

**ENGINEERING CALCULATION SHEET****Page 1 of 15**

BAQ Engineering Services Division

2600 Bull Street, Columbia, SC 29201

Phone: 803-898-4123 Fax: 803-898-4079

Company Name: Roseburg Forest Products, L.P. (Holly Hill MDF Facility)**Permit Number:** TV-1860-0038**Permit Writer:** Hetal Patel**Date:** 02/15/2012**DATE APPLICATION RECEIVED:** 2/29/07, Significant Mod – 9/2/08**PHYSICAL LOCATION:** 1972, Gardner Blvd, Holly Hill**SIC/NAICS CODE(s):** 2493/321219**FACILITY DESCRIPTION**

This facility manufactures 3/4" fiberboard panels from green wood chips and plywood trim. The medium density fiberboard (MDF) manufacturing process begins with mechanical pulping of wood chips to fibers (refining), which are subsequently dried. The dried material is then blended with resin and wax. The resulting fiber is formed into a mat, and pressed in a hot press.

The furnish for MDF normally consists of wood chips, which are typically delivered by truck or rail from offsite locations such as sawmills, plywood plants, furniture manufacturing facilities, satellite chip mills, and whole tree chipping operations.

Clean chips are blended with wax and are softened in a steam-pressurized digester. The softened chips are then transported into a pressurized refiner chamber. In the refiner chamber, one stationary disk and one revolving disk are used to mechanically pulp the softened chips into fibers suitable for making the board.

From the refiners, resin is injected into the blow line and the fibers are transported to a single-stage-indirect-heated tube dryer which is used to reduce the moisture content of the fibers to desired levels. After drying, the fibers are separated from the gas stream by a fiber recovery cyclone and then conveyed to weight belts and dry storage bins.

Air conveys the resinated fibers from the dry storage bin to the forming machine, where they are deposited on a continuously moving screen system. The continuously formed mat is prepressed and pretrimmed. The flying cutoff saw cuts the continuously formed mat into individual mats. The trimmed material is collected and recycled to the forming machine. The prepressed and trimmed mats are then transferred to the six opening hot press. The press applies heat and pressure to activate the resin and bond the fibers into a solid panel. After pressing, the boards are cooled, sanded, trimmed, and sawed to final dimensions.

PROJECT DESCRIPTION

This is the facility's TV renewal. The following modifications are incorporated during this renewal:

- Construction permit CI – issued on 12/14/07 - install a bio-scrubber to control HAP emissions from the two existing dryers and press. Permission was also granted to build a press enclosure around the press and ducting the press emissions to the bio-scrubber. The facility submitted Significant Modification request on 8/26/08 to incorporate this construction permit into the TV. On 9/23/08, letter was issued to facility to operate the source with constraints of the construction permit and existing expired TV until it is rolled into the renewal TV.
- Construction permit CJ – issued on 4/16/08 - construct a Sanderdust Reinjection System to recycle sanderdust produced at the facility back into the board production process as wood fiber. The facility was currently burning the sanderdust as waste in the boiler. With this modification, the facility would have the option to burn the sanderdust in the boiler or reinject it back into the process as raw material. The facility constructed a new cyclone as part of this modification. The new cyclone is routed through an existing baghouse(B21) for control. The baghouse will control emissions from the existing sanderdust silo conveying system cyclone(C21) or the new sanderdust reinjection system cyclone(C21A). Since the facility would only run one option at a time, there would be no increase in actual emissions from this modification. The facility submitted a Minor Modification request on 4/9/08 and 3/13/08 to incorporate this construction permit into the TV. On 4/16/08, letter was issued to facility to operate the source with constraints of the construction permit and existing expired TV until it is rolled into the renewal TV.
- Exemption 01x issued on 7/2/04 to replace Dryer #1 Second Stage Bagfilter (Equipment C13A in Unit 03). For this exemption, a 502(b)10 request was submitted by the facility to incorporate this change to the TV permit. A response letter was issued on 9/14/04 to attach the 502(b)10 to the TV operating permit until it is rolled over into the permit.
- Exemption 02x issued on 1/12/05 to reroute the No. 4 refiner/digester high pressure steam relief valve exhaust to the Refiner Startup/Shutdown Bin (Equipment F04 in Unit 03).
- Other minor changes:
 1. Emission point EP07 was replaced with enclosed conveyor and re-designated as fugitive source F09.
 2. Emission points EP08 and EP09 were removed entirely.
 3. Emission point EP11 was replaced with enclosed conveyor and re-designated as fugitive source F10.
 4. GP Sawmill (1860-0002) was co-located with this facility. They are closed and permits were revoked through COB1 letter (what we call COB3 now). This letter was issued 8/11/03. I am removing all references to this facility in the permit.



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5. In the initial TV application, the facility stated the bagfilters/cyclones are integral process devices and not just there as control devices because they could not operate those sources without the bagfilters online and operating at all times. The TV greensheet did not state that the Bureau agrees with the facility, but the uncontrolled and controlled emissions were estimated after the bagfilters/cyclones. During this TV renewal, I have reviewed the sources and agree that the bagfilters are inherent process devices and have removed the monitoring associated with them and also changed the visual inspection frequencies for units 01-05 to semi-annual. The uncontrolled emissions presented in this greensheet are after the bagfilters/cyclones. The monitoring requirements have been removed from the TV.

- Std. 1 – Unit 06 is subject to Std. 1. In accordance with Section VI of Standard 1, the facility shall demonstrate compliance with sulfur dioxide emissions by source testing, continuous monitoring, or fuel analysis. This requirement was not in the initial TV permit but is being added during the renewal. Facility has elected to perform a source test once the boiler is placed back into operation.

SOURCE DESCRIPTION

Emission Unit ID	Emission Unit Description	Control Device Type (Generic Description)
01	Plytrim/Green Chip Conveying System	None
02	Bark/Fines Conveying System	None
03	Raw Material Refining and Drying	Biofilter
04	Mat Forming and Pressing	Biofilter
05	Fiberboard Finishing (sawing and sanding)	None
06	333.6 Million Btu/hr Wood-Fired Boiler	2 Multiclones in Parallel, ESP

CONTROL EQUIPMENT

Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled	Efficiency Capture (%)	Efficiency Removal (%)
MC	Boiler Multiclones (2 in parallel)	1974	PM/PM ₁₀	100	99
ESP	Boiler Electrostatic Precipitator (after multiclones)	1995	PM/PM ₁₀	100	99
Biofilter	TriMER Bioscrubber 300,000 ft ³ /min	2008	Formaldehyde	100	90

EXEMPT SOURCE/INSIGNIFICANT ACTIVITIES DESCRIPTION

Equip ID	Source Description (Date Listed)	Basis
FT1	Resin Storage Tank - 20,000 gallons (1974)	< 1000 lb/yr
FT2	Resin Storage Tank - 20,000 gallons (1974)	< 1000 lb/yr
FT3	Resin Storage Tank - 20,000 gallons (1974)	< 1000 lb/yr
FT4	Resin Storage Tank - 20,000 gallons (1974)	< 1000 lb/yr
FT5	Resin Storage Tank - 3,000 gallons (1974)	< 1000 lb/yr
FT6	Resin Storage Tank - 3,000 gallons (1974)	< 1000 lb/yr
FT9	Hydraulic Oil Storage Tank - 13,000 gallons (1974)	< 1000 lb/yr
FT10	Diesel Fuel Storage Tank - 10,000 gallons (1993)	< 1000 lb/yr
FE1	Refiner Water Squeeze Out Evaporator	< 1000 lb/yr

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The Bureau also received public comment from Mr. John Seiler. He also requested a public hearing. A Public Hearing was scheduled for November 16, 2010 at Orangeburg Elementary School, located at 1490 Brant Avenue, Holly Hill, SC 29059 at 6:30 pm. There were no public comments during the hearing. See response to comments document

Following administrative changes were made to the draft permit in an effort to make it cleaner and easy to follow:

Part 5.B – Generic Conditions:

Condition 5.B.1 – Removed Equipment ID C15, C16, and C17 from unit 04 since the control devices for these sources are considered inherent to the process and they do not require any monitoring. For each equipment, I added the associated control device ID.

Condition 5.B.2 – Added Unit ID 06 and Equipment ID WB20.

Condition 5.B.3 – Removed Equipment ID C15, C16, and C17 from unit 04 since the control devices for these sources are considered inherent to the process and they do not require any monitoring. For each equipment, I added the associated control device ID.

Part 5.C.03a and 5.C.03b – Equipment for Unit ID 03:

Added the prefix CD in the control device ID column.

Part 5.C.03c – Conditions for Unit ID 03:

Condition 03.1 – Removed all equipment ID that does not have a control device since a visual inspection for these sources is not required. Added a separate condition (03.4) for these removed sources for Opacity limit.

Part 5.C.04a and 5.C.04b – Equipment for Unit ID 04:

Added the prefix CD in the control device ID column.

Part 5.C.04c – Conditions for Unit ID 04:

Condition 04.1 – Removed Equipment P18 from this condition and moved it to a new condition (04.3).

Previous Condition 04.3 is now Condition 04.4.

Part 5.C.05b and 5.C.05c – Control device and Conditions for Unit 05:

Formatting – The two sections were merged together by accident. I separated the two tables. I also fixed the header for condition 05.3.

Part 5.C.06a and 5.C.06b – Equipment for Unit ID 06:

Added the prefix CD in the control device ID column.

Part 5.C.06c – Conditions for Unit ID 06:

Condition 06.2 – Added control device ID to Equipment ID column, 'biennial' was mis-spelled in the testing part of the condition. Deleted 'install' in the monitoring part of the condition.

Condition 06.3 – Removed 'All test plans, notifications,' part of the testing section since it is repetitious (included in generic condition 5.B.2).

Condition 06.4 – This condition is separated into two conditions (06.4 and 06.5). 06.4 have the Std. 3 requirements when burning wood fiber or sanderdust. Condition 06.5 have the Std. 3 requirements when burning spec oil. Also removed the 5 year recordkeeping requirement under monitoring section of condition 06.5 since it is repetitious (included in generic condition 5.B.4).

Part 5.D – Facility Wide Conditions:

Condition 5.D.2 – removed the 5 year recordkeeping requirement under monitoring section of condition 06.5 since it is repetitious (included in generic condition 5.B.4).

Condition 5.D.3 – Added 'approved' after 'submitted' in first sentence.

Part 7A – NESHAP Periodic Monitoring Schedule

Reformatted table under 7.A

Part 7.C – NESHAP Conditions:

Condition 7.C.2 – changed dates from July 31 and January 31 to July 30 and January 30.

Condition 7.C.3 – removed the 5 year recordkeeping requirement under monitoring section of condition 06.5 since it is repetitious (included in generic condition 5.B.4).

Condition 7.C.7 – removed the 5 year recordkeeping requirement under monitoring section of condition 06.5 since it is repetitious (included in generic condition 5.B.4). Also removed sentences that indicated who to submit the reports to.

Greensheet

GHG and PM_{2.5} emissions were added to the emission tables below.



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EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS				
ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
Unit 01: Plytrim/Green Chip Conveying System				
C02	PM	1.23	5.39	PM factor: 0.03 gr/scf, cyclone flow = 4800 scfm.
	PM ₁₀	0.72	3.15	58% of PM factor – based on EPA 450/4-90-003.
	PM _{2.5}	0.36	1.58	Assumed 50% of PM ₁₀
C06	PM	1.23	5.39	PM factor: 0.03 gr/scf, cyclone flow = 4800 scfm.
	PM ₁₀	0.72	3.15	58% of PM factor – based on EPA 450/4-90-003.
	PM _{2.5}	0.36	1.58	Assumed 50% of PM ₁₀
F01*	PM	0.55	2.4	Ap-42, and Engineering Judgement
	PM ₁₀	0.25	1.1	
	PM _{2.5}	0.13	0.55	Assumed 50% of PM ₁₀
F02*	PM	0.27	1.2	Ap-42, and Engineering Judgement
	PM ₁₀	0.13	0.55	
	PM _{2.5}	0.07	0.28	Assumed 50% of PM ₁₀
Unit 02: Bark/Fines Conveying System				
F09	PM	2.45	1.419	Ap-42, and Engineering Judgement
	PM ₁₀	1.12	0.65	
	PM _{2.5}	0.56	2.45	Assumed 50% of PM ₁₀
F03	PM	0.90	3.9	Ap-42, and Engineering Judgement
	PM ₁₀	0.41	1.8	
	PM _{2.5}	0.21	0.90	Assumed 50% of PM ₁₀
Unit 03: Raw Material Refining and Drying				
F10	PM	2.21	7.379	Ap-42, and Engineering Judgement
	PM ₁₀	1.01	3.382	
	PM _{2.5}	0.51	2.23	Assumed 50% of PM ₁₀
C14	PM	1.2	0.438	Ap-42, and Engineering Judgement , TPY emissions based on maximum of 730 hr/yr operation. Actual hours of operation is about 160 hr/yr based on past production records. PM _{2.5} is assumed to be 50% of PM ₁₀ .
	PM ₁₀	1.2	0.438	
	PM _{2.5}	0.60	0.219	
F04	PM	1.6	.0029	
	PM ₁₀	0.713	0.0013	
	PM _{2.5}	0.36	0.00065	
D1, C12A, C12B**	Condensable PM	10.60	46.43	AP-42
	PM	12	52.56	AP-42
	PM ₁₀	12	52.56	AP-42
	PM _{2.5}	12	52.56	Assumed 100% of PM ₁₀
	CO	1.36	5.96	AP-42
	VOC as Propane	112	490.56	AP-42
	THC	88	385.44	AP-42
	Acetaldehyde	0.4	1.752	AP-42
	Acetone	0.5	2.19	AP-42
	Alpha-pinene	42	183.96	AP-42
	Beta-Pinene	8.6	37.668	AP-42
	Camphene	2.4	10.512	AP-42
Formaldehyde	4.4	19.272	AP-42	



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ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	Limonene	2.2	9.636	AP-42
	Methanol	17.4	76.212	AP-42
	Methyl Isobutyl Ketone	0.098	0.4292	AP-42
	Phenol	0.46	2.0148	AP-42
C13A**	Acetaldehyde	0.07	0.3066	AP-42
	Acetone	0.068	0.2978	AP-42
	Alpha-pinene	1.1	4.818	AP-42
	Benzene	0.0146	0.0639	AP-42
	Formaldehyde	0.42	1.8396	AP-42
	Methanol	0.3	1.314	AP-42
	Toluene	0.0166	0.0727	AP-42
	D2, C12C, C12D**	Condensable PM	10.60	46.43
PM		12	52.56	AP-42
PM ₁₀		12	52.56	AP-42
PM _{2.5}		12	52.56	Assumed 100% of PM ₁₀
CO		1.36	5.96	AP-42
VOC as Propane		112	490.56	AP-42
THC		88	385.44	AP-42
Acetaldehyde		0.4	1.752	AP-42
Acetone		0.5	2.19	AP-42
Alpha-pinene		42	183.96	AP-42
Beta-Pinene		8.6	37.668	AP-42
Camphene		2.4	10.512	AP-42
Formaldehyde		4.4	19.272	AP-42
Limonene		2.2	9.636	AP-42
Methanol		17.4	76.212	AP-42
Methyl Isobutyl Ketone		0.098	0.4292	AP-42
Phenol		0.46	2.0148	AP-42
C13B**		Acetaldehyde	0.07	0.3066
	Acetone	0.068	0.2978	AP-42
	Alpha-pinene	1.1	4.818	AP-42
	Benzene	0.0146	0.0639	AP-42
	Formaldehyde	0.42	1.8396	AP-42
	Methanol	0.3	1.314	AP-42
	Toluene	0.0166	0.0727	AP-42
F05	PM	1.04	4.6	AP-42, & engineering judgment
	PM ₁₀	0.37	1.6	
	PM _{2.5}	0.19	0.81	Assumed 50% of PM ₁₀
Unit 03	Total VOC	88	385	1995 Source Test Data
Unit 04: Mat Forming and Pressing				
F06	PM	1.1	4.82	AP-42& engineering judgment
	PM ₁₀	0.40	1.8	
	PM _{2.5}	0.20	0.88	
C15	PM	1.49	2.2	Ap-42, and Engineering Judgement , TPY



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UNCONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	PM ₁₀	1.34	2.0	emissions based on maximum of 2920 hr/yr operation. Actual hours of operation is about 1284 hr/yr based on past production records.
	PM _{2.5}	1.34	2.0	
	PM	1.89	8.28	
C16	PM ₁₀	1.70	7.45	AP-42& engineering judgment
	PM _{2.5}	1.70	7.45	
	PM	1.79	7.84	
C17	PM ₁₀	1.61	7.05	AP-42& engineering judgment
	PM _{2.5}	1.61	7.05	
	PM	3.24	14.19	
P18**	Condensable PM	3.6	15.77	AP-42
	PM ₁₀	2.7	11.83	AP-42
	PM _{2.5}	2.7	11.83	Assumed 100% of PM ₁₀
	CO	0.612	2.68	AP-42
	VOC as Propane	14.4	63.07	AP-42
	THC	5.22	22.86	AP-42
	NOx	0.54	2.37	AP-42
	Acetaldehyde	0.252	1.1	AP-42
	Acrolein	0.0216	0.09	AP-42
	Benzaldehyde	0.0099	0.04	AP-42
	Butyldehyde	0.0432	0.19	AP-42
	Crotonaldehyde	0.0198	0.09	AP-42
	2,5 Dimethyl Benzaldehyde	0.045	0.20	AP-42
	Formaldehyde	8.64	37.84	AP-42
	Hexaldehyde	0.0522	0.23	AP-42
	Isovaleraldehyde	0.0252	0.11	AP-42
	Methanol	10.08	44.15	AP-42
	Methyl Ethyl Ketone	0.0106	0.05	AP-42
	Methyl Isobutyl Ketone	0.288	1.26	AP-42
	Phenol	0.486	2.13	AP-42
	Propionaldehyde	0.0097	0.04	AP-42
	o-Tolualdehyde	0.0126	0.06	AP-42
	p-Tolualdehyde	0.018	0.08	AP-42
Valeraldehyde	0.0432	0.19	AP-42	
Total VOC	6.8	30	1993 Stack Test Data	
F07	PM	0.94	3.7	Engineering judgment. Assumed these emissions were 10% of emissions at the press. TPY values based on maximum of 7920 hr/yr operation. Actual hours of operation is about 7704 hr/yr based on past production records. PM _{2.5} assumed to be 50% of PM ₁₀ .
	PM ₁₀	0.47	1.9	
	PM _{2.5}	0.24	1.03	
	CO	0.069	0.27	
	NOx	0.061	0.24	
	VOC	0.68	2.7	
	Formaldehyde	0.04	0.16	
F08	PM	0.97	4.3	AP-42 Table 10.6.3-6 & engineering judgment. PM _{2.5} assumed to be 50% of PM ₁₀ .
	PM ₁₀	0.068	0.3	



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UNCONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	PM _{2.5}	0.03	0.15	
	VOC	2.34	10	
	Formaldehyde	2.0	8.7	
Unit 05: Fiberboard Finishing (Sawing and Sanding)				
C10	PM	0.69	3.02	AP-42& engineering judgment
	PM ₁₀	0.40	1.8	
	PM _{2.5}	0.20	0.88	
C21/C21A	PM	0.12	0.53	AP-42& engineering judgment
	PM ₁₀	0.11	0.48	
	PM _{2.5}	0.11	0.48	
C22	PM	1.77	7.8	AP-42& engineering judgment
	PM ₁₀	1.59	7.0	
	PM _{2.5}	1.59	7.0	
C23	PM	0.84	3.7	AP-42& engineering judgment
	PM ₁₀	0.75	3.3	
	PM _{2.5}	0.75	3.3	
C24	PM	2.64	11.6	AP-42& engineering judgment
	PM ₁₀	2.38	10.4	
	PM _{2.5}	2.38	10.4	
C25	PM	1.52	6.66	AP-42& engineering judgment
	PM ₁₀	1.37	6.00	
	PM _{2.5}	1.37	6.00	
Unit 06: 333.6 Million Btu/hr Wood-Fired Boiler				
WB20	CO ₂	62583	274,115	40 CFR Part 98, Subpart C, Tables C-1 and C-2
	CH ₄	448.36	1964	
	N ₂ O	868.69	3805	
	PM	18.7	81.8	AP-42, 5th ed. 9/2003 & Engineering Judgment
	PM ₁₀	16.7	73.1	AP-42, 5th ed. 9/2003 & Engineering Judgment
	PM _{2.5}	15.20	66.6	Assumed 91% of PM ₁₀
	SO ₂	8.39	36.7	Factor is based upon combination of a max of 1.25 Million Btu/hr rating for used oil and a max of 332.4 Million Btu/hr for Green Wood Residuals, for a combined maximum factor of 8.39 lb/hr of SO _x , 0.036 lb/hr of Pb, and 9.0e-03 lb/hr for arsenic.
	CO	200	877	AP-42, 5th ed. 9/2003 & Engineering Judgment
	NO _x	163	716	AP-42, 5th ed. 9/2003 & Engineering Judgment
	VOC	12.7	55.5	AP-42, 5th ed. 9/2003 & Engineering Judgment



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UNCONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	Lead	3.6E-02	1.6E-01	Control Efficiencies for PM and PM10 are 99.17%, and 89% for lead, after multiclone and ESP. (Source - vendor data and AP-42) Factor is based upon combination of a max of 1.25 Million Btu/hr rating for used oil and a max of 332.4 Million Btu/hr for Green Wood Residuals, for a combined maximum factor of 8.39 lb/hr of SO _x , 0.036 lb/hr of Pb, and 9.0e-03 lb/hr for arsenic.
	Formaldehyde	1.47	6.43	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Acetaldehyde	0.28	1.21	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Acetophenone	1.1E-06	4.7E-06	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Acrolein	1.33	5.84	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Benzene	1.4	6.14	AP-42, 5th ed. 9/2003 & Engineering Judgment
	bis(2-Ethylhexyl) phthalate	1.6E-05	6.9E-05	AP-42, 5th ed. 9/2003 & Engineering Judgment
	2-Butanone (MEK)	1.8E-03	7.9E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Carbon tetrachloride	1.5E-02	6.6E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Chlorine	0.26	1.15	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Chlorobenzene	1.1E-02	4.8E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Chloroform	9.3E-03	4.1E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Crotonaldehyde	3.3E-03	1.4E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	2,4-Dinitrophenol	6.0E-05	2.6E-04	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Ethylbenzene	1.0E-02	4.5E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Hydrogen Chloride	6.3	27.8	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Naphthalene	3.2E-02	1.4E-01	AP-42, 5th ed. 9/2003 & Engineering Judgment
	4-Nitrophenol	3.7E-05	1.6E-04	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Pentachlorophenol	1.7E-05	7.5E-05	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Phenol	1.7E-02	7.5E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Propionaldehyde	2.0E-02	8.9E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Styrene	0.63	2.78	AP-42, 5th ed. 9/2003 & Engineering Judgment
	2,3,7,8-tetrachloro dibenzo-p-dioxin	2.9E-09	1.3E-08	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Toluene	3.1E-01	1.34	AP-42, 5th ed. 9/2003 & Engineering Judgment
	2,4,6-Trichlorophenol	7.3E-06	3.2E-05	AP-42, 5th ed. 9/2003 & Engineering Judgment



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BAQ Engineering Services Division

2600 Bull Street, Columbia, SC 29201

Phone: 803-898-4123 Fax: 803-898-4079

Company Name: Roseburg Forest Products, L.P. (Holly Hill MDF Facility)

Permit Number: TV-1860-0038

Permit Writer: Hetal Patel

Date: 02/15/2012

UNCONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	Vinyl Chloride	6.0E-03	2.6E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	o-Xylene	8.3E-03	3.7E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Antimony	2.6E-03	1.2E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Arsenic	7.4E-03	0.032	Factor is based upon combination of a max of 1.25 Million Btu/hr rating for used oil and a max of 332.4 Million Btu/hr for Green Wood Residuals, for a combined maximum factor of 8.39 lb/hr of SO _x , 0.036 lb/hr of Pb, and 9.0e-03 lb/hr for arsenic.
	Beryllium	3.7E-04	1.6E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Cadmium	1.4E-03	6.0E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Chromium total	7.0E-04	0.031	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Chromium-6	1.2E-03	5.1E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Cobalt	2.2E-03	9.5E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Manganese	0.53	2.34	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Mercury	1.2E-03	5.1E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Nickel	1.1E-02	4.8E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Phosphorus	9.0E-03	3.9E-02	AP-42, 5th ed. 9/2003 & Engineering Judgment
	Selenium	9.3E-04	4.1E-03	AP-42, 5th ed. 9/2003 & Engineering Judgment

*The emissions rates presented in the application did not include lb/hr values. Upon reviewing the emission calculations, some of the lb/hr values listed in table of Form D were actually the actual tpy values presented in calculations. These values in the table are from the original TV application and greensheet (that was issued in 2002).

** These values are from the construction permit CI issued for the boifilter since the permit was issued after the TV renewal application.

CONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
Unit 03: Raw Material Refining and Drying				
D1, C12A, C12B**	Formaldehyde*	0.44	1.9272	AP-42
C13A**	Formaldehyde*	0.042	0.18396	AP-42
D2, C12C, C12D**	Formaldehyde*	0.44	1.9272	AP-42
C13B**	Formaldehyde*	0.042	0.18396	AP-42
Unit 04: Mat Forming and Pressing				
P18**	Formaldehyde*	0.864	3.78	AP-42
Unit 06: 333.6 Million Btu/hr Wood-Fired Boiler				
WB20	PM	1.55	6.8	Control Efficiencies for PM and PM ₁₀ , and PM _{2.5} are 99.17%, and 89% for lead, after multiclone and ESP. (Source - vendor data and AP-42).
	PM ₁₀	1.38	6.1	
	PM _{2.5}	1.26	5.5	



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Permit Number: TV-1860-0038

Permit Writer: Hetal Patel

Date: 02/15/2012

CONTROLLED POTENTIAL EMISSIONS

ID	Pollutant	lb/hr	TPY@ 8760 hours	Method for Estimating Emissions
	Lead	4.0E-03	1.7E-02	

*These control emission estimates are based on 90% control efficiency.

** These emission estimates were from the biofilter construction permit CI since this permit was issued after the TV renewal application.

FACILITY WIDE EMISSIONS

Pollutant	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	TPY@ 8760 hours	lb/hr	TPY
PM	74.74	299.26	57.59	224.26
PM ₁₀	62.23	255.35	46.91	188.35
PM _{2.5}	57	238.04	43	176.9
CO	203.40	891.87	--	--
NOx	163.60	718.61	--	--
SO ₂	8.39	36.7	--	--
Total VOC's	110.5	484	94.1*	412.1*
Total HAPs	74	324	68.66*	300.71*
Acetaldehyde (H, T, V)	1.472	6.4272	--	--
Acetone	1.136	4.9756	--	--
Acetophenone (H, T, V)	1.10E-06	4.70E-06	--	--
Acrolein (H, T, V)	0.0216	0.09	--	--
Alpha-pinene (V)	86.2	377.556	--	--
Antimony (H, T)	2.60E-03	1.20E-02	--	--
Arsenic (H,T)	7.40E-03	0.032	--	--
Benzene (H, T, V)	1.43	6.27	--	--
Beta-Pinene (V)	17.2	75.336	--	--
Benzaldehyde (V)	0.0099	0.04	--	--
Beryllium (H, T)	3.70E-04	1.60E-03	--	--
Butyldehyde (V)	0.0432	0.19	--	--
Cadmium (H, T)	1.40E-03	6.00E-03	--	--
Camphene (V)	4.8	21.024	--	--
Carbon tetrachloride (H, T, V)	1.50E-02	6.60E-02	--	--
Chlorine (H, T)	0.26	1.15	--	--
Chlorobenzene (H, T, V)	1.10E-02	4.80E-02	--	--
Chloroform (V)	9.30E-03	4.10E-02	--	--
Chromium-6 (H, T)	1.20E-03	5.10E-03	--	--
Chromium total (H)	7.00E-04	0.031	--	--
Cobalt (H, T)	2.20E-03	9.50E-03	--	--
Crotonaldehyde (V)	2.31E-02	1.04E-01	--	--
2,5 Dimethyl Benzaldehyde	0.045	0.2	--	--
2,4-Dinitrophenol (H, T, V)	6.00E-05	2.60E-04	--	--
Ethylbenzene (H, T, V)	1.00E-02	4.50E-02	--	--
bis(2-Ethylhexyl) phthalate (H, T, V)	1.60E-05	6.90E-05	--	--
Formaldehyde (H, T, V)	21.79	95.35	5.34	23.29
Hexaldehyde	0.0522	0.23	--	--
Hydrogen Chloride	6.3	27.8	--	--
Isovaleraldehyde	0.0252	0.11	--	--
Lead (H)	3.60E-02	1.60E-01	--	--



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Permit Number: TV-1860-0038

Permit Writer: Hetal Patel
Date: 02/15/2012

FACILITY WIDE EMISSIONS				
Pollutant	Uncontrolled Emissions		Controlled Emissions	
	lb/hr	TPY@ 8760 hours	lb/hr	TPY
Limonene	4.4	19.272	--	--
Manganese (H, T)	0.53	2.34	--	--
Mercury (H, T)	1.20E-03	5.10E-03	--	--
Methanol (H, T, V)	45.48	199.202	--	--
Methyl Ethyl Ketone (T, V)	1.24E-02	5.79E-02	--	--
Methyl Isobutyl Ketone (H, T, V)	0.484	2.1184	--	--
Naphthalene (H, T, V)	3.20E-02	1.40E-01	--	--
Nickel (H, T)	1.10E-02	4.80E-02	--	--
4-Nitrophenol (H, T, V)	3.70E-05	1.60E-04	--	--
Pentachlorophenol (H, T, V)	1.70E-05	7.50E-05	--	--
Phenol (H, T, V)	1.42	6.23	--	--
Phosphorus (H, T)	9.00E-03	3.90E-02	--	--
Propionaldehyde (H, T, V)	2.97E-02	1.29E-01	--	--
Selenium (H, T)	9.30E-04	4.10E-03	--	--
Styrene (H, T, V)	0.63	2.78	--	--
2,3,7,8-tetrachloro dibenzo-p-dioxin (H)	2.90E-09	1.30E-08	--	--
Toluene (H, T, V)	3.43E-01	1.49	--	--
o-Tolualdehyde	0.0126	0.06	--	--
p-Tolualdehyde	0.018	0.08	--	--
2,4,6-Trichlorophenol (H, T, V)	7.30E-06	3.20E-05	--	--
Valeraldehyde	0.0432	0.19	--	--
Vinyl Chloride (H, T, V)	6.00E-03	2.60E-02	--	--
o-Xylene (H, T, V)	8.30E-03	3.70E-02	--	--
CO ₂	62583	274,115	--	--
CH ₄	448.36	1964	--	--
N ₂ O	868.69	3805	--	--

The controlled VOC and HAP emissions were estimated by taking uncontrolled values and subtracting the reduction of Formaldehyde.

REGULATIONS

SC Regulations 61-62.5, Standard 1 - Emissions from Fuel Burning Operations

Applicable Unit 06 (Wood Fired Boiler) has Opacity, PM, and SO₂ emissions imposed by this regulation. Opacity is limited to 20%, PM is limited to 0.6 lb/Million Btu, SO₂ is limited to 3.5 lb/Million Btu. The boiler must utilize a COM with required record keeping and perform bi-annual source testing for PM emissions. The boiler utilizes wood waste for fuel, along with spec oil at a rate no greater than 500 gallons per week. To demonstrate compliance with the sulfur emission limitation, facility shall conduct source test within 180 days of putting the boiler back into operation.

SC Regulations 61-62.5, Standard 2 - Ambient Air Quality Standards (AAQS)

Applicable Modeling is being deferred at this time since the facility is 'idle'.
Note: A condition was added to section 7 of the Title V Operating Permit for the facility to submit a complex-wide air dispersion analysis when the facility resumes operations. The new emissions submitted with this application were different than the emissions currently modeled for many of the pollutants. Since the facility is not in operation, modeling will be required prior to resuming operations of any process at the facility. The standard modeling conditions in section 4 of the operating permit were deleted with attachment A. If and when the facility decide to put the sources back into operation, the facility would have to demonstrate compliance with all modeling standards and at that time, the standard modeling conditions will need to be added to the permit with Attachment A tables. Modeling condition in section 7 should be removed at that time.



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SC Regulations 61-62.5, Standard 3 - Waste Combustion and Reduction (State Only)

Applicable The oil burned in the boiler is considered spec oil and is subject to this standard on an exempt level basis under Section III(J)(7). A current chemical analysis must be kept on-site at all times. See permit for additional conditions. Additionally, some of the sanderdust and wood fiber sent to the boiler and used as fuel is produced post-refiner, and therefore contains small amounts of Urea-Formaldehyde resin. See the permit for emission limit per Standard 3 Section III(J)(1) Table III. Due to the high efficiency of the boiler in destruction of the resin and the low amounts of resin burned in the boiler, no monitoring will be required.

SC Regulations 61-62.5, Standard 3.1 - Medical Waste Incineration (State Only)

Not Applicable No medical waste incineration.

SC Regulations 61-62.5, Standard 4 - Emissions from Process Industries

Applicable The following emission sources have opacity limits (including any fugitives) and Particulate Matter (PM) allowable emissions rates (based on a process weight rate in tons per hour) imposed by this standard:

ID	Opacity (%)	PM Allowable (lb/hr)	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Controlled PM Emissions (lb/hr)	Monitoring
01: C06, F01, F02	40	49.5	83.4	3.28	--	Semi-Annual Visual Inspection.
01: C02	20					
02: F03	40	41.9	37.5	2.13	--	Semi-Annual Visual Inspection.
02: F09	20					
03: F04, F05	40	42.2	39.47	29.03	--	Semi-Annual Visual Inspection.
03: F10, C14, D1, D2, C12A, C12B, C12C, C12D, C13A, C13B	20					
04: F06, C17, C16, F08	40	40.4	31.6	11.78	--	Semi-Annual Visual Inspection.
04: C15, P18, F07	20					
05: C21	40	40.4	31.6	7.58	--	Semi-Annual Visual Inspection.
05: C10, C21A, C22, C23, C24, C25	20					

SC Regulations 61-62.5, Standard 5 - Volatile Organic Compounds (VOC)

Not Applicable None of the processes, which are regulated by the regulation, apply.

SC Regulations 61-62.5, Standard 5.1 - Best Available Control Technology (BACT)/Lowest Achievable Emission Rate ("LAER") Applicable To Volatile Organic Compounds (State Only)

Not Applicable The facility's baseline VOC emissions (509.6 TPY), current actual VOC emissions (412.1 TPY), and net VOC increase for LAER (-23.4 TPY) are outlined in the table below based on information submitted by Kristina Lee. The facility is not subject to BACT/LAER at this time.



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Permit Writer: Hetal Patel
Date: 02/15/2012

Date	Activity	+/- VOC Emissions (ton/yr)	VOC Total Emissions (ton/yr)	Net VOC Increase for LAER (ton/yr)	LAER Applicability
1979	RFPCo Holly Hill MDF Facility Baseline	0.0	509.6	0.0	See note 1 below.
2010	Title V Renewal	-97.5	412.1	-97.5	See note 2 below.

NOTE:

1. Facility Baseline calculated as sum of the VOC emissions from:

Plywood Mill	12.7 tpy
Sawmill	187.0 tpy
<u>MDF</u>	<u>309.9 tpy</u>
Total	509.6 tpy

This information was agreed upon by both Georgia Pacific and South Carolina Department of Health and Environmental Control.

2. VOC emissions at the time of the 2010 Title V renewal account for the permanent closure of the Plywood Mill and the Sawmill, and updated emission factors for the MDF Facility. This value also accounts for reduction of Formaldehyde emissions for the MACT.

Based upon this information, the facility is operating well below the LAER threshold, and their controlled VOC emissions, 486 tpy, are less than the LAER threshold. The initial Title V permit had a complex-wide VOC limit that has been removed during this renewal since the facility's net increase for LAER/BACT is low.

SC Regulations 61-62.5, Standard 5.2 - Control Of Oxides Of Nitrogen (NO_x)

Not Applicable Facility has not made any modifications to any sources that emit NO_x emissions since the applicability date of this regulation.

SC Regulations 61-62.5, Standard 6 - Alternative Emission Limitation Options (Bubble)

Not Applicable

SC Regulations 61-62.5, Standard 7 - Prevention of Significant Deterioration (PSD)

Not Applicable The facility's PTE for any pollutant is greater than 250 TPY and is an existing major plant for PSD but they have not had any significant increases to trigger a PSD review.

The dryers had been replaced with new dryers but a PSD review was not done at that time. During what is known as the Wood Products Initiatives, the EPA and Georgia-Pacific agreed to a production limit for facility-wide MDF production. These limits, which are different than the state established limits, and are as stated below and appear in the permit, are for the life of the source, unless a full PSD review is completed for the dryers.

The facility will limit monthly production to 12.31 Million SF (3/4" basis) for five-week months and 9.85 Million SF (3/4" basis) for four-week months. The plant shall be limited to a weekly production rate of 2.8 Million SF (3/4" basis). This is per the Consent Decree between the US EPA and Georgia-Pacific Corporation dated July 18, 1996.

SC Regulations 61-62.5, Standard 7, Section II - Prevention of Significant Deterioration (PSD), Ambient Air Limits (Berkley County)

Applicable Modeling is being deferred at this time since the facility is 'idle'.



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Date: 02/15/2012

Note: A condition was added to section 7 of the Title V Operating Permit for the facility to submit a complex-wide air dispersion analysis when the facility resumes operations. The new emissions submitted with this application were different than the emissions currently modeled for many of the pollutants. Since the facility is not in operation, modeling will be required prior to resuming operations of any process at the facility. The standard modeling conditions in section 4 of the operating permit were deleted with attachment A. If and when the facility decide to put the sources back into operation, the facility would have to demonstrate compliance with all modeling standards and at that time, the standard modeling conditions will need to be added to the permit with Attachment A tables. Modeling condition in section 7 should be removed at that time.

SC Regulations 61-62.5, Standard 7.1 - Nonattainment New Source Review (NSR)

Not Applicable Orangeburg County is an attainment area.

SC Regulations 61-62.5, Standard 8 - Toxic Air Pollutants (TAPs) (State Only)

Applicable Modeling is being deferred at this time since the facility is 'idle'.

Note: A condition was added to section 7 of the Title V Operating Permit for the facility to submit a complex-wide air dispersion analysis when the facility resumes operations. The new emissions submitted with this application were different than the emissions currently modeled for many of the pollutants. Since the facility is not in operation, modeling will be required prior to resuming operations of any process at the facility. The standard modeling conditions in section 4 of the operating permit were deleted with attachment A. If and when the facility decide to put the sources back into operation, the facility would have to demonstrate compliance with all modeling standards and at that time, the standard modeling conditions will need to be added to the permit with Attachment A tables. Modeling condition in section 7 should be removed at that time.

SC Regulations 61-62.6 - Control of Fugitive Particulate Matter

Applicable The fugitive PM (Dust) emissions are controlled in a manner that should not produce undesirable levels of PM (Dust) emissions.

SC Regulation 61-62.63 - National Emission Standards for Hazardous Air Pollutants: 112(g) (June 28, 1998)

Not Applicable The processes that emit HAP emissions were installed prior to June 28, 1998.

SC Regulation 61-62.68 (40 CFR 68) - Chemical Accident Prevention Provisions: 112(r)

Not Applicable

SC Regulation 61-62.70 - TITLE V Operating Permit Program

Applicable The facility is a major source for PM₁₀, CO, VOC, NO_x, and HAP. Facility has submitted the appropriate applications. This is the facility's operating permit renewal.

40 CFR 60 - Standards of Performance for New Stationary Sources (NSPS)

Not Applicable This process does not contain sources subject to this standard. Da or Db does not apply because the boiler burns wood waste and was installed in 1974. Subpart D applies to fossil fuel fired steam generators that commenced construction after August 17, 1971. Subpart Db applies to steam generating unit that commences construction, modification, or reconstruction after June 19, 1984.

40 CFR 61 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

Not Applicable This facility does emit some of the pollutants subject to this standard (benzene, beryllium, arsenic, mercury, and vinyl chloride) but the facility does not have one of the processes described under this Part.

40 CFR 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT)

Applicable The following existing emission sources at the facility subject to the following MACT Standards:

OP ID	CP ID	Affected Source(s)	Equipment ID	MACT Standard	Compliance Option
03	CI	2 Dryers	D1, D2	Subpart DDDD	Facilities elected



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Permit Number: TV-1860-0038

Permit Writer: Hetal Patel

Date: 02/15/2012

OP ID	CP ID	Affected Source(s)	Equipment ID	MACT Standard	Compliance Option
04	CI	Press	P18		add on control option and will reduce Formaldehyde emissions by \geq 90%.

Facility is utilizing a bioscrubber to control Formaldehyde/Methanol emissions to comply with this MACT. See section 7 of the Title V permit for specific requirements of this MACT. Facility requested flexibility to either demonstrate compliance with Formaldehyde or Methanol.

Facility has elected to demonstrate compliance with work practice requirements for Group 1 Miscellaneous Coating operations, the facility will use non-HAP coatings and keep records on-site.

40 CFR 64 - Compliance Assurance Monitoring (CAM): (April 20, 1998)

Not Applicable Units 03, 04, and 06's PTE exceeds Title V threshold limits (PTE >10/25 TPY HAP or >100 TPY criteria pollutants). Units 03 and 04 are subject to the Plywood MACT for the HAPs therefore, these sources are not subject to CAM. Unit 06 has CO and NOx emissions above 100 TPY but the facility is not utilizing any control devices for these pollutants to meet any standard. The facility is not subject to CAM at this time.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.