuance of the final permit), but in no case shall the establishment of the indicator value prevent monitoring from beginning within 180 days after the permit becomes final and effective (ARM 17.8.1508(4)).

## 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**

<b>Maintenance Procedures</b>	<b>Duration</b>	<b>Frequency</b>
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 green dryer annual operating uptime)

**Table 2: RTO Maintenance Exemption**

<b>Maintenance Procedures</b>	<b>Duration</b>	<b>Frequency</b>
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