



S.C. Department of Health and  
Environmental Control

## **Bureau of Air Quality Final Determination**

**Resolute FP US Inc. – Catawba Lumber Mill  
5300 Cureton Ferry Road  
Catawba, South Carolina 29704  
York County**

Permit No. 2440-0216-CA  
November 3, 2017

This review was performed by the Bureau of Air Quality of the South Carolina Department of Health and Environmental Control in accordance with South Carolina Regulations for the Prevention of Significant Air Quality Deterioration.

**Reviewed by:**

A handwritten signature in black ink that reads "Katharine K. Buckner".

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Katharine K. Buckner  
Permit Writer  
Bureau of Air Quality

**Approved by:**

A handwritten signature in black ink that reads "Steve McCaslin for".

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Steve McCaslin, P. E., Director  
Air Permitting Division  
Bureau of Air Quality

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## 1.0 Time Line (Permitting Action History)

October 27, 2016	A Prevention of Significant Deterioration (PSD) pre-application meeting was held with representatives from Resolute FP US Inc. – Catawba Lumber Mill (Resolute), Trinity Consultants (Trinity), AECOM, and the South Carolina Department of Health and Environmental Control (SC DHEC), Bureau of Air Quality (BAQ).
March 3, 2017	SC DHEC received a PSD permit application from Resolute.
March 7, 2017	K. Buckner of BAQ had telephone conversation with Tony Jabon of Trinity pertaining to the PSD application.
March 9, 2017	Emailed David Stewart of Resolute and Tony Jabon of Trinity that additional information is needed to make completeness determination.
March 21, 2017	Received a revised application via email from Trinity addressing comments from March 9, 2017.
March 23, 2017	Engineering Services of BAQ emailed a copy of the application to Lorinda Shepherd of the Environmental Protection Agency (EPA) and notified her of the receipt of the PSD permit application.
March 23, 2017	Engineering Services of BAQ mailed out to Catherine Collins of US Fish and Wildlife Service (FWS), Bill Jackson of the US Forest Service (FS), and Susan Johnson of the National Park Service (NPS), letters informing them that BAQ was in receipt of and was currently reviewing a PSD application from Resolute.
March 27, 2017	John Glass of BAQ emailed Tony Jabon of Trinity a request for additional information on the air dispersion modeling.
April 4, 2017	Engineering Services of BAQ emailed a copy of the application to Lorinda Shepherd of the EPA and informed her that BAQ had deemed the application complete.
April 4, 2017	Engineering Services of BAQ emailed a letter to David Stewart of Resolute informing him that BAQ has deemed the application complete; the application will undergo a preliminary determination.

April 5, 2017 Engineering Services of BAQ mailed out to Catherine Collins (FWS), Bill Jackson (FS), and Susan Johnson (NPS), letters informing them that BAQ has deemed the application complete; the application will undergo a preliminary determination.

April 5, 2017 K. Buckner of BAQ left a voice message with Tony Jabon of Trinity with questions on the modeled emission rates versus emission calculations.

April 6, 2017 Taylor Loftis of Trinity emailed updated information based on voice message of April 5, 2017.

April 14, 2017 K. Buckner of BAQ requested additional information on the BACT review and several corrections within the application.

April 24, 2017 Tony Jabon of Trinity emailed responses and associated attachments to request of April 14, 2017.

May 4 – June 21, 2017 Various requests sent by K. Buckner of BAQ for additional information emailed to Tony Jabon of Trinity and David Stewart of Resolute, who responded with the requested information.

June 23 – August 28, 2017 K. Buckner of BAQ emailed drafts of the construction permit, statement of basis, and preliminary determination to the facility and consultants for review and comments. Several iterations of commenting and addressing comments occurred during this time along with revised air dispersion modeling.

September 5, 2017 The BAQ placed the PSD Preliminary Determination and PSD Construction Permit No. 2440-0216-CA on public notice for a thirty-(30) day comment period on the BAQ website. All appropriate Federal and State Officials were notified.

October 4, 2017 The BAQ received comments from The Catawba Indian Nation concerning the draft permit. The BAQ also received comments from the Environmental Protection Agency (EPA).

November 3, 2017 The BAQ issued a Final Determination and Construction Permit for Permit No. 2440-0216-CA as a Department Decision.

## 2.0 Introduction

### 2.1 Project Overview

Resolute proposes to construct a lumber mill that will be co-located with the existing pulp and paper mill at the Catawba Facility. The project will include the installation of a log pile, sawmill and debarker, three (3) continuous dual-path direct-fired lumber kilns, and a planer mill. The direct-fired kilns will combust gasified green sawdust and chip fines, and will each be rated at 35 million British thermal units per hour (MMBtu/hr). The lumber mill will have a potential throughput of 312.5 million board feet of finished lumber per year (MMBF/yr). Emission sources will include the sawmill, the debarker, the direct-fired kilns (including startup emissions), the planer mill, storage silos and bins, and truck and forklift traffic, as well as material handling between sources. Emissions from the planer mill will be controlled by a baghouse. Inherent cyclones on the Kiln Fuel Silos and an inherent bin vent filter on the Planer Mill Shaving Silo will be used to retain material in the silos while minimizing emissions from the silos

Due to emissions increases associated with this proposal, the project is subject to S.C. Regulation 61-62.5, Standard No. 7, "Prevention of Significant Deterioration (PSD)." As stated, the proposed project is subject to review under S.C. Regulation 61-62.5, Standard No. 7, "Prevention of Significant Deterioration." This regulation is equivalent to the Federal Prevention of Significant Deterioration of Air Quality regulations in Title 40 Code of Federal Regulations (CFR) Section 52.21. Pursuant to these regulations, new major stationary sources and modifications to major stationary sources of air pollution must demonstrate that they will not significantly deteriorate the air quality in their region. Resolute FP US Inc. – Catawba Lumber Mill has potential emissions for particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM<sub>2.5</sub>), carbon monoxide (CO), volatile organic compounds (VOC), and greenhouse gases (GHG), which exceed the significance levels allowed in this regulation. GHG emissions from this project are being addressed on a carbon dioxide equivalent basis (CO<sub>2e</sub>). For simplicity, hereafter, the term CO<sub>2e</sub> will be used to represent all greenhouse gases. The PSD review was conducted for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, VOC, and CO<sub>2e</sub> and includes Best Available Control Technology (BACT) determinations and Ambient Air Impact Analyses.

### 2.2 Regulatory Applicability

The increased production capacity results in potential emissions that exceed the PSD significant thresholds. By virtue of the proposed increase, this project is subject to review under the following standards in S.C. Regulation 61-62 and Federal standards:

- S.C. Regulation 61-62.5, Standard No. 2, *Ambient Air Quality Standards*

- S.C. Regulation 61-62.5, Standard No. 4, *Emissions from Process Industries*
- S.C. Regulation 61-62.5, Standard No. 5.2, *Control of Oxides of Nitrogen (NO<sub>x</sub>)*
- S.C. Regulation 61-62.5, Standard No. 7, *Prevention of Significant Deterioration*
- S.C. Regulation 61-62.5, Standard No. 8, *Toxic Air Pollutants*
- S.C. Regulation 61-62.6, *Control of Fugitive Particulate Matter*
- S.C. Regulation 61-62.7, *Good Engineering Practice Stack Height*
- S.C. Regulation 61-62.63 and 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, Subpart A, General Provisions*
- S.C. Regulation 61-62.63 and 40 CFR 63, *National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants (NESHAP): Plywood and Composite Wood Products*
- S.C. Regulation 61-62.70, *Title V Operating Permit Program*

### 2.3 Significant Emission Rates

As shown in Table 1, this project exceeds the significant threshold as defined under PSD for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, VOC, and CO<sub>2e</sub> emissions. Startup emissions are included in the total emissions in the table below.

<b>Table 1 – PSD Applicability Analysis</b>			
<b>Pollutant</b>	<b>Controlled Emissions Increase</b>	<b>PSD Significant Threshold</b>	<b>Significant Increase?</b>
	<b>TPY</b>	<b>TPY</b>	
PM	32.85	25	Yes
PM <sub>10</sub>	20.36	15	Yes
PM <sub>2.5</sub>	17.48	10	Yes
SO <sub>2</sub>	11.62	40	No
NO <sub>x</sub>	36.05	40	No
CO	117.06	100	Yes
VOC	909.46	40	Yes
Lead	8.38E-03	0.6	No
CO <sub>2e</sub>	99,511	75,000	Yes

### 3.0 Comments and Responses

On October 4, 2017, the Bureau of Air Quality (BAQ) received comments from the Catawba Indian Nation regarding the draft preliminary determination, in addition to comments from Region IV of the United States Environmental Protection Agency (EPA) regarding the application and draft statement of basis.

**Catawba Indian Nation comment:** Requested a cost analysis for the control of VOCs and condensable PM<sub>2.5</sub> from the lumber kilns for biofiltration control and the equipment needed to cool the exhaust stream sufficiently to use biofiltration.

**BAQ response:** The BAQ agrees, the exhaust stream could potentially be cooled to an acceptable temperature for treatment in a biofilter. However, in Section 5.6 of the application, another technical issue is presented which makes the biofilter infeasible. The primary constituent, terpene, is highly viscous and would foul the biofilter. This issue supports a biofilter being infeasible and excluded from further evaluation in the BACT review. Therefore, BAQ had no reason to require a cost analysis for equipment to cool the exhaust stream.

**Catawba Indian Nation comment:** Requested a BACT review and analysis of particulate matter control equipment for the kiln silos, planer shavings silo, and planer mill.

**BAQ response:** A BACT review for particulate matter for the listed sources was completed and can be found in Sections 5.8 and 5.11 of the application.

**Catawba Indian Nation comment:** Requested further justification of the 5.82 lbs/MBF BACT emissions limitation for the lumber kilns or an analysis demonstrating that the expected wood processed in the proposed RFP lumber mill would match the emissions profile or organic compound (terpene, formaldehyde, methanol) content of the lumber used in the New South Lumber Company PSD construction permit application or in other BACT determinations in the EPA RBLC.

**BAQ response:** In Section 5.6.5 of the application, Resolute states that the lumber mill will process “the identical species of wood” as both the New South Lumber mills in Darlington, SC and Cassatt, SC. These mills are less than 100 miles in distance from one another and will likely pull from the same timberland for lumber processing. Further, all three mills are located in the footprint of “Southern Forest Conifers” which comprise of Southern Yellow

Pine for lumber processing.

**Catawba Indian Nation comment:** Requested a BACT review and analysis for condensable particulate matter control equipment for the kiln.

**BAQ response:** The regulated pollutants include both the filterable and condensable portions of particulate matter. A BACT review was conducted and limits on total particulate matter (filterable and condensable portions) were established.

**Catawba Indian Nation comment:** Requested additional technical and financial support for O<sub>3</sub> and PM<sub>2.5</sub> monitors located on the Reservation.

**BAQ response:** All state, local, and tribal programs have needs for additional funding, training, and technical support for our aging monitoring networks. SCDHEC renewed the Memorandum of Agreement (MOA) with the Catawba Indian Nation on May 12, 2017 (see attached). This MOA commits the Department to continued technical support and the loaning of equipment as needed. EPA Region 4 and SCDHEC will continue to advocate for additional funding, training, and technical support for our air quality monitoring programs. Contact Micheal Mattocks, Director of the Division of Air Quality Analysis, to discuss any further technical support needs.

**EPA comment [Regarding the April 4, 2017 Application]:** Requested additional information on why thermal oxidation is not technically feasible. Also, noted an incomplete sentence in Section 5.5.2.1 of the application.

**BAQ response:** Based on comments received from the BAQ on the original application dated April 4, 2017, the facility updated the BACT review for thermal oxidation. The revised information considered thermal oxidation as technically feasible in Step 2 but was ruled out in later steps of the BACT review as not being cost effective. See the revised application, updated August 17, 2017, that accompanied the public noticed documents.

**EPA comment [Regarding the April 4, 2017 Application]:** Requested clarification of a sentence in Section 5.5.2.2 on why catalytic oxidation is not feasible.

**BAQ response:** The extra wording did make the sentence unclear. The sentence should read “Additionally, the kiln exhaust will contain particulate matter, which would reduce the

effectiveness of the catalyst.” In the revised application, dated August 2017, Resolute detailed for Catalytic Oxidation in Step 3 (Section 5.6.2.4) why particulate matter, moisture loading, variable flows, and concentrations make this control technology technically infeasible.

**EPA comment [Regarding the Statement of Basis]:** Requested a complete regulation citation and additional explanation of the applicability of Standard No. 5.

**BAQ response:** This comment is specific to the draft statement of basis, not the draft construction permit as indicated in the comment. The statement of basis is used to justify permitting decisions made for a project and covers decisions made not clearly required by regulations. The statement of basis is a technical document, mainly for use by individuals familiar with the air permitting process. The document uses commonly understood shorthand for regulatory references. As all South Carolina air regulation “Standards” are codified in SC Regulation 61-62.5, the statement of basis does not include this portion of the citation for the sake of brevity. The full citation for the referenced regulation is SC Regulation 62-62.5, Standard No. 5.

Standard No. 5, Part B. covers the applicability of this regulation. According to Part B, 1., this regulation applies to existing processes statewide.... In Part A, the definition of “existing process” lists the dates when the various Parts became effective; basically July 1, 1979 or July 1, 1980, and says that the process had to be in existence or under construction on the effective date of that Part. In short, Resolute FP US Inc. – Catawba Lumber Mill was not in existence on July 1, 1979 or July 1, 1980, so this regulation does not apply. There are no provisions in this regulation for new sources. Standard No. 5 existed to capture sources that were are not subject to PSD, NSPS, or other Federal regulations that came into existence after the applicability dates of Standard No. 5.

#### 4.0 Final Determination

The final BACT Determinations are summarized in Table 2.

<b>Table 2 – Summary of BACT</b>			
<b>Process</b>	<b>Pollutant</b>	<b>BACT Limit</b>	<b>Control Method</b>
Debarking and Log Sawing	Filterable PM	1.0E-03 lb/ton material removed, each	Enclosure of operations and proper maintenance and good operating practices
	Filterable PM <sub>10</sub>	3.8E-04 lb/ton material removed, each	
	Filterable PM <sub>2.5</sub>	1.53E-04 lb/ton material removed, each	
3 Continuous, Direct-Fired Lumber Kilns	Total PM	0.14 lb/MBF	Proper maintenance and good operating practices
	Total PM <sub>10</sub>	0.104 lb/MBF	
	Total PM <sub>2.5</sub>	0.099 lb/MBF	
	VOC	5.82 lb/MBF	Work Practice Standards
	CO	0.73 lb/MBF	Proper maintenance and good operating practices
	CO <sub>2</sub>	206.79 lb/million Btu	Use of energy efficient design
	CH <sub>4</sub>	1.59E-02 lb/million Btu	
N <sub>2</sub> O	7.94E-03 lb/million Btu		
Startup emissions from the three Kilns	Total PM	2.83 lb/ton wood combusted	Good combustion practices
	Total PM <sub>10</sub>	2.70 lb/ton wood combusted	
	Total PM <sub>2.5</sub>	2.22 lb/ton wood combusted	
3 Kiln Fuel Silos	Filterable PM	0.01 gr/dscf, each silo	Proper maintenance and good operating practices, to include inherent cyclones
	Filterable PM <sub>10</sub>	0.0035 gr/dscf, each silo	
	Filterable PM <sub>2.5</sub>	0.0011 gr/dscf, each silo	
Planer Mill Shavings Silo	Filterable PM	0.002 gr/dscf, each silo	Proper maintenance and good operating practices, to include inherent bin vent filter
	Filterable PM <sub>10</sub>	0.0007 gr/dscf, each silo	
	Filterable PM <sub>2.5</sub>	0.00022 gr/dscf, each silo	
Planer Mill	Filterable PM	99% reduction as measured by total PM	Fabric Filtration – baghouse and proper maintenance and good operating practices
	Filterable PM <sub>10</sub>	99% reduction as measured by total PM	
	Filterable PM <sub>2.5</sub>	99% reduction as	

<b>Table 2 – Summary of BACT</b>			
<b>Process</b>	<b>Pollutant</b>	<b>BACT Limit</b>	<b>Control Method</b>
		measured by total PM	
Material Transfer	Filterable PM	1.16E-03 lb/ton	Proper maintenance and good operating practices
	Filterable PM <sub>10</sub>	5.47E-04 lb/ton	
	Filterable PM <sub>2.5</sub>	8.29E-05 lb/ton	
Paved Roads	Filterable PM	0.13 lb/VMT	Good housekeeping practices
	Filterable PM <sub>10</sub>	0.03 lb/VMT	
	Filterable PM <sub>2.5</sub>	0.01 lb/VMT	

## **Appendix A – Construction Permit No. 2440-0216-CA**



## **Bureau of Air Quality PSD Construction Permit**

**Resolute FP US Inc. – Catawba Lumber Mill  
5300 Cureton Ferry Road  
Catawba, South Carolina 29704  
York County**

Pursuant to the provisions of the *Pollution Control Act*, Sections 48-1-50(5) and 48-1-110(a), the 1976 *Code of Laws of South Carolina*, as amended, and *South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards*, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on March 3, 2017, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

**Permit Number: 2440-0216-CA**  
**Issue Date: November 3, 2017**

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**Steve McCaslin, P. E., Director  
Engineering Services Division  
Bureau of Air Quality**

## Resolute FP US Inc. – Catawba Lumber Mill

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### A. PROJECT DESCRIPTION

Permission is hereby granted to construct a lumber mill that will be co-located with the existing Resolute Forest Product US Inc. pulp and paper mill (TV-2440-0005) at the Catawba Facility. The project includes the installation of a log pile, sawmill, debarker, three (3) continuous dual-path direct-fired lumber kilns, a planer mill, and ancillary equipment. The direct-fired kilns will combust gasified green sawdust and chip fines, and will each be rated at 35 million British thermal units per hour (MMBtu/hr). The lumber mill will have a potential throughput of 312.5 million board feet of finished lumber per year (MMBF/yr). Emission sources will include the sawmill, the debarker, the direct-fired kilns (including startup emissions), kiln fuel silos with inherent cyclones, the planer mill with cyclones controlled by a baghouse, planer shavings storage silo and bins that are equipped with bin vent filters, and truck and forklift traffic, as well as material handling between sources.

### B.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
<b>Emission Unit ID 01 - Sawmill</b>			
DB	Debarking	None	FUG-DB
SW	Log Sawing	None	FUB-SW
<b>Emission Unit ID 02 – Lumber Kilns</b>			
CDK1	35 million Btu/hr Continuous Direct-Fired Lumber Kiln, with maximum throughput of 104.17 million BF/yr, fired on gasified green sawdust and fine chips	None	FUG-CDK1
CDK2	35 million Btu/hr Continuous Direct-Fired Lumber Kiln, with maximum throughput of 104.17 million BF/yr, fired on gasified green sawdust and fine chips	None	FUG-CDK2
CDK3	35 million Btu/hr Continuous Direct-Fired Lumber Kiln, with maximum throughput of 104.17 million BF/yr, fired on gasified green sawdust and fine chips	None	FUG-CDK3
KFS-1	Kiln Fuel Silo #1 with inherent Cyclone (C-001)	None	EP-001
KFS-2	Kiln Fuel Silo #2 with inherent Cyclone (C-002)	None	EP-002
KFS-3	Kiln Fuel Silo #3 with inherent Cyclone (C-003)	None	EP-003
<b>Emission Unit ID 03 – Planer Mill</b>			
PM	Planer Mill includes trim saw, planer, and bins. Two cyclones are used to collect byproducts for sale.	BF-004	EP-004
PSS	Dry Shavings Storage Silo, with inherent Bin Vent (BF-005)	None	EP-005
DH	Dry Hog venting to Dry Shavings Storage Silo (PSS)	None	EP-005
<b>Emission Unit ID 04 – Material Transfer</b>			
MT1	Chip Truck Loading	None	FUG-MT1
MT2	Bark Truck Loading	None	FUG-MT2
MT3	Shavings Truck Loading	None	FUG-MT3
MT4	Chips from Hog to Conveyor	None	FUG-MT4

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**B.1 EQUIPMENT**

<b>Equipment ID</b>	<b>Equipment Description</b>	<b>Control Device ID</b>	<b>Emission Point ID</b>
MT5	Chips Transfer to Pile	None	FUG-MT5
MT6	Bark Transfer to Conveyor	None	FUG-MT6
MT7	Bark Transfer to Pile	None	FUG-MT7
<b>Emission Unit ID 05 - Roads</b>			
ROAD	Paved Roads	None	FUG-ROAD

**B.2 CONTROL DEVICES**

<b>Control Device ID</b>	<b>Control Device Description</b>	<b>Pollutants Controlled</b>
BF-004	Planer Mill Baghouse	PM, PM <sub>10</sub> , PM <sub>2.5</sub>

**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
C.1	<p><b>Emission Unit ID:</b> All  <b>Equipment ID:</b> All  <b>Control Device ID:</b> All</p> <p>(S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.</p>
C.2	<p><b>Emission Unit ID:</b> 02, 03  <b>Equipment ID:</b> KFS-1, KFS-2, KFS-3, PM, PSS,  <b>Control Device ID:</b> BF-004</p> <p>The owner/operator shall inspect, calibrate, adjust, and maintain continuous monitoring systems, monitoring devices, and gauges in accordance with manufacturer’s specifications or good engineering practices. The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.</p>

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions
C.3	<p><b>Emission Unit ID:</b> 02, 03  <b>Equipment ID:</b> : KFS-1, KFS-2, KFS-3, PM, PSS  <b>Control Device ID:</b> BF-004</p> <p>All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such.</p> <p>Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.70.7.</p>
C.4	<p><b>Emission Unit ID:</b> Facility Wide  <b>Equipment ID:</b> All  <b>Control Device ID:</b> All</p> <p>(S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from these sources (including fugitive emissions) shall not exhibit an opacity greater than 20%, each.</p>
C.5	<p><b>Emission Unit ID:</b> Facility Wide  <b>Equipment ID:</b> DB, SW, MT1, MT2, MT3, MT4, MT5, MT6, MT7, ROAD</p> <p>(S.C. Regulation 6-62.5, Standard No. 4, Section X) All non-enclosed operations shall be conducted in such a manner that a minimum of particulate matter becomes airborne. In no case shall established ambient air quality standards be exceeded at or beyond the property line. The owner/operator of all such operations shall maintain dust control on the premises and any roadway owned or controlled by the owner/operator by paving or other suitable measures. Oil treatment is prohibited.</p>
C.6	<p><b>Emission Unit IDs:</b> All  <b>Equipment ID:</b> All  <b>Control Device ID:</b> All</p> <p>(S.C. Regulation 61-62.5, Standard No. 4, Section VIII) Particulate matter emissions from a process shall be limited to the rate specified by use of the following equations:</p> <p>1) when process weight rates are less than or equal to 30 tons per hour:  <math display="block">E = (F) 4.10P^{0.67}</math></p> <p>or 2) when process weight rates are greater than 30 tons per hour:  <math display="block">E = (F) 55.0P^{0.11} - 40</math></p>

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions										
	<p>where E = the allowable emission rate in pounds per hour, P = process weight rate in tons per hour, and F = effect factor from Table B in S.C. Regulation 61-62.5, Standard No. 4. For the purposes of compliance with this condition, the process boundaries are defined as follows:</p> <table border="1" data-bbox="506 554 1294 701"> <thead> <tr> <th data-bbox="509 554 902 627">Emission Unit ID, Equipment ID / Process</th> <th data-bbox="902 554 1291 627">Max. Process Weight Rate (tons/hr)</th> </tr> </thead> <tbody> <tr> <td data-bbox="509 627 902 701">Facility Wide, Emission Unit IDs 01, 02, 03, 04</td> <td data-bbox="902 627 1291 701">250 (logs)</td> </tr> </tbody> </table>	Emission Unit ID, Equipment ID / Process	Max. Process Weight Rate (tons/hr)	Facility Wide, Emission Unit IDs 01, 02, 03, 04	250 (logs)						
Emission Unit ID, Equipment ID / Process	Max. Process Weight Rate (tons/hr)										
Facility Wide, Emission Unit IDs 01, 02, 03, 04	250 (logs)										
C.7	<p><b>Emission Unit ID:</b> 01 <b>Equipment ID:</b> DB, SW</p> <p>S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the Debarker and Sawmill has been determined to be enclosure of the operations, along with proper maintenance and good operating practices.</p> <table border="1" data-bbox="300 991 1503 1253"> <thead> <tr> <th data-bbox="303 991 615 1031">Pollutant</th> <th data-bbox="615 991 1114 1031">BACT Limit</th> <th data-bbox="1114 991 1500 1031">Control Method</th> </tr> </thead> <tbody> <tr> <td data-bbox="303 1031 615 1104">Filterable PM</td> <td data-bbox="615 1031 1114 1104">1.0E-03 lb/ton material removed, each</td> <td data-bbox="1114 1031 1500 1253" rowspan="3">Enclosure of operations and proper maintenance and good operating practices</td> </tr> <tr> <td data-bbox="303 1104 615 1178">Filterable PM<sub>10</sub></td> <td data-bbox="615 1104 1114 1178">3.8E-04 lb/ton material removed, each</td> </tr> <tr> <td data-bbox="303 1178 615 1253">Filterable PM<sub>2.5</sub></td> <td data-bbox="615 1178 1114 1253">1.53E-04 lb/ton material removed, each</td> </tr> </tbody> </table> <p>The owner or operator shall perform a visual inspection of the debarking and log sawing enclosure on a weekly basis during source operation. The owner or operator shall ensure that proper maintenance on the enclosure and equipment is performed in a timely manner and that good operating practices of the equipment are followed to minimize fugitive emissions. Logs shall be kept to record all visual inspections, noting color, duration, density (heavy or light), cause, and corrective action taken for any abnormal emissions. If a source did not operate during the required visual inspection time frame, the log shall indicate such. Logs of the maintenance performed on the equipment and enclosure shall be kept to record all maintenance performed noting date, and corrective actions taken. The owner/operator shall submit semiannual reports. The report shall include records of abnormal emissions, if any, maintenance performed, if any, and corrective actions taken. If the unit did not operate during the semiannual report, the report shall state so.</p> <p>Visual inspection means a qualitative observation of opacity during daylight hours. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water.</p>	Pollutant	BACT Limit	Control Method	Filterable PM	1.0E-03 lb/ton material removed, each	Enclosure of operations and proper maintenance and good operating practices	Filterable PM <sub>10</sub>	3.8E-04 lb/ton material removed, each	Filterable PM <sub>2.5</sub>	1.53E-04 lb/ton material removed, each
Pollutant	BACT Limit	Control Method									
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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions														
C.8	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p>(S.C. Regulation 61-62.5, Standard No. 5.2, Section III) The allowable discharge of NOx resulting from these sources is 0.154 lb/million Btu, each.</p> <p>(S.C. Regulation 61-62.5, Standard No. 5.2, Section IV) The owner or operator shall perform tune-ups every twenty-four (24) months in accordance with manufacturer’s specifications or with good engineering practices. The first tune-up shall be conducted no more than twenty-four (24) months from replacement of a burner assembly for affected existing sources. Each subsequent tune-up shall be conducted no more than twenty-four (24) months after the previous tune-up.</p> <p>All tune-up records are required to be maintained on site and available for inspection by the Department for a period of five (5) years from the date generated.</p> <p>The owner or operator shall develop and retain a tune-up plan on file.</p>														
C.9	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p>(S.C. Regulation 61-62.5, Standard No. 5.2, Section IV) The owner or operator shall record monthly the amounts and types of each fuel combusted by the affected sources and maintain these records on site.</p> <p>The owner or operator shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected source; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.</p>														
C.10	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p>(S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the three continuous, direct-fired lumber kilns has been determined to be work practice standards, along with proper maintenance and good operating practices.</p> <table border="1" data-bbox="285 1640 1520 1797"> <thead> <tr> <th>Pollutant</th> <th>BACT Limit</th> <th>Averaging Period</th> <th>Control Method</th> </tr> </thead> <tbody> <tr> <td>CO<sub>2</sub></td> <td>206.79 lb/million Btu</td> <td>3-hour average</td> <td rowspan="3">Use of energy efficient design</td> </tr> <tr> <td>CH<sub>4</sub></td> <td>1.59E-02 lb/million Btu</td> <td>3-hour average</td> </tr> <tr> <td>N<sub>2</sub>O</td> <td>7.94E-03 lb/million Btu</td> <td>3-hour average</td> </tr> </tbody> </table> <p>The owner or operator shall record monthly the amounts and types of each fuel combusted by the affected sources and maintain these records on site.</p>	Pollutant	BACT Limit	Averaging Period	Control Method	CO <sub>2</sub>	206.79 lb/million Btu	3-hour average	Use of energy efficient design	CH <sub>4</sub>	1.59E-02 lb/million Btu	3-hour average	N <sub>2</sub> O	7.94E-03 lb/million Btu	3-hour average
Pollutant	BACT Limit	Averaging Period	Control Method												
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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions																						
C.11	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p>(S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the three continuous, direct-fired lumber kilns has been determined to be work practice standards, along with proper maintenance and good operating practices.</p>																						
	<table border="1"> <thead> <tr> <th data-bbox="280 699 537 737">Pollutant</th> <th data-bbox="537 699 927 737">BACT Limit</th> <th data-bbox="927 699 1203 737">Averaging Period</th> <th data-bbox="1203 699 1524 737">Control Method</th> </tr> </thead> <tbody> <tr> <td data-bbox="280 737 537 774">Total PM</td> <td data-bbox="537 737 927 774">0.14 lb/MBF</td> <td data-bbox="927 737 1203 774">3-hour average</td> <td data-bbox="1203 737 1524 854" rowspan="3">Proper maintenance and good operating practices</td> </tr> <tr> <td data-bbox="280 774 537 812">Total PM<sub>10</sub></td> <td data-bbox="537 774 927 812">0.104 lb/MBF</td> <td data-bbox="927 774 1203 812">3-hour average</td> </tr> <tr> <td data-bbox="280 812 537 850">Total PM<sub>2.5</sub></td> <td data-bbox="537 812 927 850">0.099 lb/MBF</td> <td data-bbox="927 812 1203 850">3-hour average</td> </tr> <tr> <td data-bbox="280 850 537 930">VOC</td> <td data-bbox="537 850 927 930">5.82 lb/MBF (as terpene + methanol + formaldehyde).</td> <td data-bbox="927 850 1203 930">3-hour average</td> <td data-bbox="1203 850 1524 930">Work Practice Standards</td> </tr> <tr> <td data-bbox="280 930 537 1033">CO</td> <td data-bbox="537 930 927 1033">0.73 lb/MBF</td> <td data-bbox="927 930 1203 1033">3-hour average</td> <td data-bbox="1203 930 1524 1033">Proper maintenance and good operating practices</td> </tr> </tbody> </table>	Pollutant	BACT Limit	Averaging Period	Control Method	Total PM	0.14 lb/MBF	3-hour average	Proper maintenance and good operating practices	Total PM <sub>10</sub>	0.104 lb/MBF	3-hour average	Total PM <sub>2.5</sub>	0.099 lb/MBF	3-hour average	VOC	5.82 lb/MBF (as terpene + methanol + formaldehyde).	3-hour average	Work Practice Standards	CO	0.73 lb/MBF	3-hour average	Proper maintenance and good operating practices
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	CO	0.73 lb/MBF	3-hour average	Proper maintenance and good operating practices																			
	<p>The maximum throughput of these three lumber kilns combined is permitted at 312.5 million bd-ft/yr of lumber. The owner/operator must record the actual monthly production rates and calculate the yearly production rate each month on a 12-month rolling sum basis. Semiannual reports, including all recorded parameters and calculated values shall be submitted.</p>																						
	<p>The owner/operator shall maintain records of all volatile organic compounds (VOC) emissions. These records shall include any documentation necessary to determine VOC emissions. VOC emissions shall be calculated on a monthly basis and a twelve-month rolling sum shall be calculated for total VOC emissions. Reports of the calculated values shall be submitted semiannually. An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall be included in the initial report. Subsequent submittals of the algorithm and example calculations are unnecessary, unless the method of calculation is found to be unacceptable by the Bureau or if the facility changes the method of calculating emissions and/or changes emission factors.</p>																						
<p><b>Work Practice Standards:</b></p>																							
<p>1. The lumber kiln drying operation target final moisture content will be 12% or greater.</p>																							
<p>2. The lumber kilns will be operated following a dry-bulb temperature set-point drying schedule with a lower limit temperature (system will pause). The set point temperature and lower limit temperature shall be developed based on manufacturer's recommendations and operational history within 180 days of startup. A maximum operating temperature at which a corrective action shall be taken shall also be determined.</p>																							
<p>3. Routines for planned maintenance will be as detailed in a monitoring plan based on manufacturer's</p>																							

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions
	<p>recommendations or at least the minimum:</p> <p><b>Daily Routine:</b></p> <ul style="list-style-type: none"> <li>• Ensure all Resistance Temperature Detectors (RTDs) are working and placed in the right location.</li> <li>• Check lumber entrance/exit baffles for placement and damage and report problems in writing to the maintenance department.</li> <li>• Check kiln controls to confirm alarms are functioning properly.</li> <li>• Check motors and couplings on the system.</li> <li>• Check amp meters and indicator lights on pre-wired fan system.</li> <li>• Check air compressor for proper operation and pressure and leaks.</li> </ul> <p><b>Weekly Routine:</b></p> <ul style="list-style-type: none"> <li>• Drain water from transducers and air supplies.</li> </ul> <p><b>Monthly Routine:</b></p> <ul style="list-style-type: none"> <li>• Check bearing and bolts external to kiln.</li> <li>• Grease fan bearing inside kiln (via external lubrication points).</li> <li>• Check flash tank for leaks.</li> <li>• Check condensate pump bearings and couplings.</li> <li>• Grease kiln car wheels if bearings, inspect plastic if UHMW bushings.</li> <li>• Maintain proper operation of the control room’s air conditioning/heater to provide appropriate temperature for electrical components.</li> </ul> <p><b>Quarterly Routine:</b></p> <ul style="list-style-type: none"> <li>• Clean tracks through kilns.</li> <li>• Inspect fans, bearings, and shafts.</li> <li>• Check internal baffles for damage and report problems in writing to the Maintenance Department.</li> <li>• Inspect kiln walls and structure for deterioration.</li> <li>• Check for leaks at fittings, coil units, hand valves, control valves, traps, check valves, and strainers.</li> <li>• Check pusher system for proper operation, hydraulic leaks, and electrical connections.</li> </ul> <p><b>Semi-Annually:</b></p> <ul style="list-style-type: none"> <li>• Check for loose connections on electrical wires and RTDs.</li> <li>• Stroke all steam valves.</li> <li>• Inspect kiln building and foundation for damage and repair.</li> <li>• Check air compressor and all air operated parts.</li> </ul> <p><b>Annually:</b></p>

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
	<ul style="list-style-type: none"> <li>• Check calibration of all transducers, valves, and vent control.</li> <li>• Check fan bearing taper lock for looseness or excessive wear.</li> <li>• Inspect all steam traps, repair or replace as needed.</li> <li>• Kiln operation control equipment will be calibrated as per manufacturer’s specifications or other method approved by the Bureau of Air Quality.</li> </ul> <p><b>Recordkeeping:</b></p> <p>1. Records shall be kept for each day the kilns are in operation. These records will contain, as a minimum, the date, dry-bulb actual (daily average, 24-hr block) and set-point temperature.</p> <p>2. For each visual inspection, a log book will contain the date, the initials of the personnel conducting the inspection, results of the inspection, documentation of any maintenance performed, and any calibration performed on the kiln operation control equipment.</p> <p><b>Reporting:</b></p> <p>A semiannual report shall be submitted that documents any exceedance of work practice standards, including date and time, cause, and corrective action taken. If no incidences occurred during the reporting period then a letter shall indicate such.</p>
C.12	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> KFS-1, KSF-2, KFS-3</p> <p><b>Emission Unit ID:</b> 03  <b>Equipment ID:</b> PSS</p> <p>The owner/operator shall perform a visual inspection on a semiannual basis during source operation. Logs shall be kept to record all visual inspections, noting color, duration, density (heavy or light), cause, and corrective action taken for any abnormal emissions. If a source did not operate during the required visual inspection time frame, the log shall indicate such. The owner/operator shall submit semiannual reports. The report shall include records of abnormal emissions, if any, and corrective actions taken. If the unit did not operate during the semiannual period, the report shall state so.</p> <p>Visual inspection means a qualitative observation of opacity during daylight hours. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water.</p>
C.13	<p><b>Emission Unit ID:</b> 02  <b>Equipment ID:</b> KFS-1, KSF-2, KFS-3</p> <p>(S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the three Kiln Fuel Silos, each with an inherent cyclone, has been determined to be proper maintenance and good operating practices. The manufacturer’s</p>

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions														
	<p>guarantee shall be provided to the Department at least 30 days prior to startup of operations.</p> <table border="1" data-bbox="285 480 1520 667"> <thead> <tr> <th>Pollutant</th> <th>BACT Limit</th> <th>Averaging Period</th> <th>Control Method</th> </tr> </thead> <tbody> <tr> <td>Filterable PM</td> <td>0.01 gr/dscf, each silo</td> <td>3-hour average</td> <td rowspan="3">Proper maintenance and good operating practices, including inherent cyclones</td> </tr> <tr> <td>Filterable PM<sub>10</sub></td> <td>0.0035 gr/dscf, each silo</td> <td>3-hour average</td> </tr> <tr> <td>Filterable PM<sub>2.5</sub></td> <td>0.0011 gr/dscf, each silo</td> <td>3-hour average</td> </tr> </tbody> </table> <p>As good operating practices, each cyclone shall be in place and operational whenever processes venting to each cyclone are running. The following operating and maintenance checks will be made on at least a weekly basis for all cyclones:</p> <ul style="list-style-type: none"> <li>• Check each cyclone and ductwork system for damaged or worn sheet metal or other interferences with proper operation.</li> <li>• Check dust collection hoppers and conveying systems for proper operation.</li> </ul> <p>The results from the operation and maintenance checks shall be maintained in logs (written or electronic), along with any corrective action taken.</p>	Pollutant	BACT Limit	Averaging Period	Control Method	Filterable PM	0.01 gr/dscf, each silo	3-hour average	Proper maintenance and good operating practices, including inherent cyclones	Filterable PM <sub>10</sub>	0.0035 gr/dscf, each silo	3-hour average	Filterable PM <sub>2.5</sub>	0.0011 gr/dscf, each silo	3-hour average
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C.14	<p><b>Emission Unit ID:</b> 03 <b>Equipment ID:</b> PSS</p> <p>(S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the Planer Mill Shavings Silo with an inherent bin vent has been determined to be proper maintenance and good operating practices.</p> <table border="1" data-bbox="285 1281 1520 1467"> <thead> <tr> <th>Pollutant</th> <th>BACT Limit</th> <th>Averaging Period</th> <th>Control Method</th> </tr> </thead> <tbody> <tr> <td>Filterable PM</td> <td>0.002 gr/dscf, each silo</td> <td>3-hour average</td> <td rowspan="3">Proper maintenance and good operating practices, including inherent bin vent filter</td> </tr> <tr> <td>Filterable PM<sub>10</sub></td> <td>0.0007 gr/dscf, each silo</td> <td>3-hour average</td> </tr> <tr> <td>Filterable PM<sub>2.5</sub></td> <td>0.00022 gr/dscf, each silo</td> <td>3-hour average</td> </tr> </tbody> </table> <p>As a good operating practice, operation and maintenance checks shall be made on at least a weekly basis for bin vent filter cleaning systems, dust collection hoppers, and conveying systems for proper operation. The results from the operation and maintenance checks shall be maintained in logs (written or electronic), along with any corrective actions. The inherent bin vent filter shall be in place and operational whenever processes controlled by it are running, except during periods of bin vent filter malfunction or mechanical failure.</p>	Pollutant	BACT Limit	Averaging Period	Control Method	Filterable PM	0.002 gr/dscf, each silo	3-hour average	Proper maintenance and good operating practices, including inherent bin vent filter	Filterable PM <sub>10</sub>	0.0007 gr/dscf, each silo	3-hour average	Filterable PM <sub>2.5</sub>	0.00022 gr/dscf, each silo	3-hour average
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C.15	<p><b>Emission Unit ID:</b> 03 <b>Equipment ID:</b> PM <b>Control Device ID:</b> BF-004</p> <p>(S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC</p>														

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions														
	<p>Regulation 61-62.5, Standard No. 7. BACT for the Planer Mill has been determined to be the use of a baghouse, along with proper maintenance and good operating practices. The manufacturer’s guarantee shall be provided to the Department at least 30 days prior to startup of operations.</p> <table border="1" data-bbox="285 554 1520 739"> <thead> <tr> <th>Pollutant</th> <th>BACT Limit</th> <th>Averaging Period</th> <th>Control Method</th> </tr> </thead> <tbody> <tr> <td>Filterable PM</td> <td>99% control efficiency</td> <td>3-hour average</td> <td rowspan="3">Fabric Filtration – baghouse and proper maintenance and good operating practices</td> </tr> <tr> <td>Filterable PM<sub>10</sub></td> <td>99% control efficiency</td> <td>3-hour average</td> </tr> <tr> <td>Filterable PM<sub>2.5</sub></td> <td>99% control efficiency</td> <td>3-hour average</td> </tr> </tbody> </table> <p>(S.C. Regulation 61-62.5, Standard No. 7) An initial source test on the Planer Mill Baghouse to show compliance with the PM BACT limits shall be conducted within 180 days after initial startup. Future source testing may be required if any of the design or operating parameters change. The source test will be used to verify the control efficiency of filterable PM.</p> <p>The owner/operator shall install, operate, and maintain pressure drop gauges on the Planer Mill Baghouse. Pressure drop readings shall be recorded hourly during source operation. Operation and maintenance checks shall be made on at least a weekly basis for baghouse cleaning systems, dust collection hoppers, and conveying systems for proper operation. The results from the operation and maintenance checks shall be maintained in logs (written or electronic), along with any corrective actions. The baghouse filter shall be in place and operational whenever processes controlled by it are running, except during periods of baghouse malfunction or mechanical failure.</p> <p>Operational ranges for the monitored parameters shall be established to ensure proper operation of the pollution control equipment. These operational ranges for the monitored parameters shall be derived from stack test data, vendor certification, and/or operational history and visual inspections, which demonstrate the proper operation of the equipment. These ranges and supporting documentation (certification from manufacturer, stack test results, 30 days of normal readings, opacity readings, etc.) shall be submitted to the Director of Engineering Services within 180 days of startup. Operating ranges may be updated following submittal to the Department.</p>	Pollutant	BACT Limit	Averaging Period	Control Method	Filterable PM	99% control efficiency	3-hour average	Fabric Filtration – baghouse and proper maintenance and good operating practices	Filterable PM <sub>10</sub>	99% control efficiency	3-hour average	Filterable PM <sub>2.5</sub>	99% control efficiency	3-hour average
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C.16	<p><b>Emission Unit ID:</b> 04  <b>Equipment ID:</b> MT1, MT2, MT3, MT4, MT5, MT6, MT7</p> <p>S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the Material Handling has been determined to be the proper maintenance and good operating practices.</p> <table border="1" data-bbox="328 1751 1477 1864"> <thead> <tr> <th>Pollutant</th> <th>BACT Limit</th> <th>Control Method</th> </tr> </thead> <tbody> <tr> <td>Filterable PM</td> <td>1.16E-03 lb/ton</td> <td rowspan="2">Proper maintenance and good operating practices</td> </tr> <tr> <td>Filterable PM<sub>10</sub></td> <td>5.47E-04 lb/ton</td> </tr> </tbody> </table>	Pollutant	BACT Limit	Control Method	Filterable PM	1.16E-03 lb/ton	Proper maintenance and good operating practices	Filterable PM <sub>10</sub>	5.47E-04 lb/ton						
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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions										
	<table border="1" data-bbox="329 411 1476 449"> <tr> <td data-bbox="329 411 643 449">Filterable PM<sub>2.5</sub></td> <td data-bbox="643 411 1081 449">8.29E-05 lb/ton</td> <td data-bbox="1081 411 1476 449"></td> </tr> </table> <p data-bbox="285 491 1523 884">The owner or operator shall perform a visual inspection of the Material Handling operations on a weekly basis during source operation. The owner or operator shall ensure that proper maintenance on the conveyors and equipment is performed in a timely manner and that good operating practices of the equipment are followed to minimize fugitive emissions. Logs shall be kept to record all visual inspections, noting color, duration, density (heavy or light), cause, and corrective action taken for any abnormal emissions. If a source did not operate during the required visual inspection time frame, the log shall indicate such. Logs of the maintenance performed on the equipment and enclosure shall be kept to record all maintenance performed noting date, and corrective actions taken. The owner/operator shall submit semiannual reports. The report shall include records of abnormal emissions, if any, maintenance performed, if any, and corrective actions taken. If the unit did not operate during the semiannual report, the report shall state so.</p> <p data-bbox="285 926 1523 1094">Visual inspection means a qualitative observation of opacity during daylight hours. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water.</p>	Filterable PM <sub>2.5</sub>	8.29E-05 lb/ton								
Filterable PM <sub>2.5</sub>	8.29E-05 lb/ton										
C.17	<p data-bbox="285 1104 553 1171"><b>Emission Unit ID:</b> 05 <b>Equipment ID:</b> ROAD</p> <p data-bbox="285 1213 1523 1283">S.C. Regulation 61-62.5, Standard No. 7) This project is a major modification as defined in SC Regulation 61-62.5, Standard No. 7. BACT for the Paved Roads is housekeeping practices.</p> <table border="1" data-bbox="370 1318 1433 1476"> <thead> <tr> <th data-bbox="370 1318 651 1356">Pollutant</th> <th data-bbox="651 1318 1086 1356">BACT Limit</th> <th data-bbox="1086 1318 1433 1356">Control Method</th> </tr> </thead> <tbody> <tr> <td data-bbox="370 1356 651 1394">Filterable PM</td> <td data-bbox="651 1356 1086 1394">0.13 lb/VMT</td> <td data-bbox="1086 1356 1433 1476" rowspan="3">Good housekeeping practices</td> </tr> <tr> <td data-bbox="370 1394 651 1432">Filterable PM<sub>10</sub></td> <td data-bbox="651 1394 1086 1432">0.03 lb/VMT</td> </tr> <tr> <td data-bbox="370 1432 651 1476">Filterable PM<sub>2.5</sub></td> <td data-bbox="651 1432 1086 1476">0.01 lb/VMT</td> </tr> </tbody> </table> <p data-bbox="285 1518 1523 1619">The owner or operator shall sweep the roads on a monthly basis in order to remove debris from the roads to minimize fugitive particulate emissions. The sweeping events shall be recorded in logs and maintained on site.</p>	Pollutant	BACT Limit	Control Method	Filterable PM	0.13 lb/VMT	Good housekeeping practices	Filterable PM <sub>10</sub>	0.03 lb/VMT	Filterable PM <sub>2.5</sub>	0.01 lb/VMT
Pollutant	BACT Limit	Control Method									
Filterable PM	0.13 lb/VMT	Good housekeeping practices									
Filterable PM <sub>10</sub>	0.03 lb/VMT										
Filterable PM <sub>2.5</sub>	0.01 lb/VMT										
C.18	<p data-bbox="285 1625 672 1656"><b>Emission Unit ID:</b> Facility Wide</p> <p data-bbox="285 1698 1523 1873">(S.C. Regulation 61-62.5, Standard No. 4) All non-enclosed operations shall be conducted in such a manner that a minimum of particulate matter becomes airborne. In no case shall established ambient air quality standards be exceeded at or beyond the property line. The owner/operator of all such operations shall maintain dust control on the premises and any roadway owned or controlled by the owner/operator by paving or other suitable measures. Oil treatment is prohibited</p>										

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**C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS**

Condition Number	Conditions
C.19	<p><b>Emission Unit ID:</b> Facility Wide</p> <p>(S.C. Regulation 61-62.6) Fugitive particulate matter (PM) emissions from material handling, process equipment, control equipment, or storage piles will be minimized to the maximum extent possible. This will include proper maintenance of the control system such as scheduled inspections, replacement of damaged or worn parts, etc. Fugitive emissions from dust buildup will be controlled by proper housekeeping and/or wet suppression.</p>
C.20	<p><b>Emission Unit ID:</b> 03  <b>Equipment ID:</b> PM  <b>Control Device ID:</b> BF-004</p> <p>For any source test required under an applicable standard or permit condition, the owner, operator, or representative shall comply with S.C. Regulation 61-62.1, Section IV - Source Tests.</p> <p>Unless approved otherwise by the Department, the owner, operator, or representative shall ensure that source tests are conducted while the source is operating at the maximum expected production rate or other production rate or operating parameter which would result in the highest emissions for the pollutants being tested. Some sources may have to spike fuels or raw materials to avoid being subjected to a more restrictive feed or process rate. Any source test performed at a production rate less than the rated capacity may result in permit limits on emission rates, including limits on production if necessary.</p> <p>The owner or operator shall comply with any limits that result from conducting a source test at less than rated capacity. A copy of the most recent Department issued source test summary letter, whether it imposes a limit or not, shall be maintained with the operating permit, for each source that is required to conduct a source test.</p> <p>Site-specific test plans and amendments, notifications, and source test reports shall be submitted to the Manager of the Source Evaluation Section, Bureau of Air Quality.</p>

**D. NESHAP PERIODIC REPORTING SCHEDULE SUMMARY**

NESHAP Part	NESHAP Subpart	Compliance Monitoring Report Submittal Frequency	Reporting Period	Report Due Date
63	DDDD	Semi-Annual	January 1 through June 30 July 1 through December 31	July 31 <sup>st</sup> January 31 <sup>st</sup>

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- |   |
|---|
| <p>1. This table summarizes only the periodic compliance reporting schedule. Additional reports may be required. See specific NESHAP Subpart for additional reporting requirements and associated schedule.</p> <p>2. This reporting schedule does not supersede any other reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, and/or Title V. The MACT reporting schedule may be adjusted to coincide with the Title V reporting schedule with prior approval from the Department in accordance with 40 CFR 63.10(a)(5). This request may be made 1 year after the compliance date for the associated MACT standard.</p> |
|---|

**E. NESHAP – CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
E.1	All NESHAP notifications and reports shall be sent to the Manager of the Air Toxics Section, South Carolina Department of Health and Environmental Control - Bureau of Air Quality.
E.2	<p>All NESHAP notifications and the cover letter to periodic reports shall be sent to the United States Environmental Protection Agency (US EPA) at the following address or electronically as required by the specific subpart:</p> <p align="center"><b>US EPA, Region 4 Air, Pesticides and Toxics Management Division 61 Forsyth Street SW Atlanta, GA 30303</b></p>
E.3	<p><b>Emission Unit ID:</b> 02 <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p>This facility has processes subject to the provisions of S.C. Regulation 61-62.63 and 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and DDDD - Plywood and Composite Wood Products. Existing affected sources shall be in compliance with the requirement of these Subparts by the compliance date, unless otherwise noted. Any new affected sources shall comply with the requirement of these Subparts upon initial start-up unless otherwise noted.</p>
E.4	<p><b>Emission Unit ID:</b> 02 <b>Equipment ID:</b> CDK1, CDK2, CDK3</p> <p><b>40 CFR §63.2252 What Are The Requirements For Process Units That Have No Control Or Work Practice Requirements?</b></p> <p>For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b).</p>

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**F. AMBIENT AIR STANDARDS REQUIREMENTS**

Condition Number	Conditions
F.1	<p>Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment - Emission Rates for Ambient Air Standards of this permit. Higher emission rates may be administratively incorporated into Attachment - Emission Rates for Ambient Air Standards of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded.</p> <p>The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified above. This is a State Only enforceable requirement.</p>

**G. PERIODIC REPORTING SCHEDULE**

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30

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**G. PERIODIC REPORTING SCHEDULE**

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source)	Report Due Date
<p>Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.</p>		

**H. REPORTING CONDITIONS**

Condition Number	Conditions
H.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
H.2	<p>All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address:</p> <p align="center"><b>2600 Bull Street Columbia, SC 29201</b></p> <p>The contact information for the local EQC Regional office can be found at: <b><a href="http://www.scdhec.gov">http://www.scdhec.gov</a></b></p>
H.3	The owner/operator shall submit written notification to the Director of Engineering Services of the date construction is commenced, postmarked within 30 days after such date.
H.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
H.5	<p>(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emissions monitors, any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the Department’s local Environmental Quality Control Regional office within 24 hours after the beginning of the occurrence.</p> <p>The owner/operator shall also submit a written report within 30 days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality and shall include, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1. The identity of the stack and/or emission point where the excess emissions occurred;</li> <li>2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions;</li> <li>3. The time and duration of excess emissions;</li> <li>4. The identity of the equipment causing the excess emissions;</li> <li>5. The nature and cause of such excess emissions;</li> <li>6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction;</li> <li>7. The steps taken to limit the excess emissions; and,</li> </ol>

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**H. REPORTING CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
	8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

**I. PERMIT EXPIRATION AND EXTENSION**

<b>Condition Number</b>	<b>Conditions</b>
I.1	(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction: a. is not commenced within 18 months after receipt of such approval; b. is discontinued for a period of 18 months or more; or c. is not completed within a reasonable time as deemed by the Department. The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
I.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

**J. PERMIT TO OPERATE**

<b>Condition Number</b>	<b>Conditions</b>
J.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
J.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
J.3	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation.  Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.
J.4	(S.C. Regulation 61-62.1, Section II.F.3) For sources not yet covered by an effective Title V operating permit, the owner or operator shall submit a written request to the Director of the Engineering

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**J. PERMIT TO OPERATE**

<b>Condition Number</b>	<b>Conditions</b>
	Services for a new or revised operating permit to cover any new, or altered source, postmarked within 15 days after the actual date of initial startup of each new or altered source.  (S.C. Regulation 61-62.70.5.a) The owner or operator shall submit a timely and complete Part 70 permit application within 12 months of startup.

**K. GENERAL CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
K.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
K.2	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator may document an emergency situation through properly signed, contemporaneous operating logs, and other relevant evidence that verify: <ol style="list-style-type: none"><li>1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency;</li><li>2. The permitted source was at the time the emergency occurred being properly operated;</li><li>3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and</li><li>4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</li></ol> <p>This provision is in addition to any emergency or upset provision contained in any applicable requirement.</p>
K.3	(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following: <ol style="list-style-type: none"><li>1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit.</li><li>2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.</li><li>3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.</li><li>4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring</li></ol>

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**K. GENERAL CONDITIONS**

<b>Condition Number</b>	<b>Conditions</b>
	compliance with the permit or applicable requirements.

**L. EMISSIONS INVENTORY REPORTS**

<b>Condition Number</b>	<b>Conditions</b>
L.1	<p>All newly permitted and constructed Title V sources and/or Non-attainment Area Sources shall complete and submit an emissions inventory consistent with the schedule approved pursuant to S.C. Regulation 61-62.1, Section III. These Emissions Inventory Reports shall be submitted to the Manager of the Emissions Inventory Section, Bureau of Air Quality.</p> <p>This requirement notwithstanding, an emissions inventory may be required at any time in order to determine the compliance status of any facility.</p>

## ATTACHMENT - Emission Rates for Ambient Air Standards

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The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see Ambient Air Standards Requirements).

<b>STANDARD NO. 2 – AMBIENT AIR QUALITY STANDARDS EMISSION RATES (LBS/HR)</b>						
Emission Point ID	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	Lead
BL01 – BL40	0.0062	0.0015	--	--	--	--
BR01 – BR16	0.0059	0.0015	--	--	--	--
BRKHOG	0.0137	0.0021	--	--	--	--
BRKPILE	0.0137	0.0021	--	--	--	--
BRKTKLD	0.0078	0.0012	--	--	--	--
CHIPHOG	0.0380	0.0058	--	--	--	--
CHPPILE	0.0380	0.0058	--	--	--	--
CHPTKLD	0.0217	0.0033	--	--	--	--
CL01 – CL21	0.0220	0.0054	--	--	--	--
DEBARKER	0.0024	0.0010	--	--	--	--
ER01 – ER17	0.0455	0.0112	--	--	--	--
FL01 – FL49	0.0477	0.0117	--	--	--	--
K01N1	K01	0.3120	0.88	0.668 <sup>(2)</sup>	8.76	1.56E-04
K01N2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K01S1		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K01S2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K02N1	K02	0.3120	0.88	0.668 <sup>(2)</sup>	8.76	1.56E-04
K02N2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K02S1		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K02S2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K03N1	K03	0.3120	0.88	0.668 <sup>(2)</sup>	8.76	1.56E-04
K03N2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K03S1		0.3120		0.668 <sup>(2)</sup>		1.56E-04
K03S2		0.3120		0.668 <sup>(2)</sup>		1.56E-04
LCE01 – LCE07	0.0052	0.0013	--	--	--	--
LCL01 - LCL24	0.0359	0.0088	--	--	--	--
LR01 – LR46	0.1116	0.0274	--	--	--	--
PLANER	0.2706	0.1591	--	--	--	--
PM01 – PM43	0.0144	0.0035	--	--	--	--

**ATTACHMENT - Emission Rates for Ambient Air Standards**

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<b>STANDARD NO. 2 – AMBIENT AIR QUALITY STANDARDS EMISSION RATES (LBS/HR)</b>						
<b>Emission Point ID</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>Lead</b>
PSBINVNT	0.0039	0.0012	--	--	--	--
PSTKLD	0.0040	0.0006	--	--	--	--
SAWMILL	0.0083	0.0033	--	--	--	--
SILO1	0.0700	0.0220	--	--	--	--
SILO2	0.0700	0.0220	--	--	--	--
SILO3	0.0700	0.0220	--	--	--	--

<b>STANDARD NO. 7 - PSD CLASS II INCREMENT EMISSION RATES (LBS/HR)</b>					
<b>Emission Point ID</b>		<b>Minor Source Baseline Dates</b>			
		<b>12/1/1981</b>	<b>3/3/2017</b>	<b>12/1/1981</b>	<b>4/5/2001</b>
		<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>
K01N1	K01	0.3120	0.2970	0.22	0.668
K01N2		0.3120	0.2970	0.22	0.668
K01S1		0.3120	0.2970	0.22	0.668
K01S2		0.3120	0.2970	0.22	0.668
K02N1	K02	0.3120	0.2970	0.22	0.668
K02N2		0.3120	0.2970	0.22	0.668
K02S1		0.3120	0.2970	0.22	0.668
K02S2		0.3120	0.2970	0.22	0.668
K03N1	K03	0.3120	0.2970	0.22	0.668
K03N2		0.3120	0.2970	0.22	0.668
K03S1		0.3120	0.2970	0.22	0.668
K03S2		0.3120	0.2970	0.22	0.668

<b>STANDARD NO. 8 – DE MINIMIS TOXIC AIR POLLUTANTS EMISSION RATES (LBS/HR)</b>				
<b>Emission Point ID</b>	<b>Methyl Ethyl Ketone</b>	<b>--</b>	<b>--</b>	<b>--</b>
	<b>78-93-3</b>	<b>--</b>	<b>--</b>	<b>--</b>
K01	8.4E-07			
K02	8.4E-07	--	--	--
K03	8.4E-07	--	--	--

## **Appendix B – Memorandum of Agreement 2017-609**

## MEMORANDUM OF AGREEMENT

## BETWEEN

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

## AND

CATAWBA INDIAN NATION

## I. PURPOSE:

The South Carolina Department of Health and Environmental Control (hereafter referred to as DHEC) and Catawba Indian Nation (hereafter referred to as Catawba Nation) hereby enter into this Memorandum of Agreement (hereafter MOA) for the purpose of cooperation and assistance in the implementation of an ambient air monitoring program incorporating one Ozone Ambient Monitoring Site (AMS) meeting the United States Environmental Protection Agency (EPA) guidance for Ambient Air Quality Surveillance.

## II. SCOPE OF SERVICES:

A. Responsibilities of DHEC. Under the terms of this MOA, DHEC shall:

1. Loan monitoring equipment ("the Equipment") comparable to that used in the South Carolina Ambient Air Monitoring Network to the Catawba Nation. The Equipment may include:
  - a. One monitoring shelter sufficient to house monitoring systems, and
  - b. Instrumentation for monitoring shelter temperature.
2. Coordinate with the Catawba Environmental Department Manager to provide, if requested, technical support for the institution of a Quality System and the development of data management processes, and
3. Remove the shelter and the Equipment when it is no longer desired or at the termination of this Agreement, whichever comes first.

B. Responsibilities of Catawba Nation. Under the terms of this MOA, the Catawba Nation shall:

1. Maintain an EPA approvable Quality Management Plan and Quality Assurance Project Plan for ambient air monitoring;
2. Ensure the proper routine daily operation, maintenance and security of the monitoring Equipment;
3. Recover, verify and report the ambient data collected from the monitoring equipment;
4. Pay electricity, water and other costs necessary for the proper operation and maintenance of the AMS; and
5. Provide DHEC staff with access to the site and the Equipment for the purpose of inspecting and servicing the Equipment as needed.

## III. TERMS AND CONDITIONS:

A. Effective Dates.

This MOA shall be effective on April 15, 2017 or when all parties have signed, whichever date is later, and will terminate December 31, 2018.

B. Termination.

1. Subject to the provisions contained below, this MOA may be terminated by either party with thirty (30) days advance written notice of termination.
2. In the event sufficient funding is not available for performance of this MOA, the MOA shall terminate without further obligations of the parties subject to subparagraph number four (4) below.
3. DHEC may terminate this MOA for cause, default or negligence on the part of the Catawba Nation at any time without any advance written notice.

4. In the event of termination for any reason, the Catawba Nation agrees to allow DHEC staff access to the site for the purpose of retrieving the DHEC-owned Equipment.
- C. Amendment.  
Any changes to this MOA, which are mutually agreed upon between DHEC and the Catawba Nation, shall be incorporated in written amendment to this MOA and will not become effective until the amendment is signed by each party.
- D. Record keeping, Audits, and Inspections.  
Records with respect to all matters covered by this MOA must be retained for 6-years after the end of the period of this MOA and shall be available for audit and inspection at any time such audit is deemed necessary by DHEC. If audit has begun but is not completed at the end of the 6-year period, the records shall be retained until resolution of the audit findings.
- E. Liability.  
Neither party shall be liable for any claims, demands, expenses, liabilities and losses (including reasonable attorney's fees) which may arise out of any acts or failures to act by the other party, its employee or agents, in connection with the performance of services pursuant to this MOA. Neither party is an employee, agent, partner, or joint venturer of the other. Neither party has the right or authority to control or direct the activities of the other or the right or ability to bind the other to any agreement with a third party or to incur any obligation or liability on behalf of the other party, unless expressly authorized in this MOA.
- F. Non-Discrimination.  
No person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination in relation to any activities carried out under this MOA on the grounds of race, age, health status, disability, color, sex, religion, or national origin. This includes the provision of language assistance services to individuals of limited English proficiency eligible for services provided by DHEC.
- G. Drug Free Workplace.  
By signing this MOA, Catawba Nation certifies that they will comply with all applicable provisions of The Drug-free Workplace Act, S. C. Code of Laws Section 44-107-10 et. seq., as amended.
- H. Choice of Law.  
The MOA, any dispute, claim, or controversy relating to the MOA and all the rights and obligations of the parties shall, in all respects, be interpreted, construed, enforced and governed by and under the laws of the State of South Carolina, except its choice of law rules.
- I. Disputes.  
All disputes, claims, or controversies relating to the MOA shall be resolved in accordance with the South Carolina Procurement Code, S.C. Code Section 11-35-10 et seq., to the extent applicable, or if inapplicable, claims shall be brought in the South Carolina Court of Common Pleas for Richland County or in the United States District Court for the District of South Carolina, Columbia Division. By signing this MOA, Contracting Party consents to jurisdiction in South Carolina and to venue pursuant to this MOA. Contracting Party agrees that any act by DHEC regarding the MOA is not a waiver of either sovereign immunity or immunity under the Eleventh Amendment of the United States Constitution, and is not a consent to jurisdiction of any court of agency of any other state.
- J. Preventing and Reporting Fraud, Waste and Abuse.  
SCDHEC has procedures and policies concerning the prevention and reporting of fraud, waste and abuse (FWA) in agency-funded programs, including but not limited to those funded by federal grants such as Medicaid. No agency employee, agent, or contractor shall direct, participate in, approve, or tolerate any violation of federal or state laws regarding FWA in government programs.

Federal law prohibits any person or company from knowingly submitting false or fraudulent claims or statements to a federally funded program, including false claims for payment or conspiracy to get such a claim approved or paid. The False Claims Act includes "whistleblower" remedies for employees who are retaliated

against in their employment for reporting violations of the Act. Under State law, persons may be criminally prosecuted for false claims made for health care benefits, for Medicaid fraud, for insurance fraud, or for using a computer in a fraud scheme or to obtain money or services by false representations. Additional information regarding the federal and state laws prohibiting false claims and SCDHEC's policies and procedures regarding false claims may be obtained from the agency's Contracts Manager or Bureau of Business Management.

Any employee, agent, or contractor of SCDHEC who submits a false claim in violation of federal or state laws will be reported to appropriate authorities.

If the Catawba Nation, Catawba Nation's agents or employees have reason to suspect FWA in agency programs, this information should be reported in confidence to the agency. A report may be made by writing to the Office of Internal Audits, SCDHEC, 2600 Bull Street, Columbia, South Carolina 29201; or by calling the Agency Fraud, Waste and Abuse Hotline at 803-896-0650 or toll-free at 1-866-206-5202. The Catawba Nation is required to inform Catawba Nation's employees of the existence of DHEC's policy prohibiting FWA and the procedures for reporting FWA to the agency.

- K. Insurance.  
Each of the parties agree to maintain professional, malpractice and general liability insurance, and may be required to provide the other party with satisfactory evidence of such coverage. Neither party will provide individual coverage for the other party's employees and each party shall be responsible for coverage of its respective employees.
- L. Liability.  
Each party shall bear and be responsible solely for its own costs and expenses necessary to comply with this MOA.
- M. Notice.  
All notices shall be sent to:

FOR DHEC:  
Micheal Mattocks  
Division of Air Quality Analysis  
8231 Parklane Road  
Columbia, South Carolina 29223

FOR Catawba Indian Nation:  
Darin Steen  
Environmental Director  
996 Avenue of the Nation  
Rock Hill, South Carolina, SC

AS TO DHEC

AS TO CATAWBA INDIAN NATION

BY: Myra Reese  
Myra Reese  
Director of Environmental Affairs  
DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL

BY: William Harris  
William Harris  
Chief  
CATAWBA INDIAN NATION

DATE: 5-5-14

DATE: 4-25-17

BY: [Signature]

Micheal Mattocks  
Interim Director  
Division of Air Quality Analysis

DATE: 5/5/17

THIS AGREEMENT IS NOT OFFICIAL AND BINDING UNTIL SIGNED BY THE SCDHEC CONTRACTS MANAGER.

Francine Miller  
Francine Miller  
SCDHEC Contracts Manager

DATE: 5-12-17