

AIR EMISSION PERMIT NO. 03100002- 001

IS ISSUED TO

Hedstrom Lumber Co. Inc.

HEDSTROM LUMBER CO. INC. - GRAND MARAIS

1504 Gunflint Traill

Grand Marais, Cook County, MN 55604

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type
Total Facility Operating Permit

Application Date
04/17/1995

This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/Limits to Avoid NSR

Issue Date: October 3, 2005

Expiration: October 3, 2010
All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

Notwithstanding the foregoing permit shield protection, the MPCA and U.S. Environmental Protection Agency (EPA) specifically reserve, and the Permittee accepts the permit knowing that the MPCA or EPA may investigate, initiate and pursue enforcement action for continuing violations or violations that occurred prior to or at the time of permit issuance and that may be addressed by conditions in this permit. Enforcement action may include, but is not limited to, further corrective action and penalties. In addition, prior to any future modification related activities that may increase the emissions of Particulate Matter less than 10 um in size (PM₁₀), a thorough National Ambient Air Quality Standards modeling analysis for PM₁₀ must be completed and approved by the MPCA.

FACILITY DESCRIPTION:

Hedstrom Lumber Company, Inc. processes raw logs to produce dimensional lumber and, as a result, byproducts consisting of hogged bark, sawdust and wood shavings. The lumber is kiln dried and finished with a planer before shipping to customers in the upper Midwest. Byproducts are conveyed to storage bins or piles and are either sold or used to feed the wood-fired boilers that create steam for the kilns. The primary pollutants emitted from the facility are Particulate Matter (PM) and Volatile Organic Compounds (VOC). PM emissions are primarily a result of the facility's lumber processing and the VOC emissions are primarily a result of the kilns.

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility	
What to do	Why to do it
SOURCE-SPECIFIC REQUIREMENTS	hdr
Ambient Air Quality Standards: The Permittee shall comply and demonstrate compliance with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50 and with Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. The permittee may demonstrate compliance through modeling, monitoring or an alternative widely-accepted method approved in writing from the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subd. 4a and 9; Minn. R. 7007.0080, subp. 5; Minn. R. 7007.0100, subps. 7A, 7L and 7M; Minn. R. 7007.0800, subps. 1, 2 and 4; Minn. R. 7009.0010 - 7009.0080
Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150; Minn. R. 7009.0020
OPERATIONAL REQUIREMENTS	hdr
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p> <p>The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	<p>Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2</p>
<p>Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.</p>	<p>Minn. R. 7017.2025</p>
MONITORING REQUIREMENTS	hdr
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
RECORDKEEPING	hdr
<p>Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>
<p>Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.</p>	<p>Minn. R. 7007. 0800, subp. 5(B)</p>
REPORTING/SUBMITTALS	hdr
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>
<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	<p>Minn. R. 7019.1000, subp. 2</p>
<p>Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.</p>	<p>Minn. R. 7019.1000, subp. 1</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Fugitive Emissions Control Plan: The Permittee shall submit a fugitive emissions control plan within 60 days of the date of permit issuance for review and approval by the Commissioner. The plan shall identify all fugitive emission sources, primary and contingent control measures, and record keeping. The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive emission control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Application for Permit Reissuance: due 180 days before expiration of existing permit.	Minn. R. 7007.0400, subp. 2
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 001 Sawmill Operations

Associated Items: EU 008 Sawmill: Debarker 2 (North)

EU 020 Sawmill: Headsaw

EU 021 Sawmill: Twin Band Scragg

EU 022 Sawmill: Twin Band Resaw

EU 023 Sawmill: Circular Gang Saw

EU 024 Sawmill: Board Edger

EU 025 Sawmill: Trim Saw

EU 026 Sawmill: Chipper (Chipper Bldg.)

EU 027 Sawmill: Hog

EU 037 Sawmill: Debarker 1 (South)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
<p>(Effective upon written approval from the MPCA stating that the facility demonstrated and is compliant with the NAAQS)</p> <p>The Permittee may replace or move listed emission units in GP 001, provided emissions are tracked and calculated directly from material usage and surface area cut (using the established emission factor of 5.02E-05 lbs (PM and PM10)/Surface feet of Area Cut or the most recently approved MPCA emission factor). All changes must meet the requirements for GP001.</p> <p>If a proposed change triggers an applicable requirement that is not contained in this permit, the change must go through the appropriate procedure in Minn. R. ch. 7007.</p>	<p>Title I Condition: Limit to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2</p>
<p>(continued)</p> <p>For example, Saw A cutting a maximum surface area of 500 square feet/hr is to be replaced by Saw B which is capable of cutting a maximum surface area of 400 square feet/hr.</p> <p>Saw A: $[5.02E-05 \text{ lbs (PM and PM10)/Surface Area Cut}] \times 500 \text{ square feet/hr} = 0.025 \text{ lbs/hr}$</p> <p>Saw B: $[5.02E-05 \text{ lbs (PM and PM10)/Surface Area Cut}] \times 400 \text{ square feet/hr} = 0.020 \text{ lbs/hr}$</p> <p>Change in emissions = Saw B-Saw A = -0.005 lbs/hr. As a result of a decrease in emissions, no permitting procedure is required as described in Minn. R. ch. 7007.</p>	<p>(continued)</p> <p>Title I Condition: Limit to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2</p>
<p>Production: less than or equal to 180 Other using 12-month Rolling Sum (Other is defined as million board feet per year) to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.</p>	<p>Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2</p>
<p>Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is replaced, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced equipment prior to making the pre-authorized change.</p> <p>The list shall correlate the units to the numbers used in this permit (EU, GP, CE) and shall include the data on GI-04, GI-05B, and GI-05C. The date of construction shall be the date the change was made for the replaced equipment.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>The following requirements of GP001 apply separately to each item listed under GP001.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.</p>	<p>Minn. R. 7011.0715, subp. 1(A)</p>
<p>Opacity: less than or equal to 20 percent opacity.</p>	<p>Minn. R. 7011.0715, subp. 1(B)</p>
MONITORING AND RECORDKEEPING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

<p>Daily Recordkeeping - Production Data. At the close of each business day, the Permittee shall calculate and record the following per species cut and cumulative total:</p> <ol style="list-style-type: none"> 1). Operating Rate (board feet/hour) 2). Board Feet 3). Board Tallies 4). Lug Fill 5). Species 6). Run Time 7). Total Square feet of sawn surface 	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Recordkeeping - Production Data. By the 15th of the month, the Permittee shall calculate and record the following per species cut and cumulative total using daily records:</p> <ol style="list-style-type: none"> 1). Operating Rate (board feet/hour) 2). Board Feet 3). Board Tallies 4). Lug Fill 5). Species 6). Run Time 7). Total Square feet of sawn surface 8). The 12-month rolling sum of board feet for the previous 12 month period by summing the monthly data for the previous 12 months. 	Minn. R. 7007.0800, subp. 4 and 5
<p>Performance Test: due 180 days before expiration of Existing Permit to measure PM and PM10 emissions and re-establish the associated emission factor. That emission factor is currently established at 5.02E-05 lbs (PM and PM10)/Surface feet of Area Cut.</p>	Minn. R. 7017.2020, subp. 1
<p>Performance Test Notifications and Submittals;</p> <p>Performance Test Notification (written): due 30 days before each Performance Test</p> <p>Performance Test Plan: due 30 days before each Performance Test</p> <p>Performance Test Pre-Test Meeting: due 7 day before each Performance Test</p> <p>Performance Test Report: due 45 days after each Performance Test</p> <p>Performance Test Report - Microfiche Copy or CD: due 105 day after each Performance Test.</p> <p>The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 002 Dry Kilns**Associated Items:** EU 003 Dry Kiln 2 (North)

EU 018 Dry Kiln 1 (South)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
The following requirements of GP002 apply separately to each item listed under GP002.	Minn. R. 7007.0800, subp. 2
Process Throughput: less than or equal to 25 Other using 12-month Rolling Sum (Other is defined as million board feet per year) to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 003 Planer (Mill A)**Associated Items:** EU 006 Planer (Mill A): 6 Head Planer

EU 028 Planer (Mill A): Trim Saw

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 87.6 Other using 12-month Rolling Sum (Other is defined as million board feet per year) to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
The following requirements of GP003 apply separately to each item listed under GP003.	Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5
CONTROL EQUIPMENT - see also GP005	hdr
The cyclones (CE 003 and CE 006) shall be operated at all times when the emission unit is in operation. See GP 005 for cyclone requirements.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 004 Planer (Mill B)**Associated Items:** EU 004 Feed Through Moulder (Mill B)

EU 030 Planer (Mill B): Resaw

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 61.32 Other using 12-month Rolling Sum (Other is defined as million board feet per year) to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
The following requirements of GP004 apply separately to each item listed under GP004.	Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5
CONTROL EQUIPMENT - see also GP005	hdr
The cyclones (either CE 004 or CE 005) shall be operated at all times when the emission unit is in operation. See GP 005 for cyclone requirements.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 005 Control Equipment - Cyclones**Associated Items:** CE 001 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones

CE 002 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones

CE 003 Centrifugal Collector - High Efficiency

CE 004 Centrifugal Collector - High Efficiency

CE 005 Centrifugal Collector - High Efficiency

CE 006 Centrifugal Collector - High Efficiency

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
The requirements of GP005 apply separately to each item listed under GP005.	Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 80 percent control efficiency	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 80 percent control efficiency	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the cyclone at all times that any emission unit controlled by the cyclone is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the cyclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Visible Emissions: The Permittee shall check the cyclone stack for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0800, subp. 4 and 5
MONITORING AND RECORDKEEPING	hdr
Recordkeeping of Visible Emissions: The Permittee shall record the time and date of each visible emission inspection and whether or not any visible emissions were observed.	Minn. R. 7007.0800, subp. 4 and 5
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the cyclone or any of its components are found during the inspections to need repair. Corrective actions shall return the operation to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the cyclone. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5 & 14
Daily Inspections: Once each operating day, the Permittee shall visually inspect the condition of the control equipment and associated connections with respect to any condition that may affect the control equipments performance. The Permittee shall maintain a daily written record of inspections.	Minn. R. 7007.0800, subp. 4 and 5
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If any of the control equipment components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall include completion of necessary repairs identified during the inspection, as applicable. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: GP 006 Boilers**Associated Items:** EU 001 Boiler 1

EU 002 Boiler 2

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
The Permittee shall comply with the requirements of 40 CFR pt. 60, subp. Dc.	40 CFR pt. 60, subp. Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; Minn. R. 7011.0570
Capacity: less than or equal to 24.75 million Btu's/hour for each boiler.	Minn. R. 7007.0800, subp. 2
Fuel Type: Wood waste.	Minn. R. 7005.0100, subp. 35a
Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain the total fuel use and the type of fuel. This shall be based on throughput logs, meters, and/or delivery records.	Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping of Fuel Type: The Permittee shall keep records of the type of fuel burned by the 15th day of each month, when in operation.	Minn. R. 7007.0800, subps. 4 and 5
CONTROL EQUIPMENT - see also GP005	hdr
The cyclones (CE 001 and CE 002) shall be operated at all times when the emission unit is in operation. See GP 005 for cyclone requirements.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 007 Planer (Mill A): Hog**Associated Items:** CE 003 Centrifugal Collector - High Efficiency

CE 006 Centrifugal Collector - High Efficiency

SV 006 Shaving Bins Cyclone S.V.

SV 007 Fuel Silos Cyclone S.V.

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 17,520 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5
CONTROL EQUIPMENT - see also GP005	hdr
The cyclones (CE 003 and CE 006) shall be operated at all times when the emission unit is in operation. See GP 005 for cyclone requirements.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 010 Emergency Boiler

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Capacity: less than or equal to 8.5 million Btu's/hour .	Minn. R. 7007.0800, subp. 2
Operational restriction of 200 hours per year using a 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Minn. R. 7007.0800, subp. 4 & 5
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input using 3-hour Average	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Wood waste.	Minn. R. 7005.0100, subp. 35a
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Hours of Operation. By the 15th of the month, the Permittee shall calculate and record the following: 1). The total hours of operation in the previous calendar month using daily records. 2). The 12-month rolling sum of total Hours of Operation for the previous 12 month period by summing the monthly emissions data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5
Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain the total fuel use and the type of fuel. This shall be based on throughput logs, meters, and/or delivery records.	Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping of Fuel Type: The Permittee shall keep records of the type of fuel burned by the 15th day of each month, when in operation.	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 012 Chip Bin: at Sawmill 1 (West)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 21,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 013 Bark/Hog Fuel Bin at Sawmill 1 (West)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 18,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 014 Planer Shavings Bin Loadout 1 (South)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 7,800 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 015 Bark/Hog Fuel Silo A (East)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 9,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 035 Bark/Hog Fuel Silo B

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 9,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 036 Bark/Hog Fuel Silo C

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 9,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 038 Chip Bin: at Sawmill 2 (East)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 24,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 039 Bark/Hog Fuel Bin at Sawmill 2 (East)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 9,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 040 Planer Shavings Bin Loadout 3 (North)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 6,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

Subject Item: EU 041 Planer Shavings Bin Loadout 2 (Middle)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Process Throughput: less than or equal to 6,000 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.	Title I Condition: Limit to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity.	Minn. R. 7011.0715, subp. 1(B)
MONITORING AND RECORDKEEPING	hdr
Monthly Recordkeeping - Throughput. By the 15th of the month, the Permittee shall calculate and record the following per species and cumulative total using daily production records: 1). Throughput in board feet. 2). The 12-month rolling sum of throughput for the previous 12 month period by summing the monthly data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5

TABLE B: SUBMITTALS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais
Permit Number: 03100002 - 001

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

What to send	When to send	Portion of Facility Affected
Computer Dispersion Modeling Protocol	<p>due 270 days after Permit Issuance for modeling PM10. This protocol will describe the proposed modeling methodology and input data, in accordance with MPCA modeling guidance for Title V air dispersion modeling analyses. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.</p> <p>This requirement is not necessary if the permittee chooses to demonstrate compliance through monitoring or an alternative widely-accepted method approved in writing from the MPCA.</p>	Total Facility
Computer Dispersion Modeling Results	<p>due 1,096 days after Permit Issuance for PM10. To be submitted after the MPCA has reviewed and approved the modeling protocol. The submittal should adhere to MPCA modeling guidance for Title V air dispersion modeling analyses. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.</p> <p>This requirement is not necessary if the permittee chooses to demonstrate compliance through monitoring or an alternative widely-accepted method approved in writing from the MPCA.</p>	Total Facility
Monitoring Plan	<p>due 1,096 days after Permit Issuance for Ambient Air Monitoring.</p> <p>Monitoring shall be done to measure ambient concentrations of PM10 along the fenceline and in the vicinity of the facility. As approved by the MPCA, the Permittee shall install monitoring equipment using an approved option. This is a state-only requirement and it is not enforceable by the EPA Administrator or citizens under the Clean Air Act.</p> <p>This requirement is not necessary if the permittee chooses to demonstrate compliance through modeling or an alternative widely-accepted method approved in writing from the MPCA.</p>	Total Facility

TABLE B: RECURRENT SUBMITTALS

10/03/05

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Annual Report	due 30 days after end of each calendar year following Permit Issuance. The Permittee shall submit an annual report by January 30th that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall include the emission unit, stack/vent, group, and control equipment data for any replaced units in GP 001. The report shall document the PM and PM10 12-month rolling sum calculations for the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained compliance status for New Source Review.	GP001
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL

Facility Name: Hedstrom Lumber Co Inc - Grand Marais

Permit Number: 03100002-001

APPENDIX A: Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane.	Minn. R. 7011.0510 Minn. R. 7011.0515
3(C)	Fabrication operations: equipment used exclusively for forging, pressing, drawing, spinning, or extruding hot metals.	Minn. R. 7011.0710 Minn. R. 7011.0715
3(H)	Miscellaneous:	
	1. total usage of less than 200 gallons of VOC (including hazardous air pollutant-containing VOC) combined in any consecutive 12 months period at a stationary source;	Minn. R. 7011.0710 Minn. R. 7011.0715 Minn. R. 7011.0105
	4. brazing, soldering or welding equipment;	Minn. R. 7011.0510 Minn. R. 7011.0515 Minn. R. 7011.0610 Minn. R. 7011.0710 Minn. R. 7011.0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of carbon monoxide; and 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone.	Minn. R. 7011.1505
3(J)	Fugitive Emissions from roads and parking lots.	Minn. R. 7011.0150
3(K)	Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source, such as spray painting of buildings, machinery, vehicles, and other supporting equipment.	Minn. R. 7011.0710 Minn. R. 7011.0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 03100002-001

This Technical Support Document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2421)
Hedstrom Lumber Company, Inc. 1504 Gunflint Trail Grand Marais, MN 55604	Hedstrom Lumber Company, Inc. 1504 Gunflint Trail Grand Marais, MN 55604 Cook County
Contact: Howard Hedstrom Phone: 218-387-2995	

1.2. Description of the Permit Action

Hedstrom Lumber Company, Inc. processes raw logs to produce dimensional lumber and, as a result, byproducts consisting of hogged bark, sawdust and wood shavings. The lumber is kiln dried and finished with a planer before shipping to customers in the upper Midwest. Byproducts are conveyed to storage bins or piles and are either sold or used to feed the wood-fired boilers that create steam for the kilns. The primary pollutants emitted from the facility are Particulate Matter (PM) and Volatile Organic Compounds (VOC). PM emissions are primarily a result of the facility's lumber processing and the VOC emissions are primarily a result of the kilns.

The permit application for issuance of this Part 70 Total Facility Permit was submitted, and received by the Minnesota Pollution Control Agency (MPCA) in accordance with the 1995 deadline. The permittee has continued to update the application throughout the completion of this permit.

1.3 Description of any Changes Allowed with this Permit Issuance

Effective upon written approval from the MPCA stating that the facility demonstrated and is compliant with the National Ambient Air Quality Standards (NAAQS), this permit pre-authorizes specific replacement activities that may occur over the life of the permit. The permittee may replace existing production emissions units with like-kind units of similar purpose, technology, and capacity. Refer to Section 3.1 for additional information regarding this topic.

1.4 Permit History

Permit Number and Issuance Date	Action Authorized
2352-90-OT-1 07/24/1990	Air Emission Permit: Sawmill and Wood Processing Facility and Air Pollution Control Equipment

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

	PM Tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	169.49	155.18	5.44	47.89	130.6	83.27	5.76	5.76
Total Facility Actual Emissions (2004)	52.71	27.12	0.17	8.4	31.28	17.31	HAPs not reported in emission inventory	

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		PM, PM ₁₀	SO ₂ , CO, NO _x , VOC, HAP, Lead
Part 70 Permit Program	PM, PM ₁₀ , CO		SO ₂ , NO _x , VOC, HAP, Lead

2. **Regulatory and/or Statutory Basis**

New Source Review

The Facility has chosen limits to avoid major source classification for New Source Review (40 CFR § 52.21).

Part 70 Permit Program

The Facility is a major source under the federal operating permits program (40 CFR pt. 70).

New Source Performance Standards (NSPS)

Portions of the facility are subject to 40 CFR pt. 60, subp. Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility has HAP emissions such that it is a non-major source under 40 CFR pt. 63. Therefore, no NESHAPs apply.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0150 Standards of Performance for control of fugitive Particulate Matter
- Minn. R. 7011.0570 Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment

Table 3. Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
Total Facility (TF)	Minn. Stat. Section 116.07, subds. 4a and 9; Minn. R. 7009.0020; Minn. R. 7011.0150; Minn. R. 7007.0100; Minn. R. 7007.0800, subp. 2	Modeling requirements to verify compliance status with the NAAQS.
GP 001	a) Title I Condition to avoid classification as a major source and modification 40 CFR § 52.21 Minn. R. 7007.0800 b) Minn. R. 7007.0800 c) Minn. R. 7011.0715 d) Minn. R. 7017.2020 Minn. R. 7017.2030 Minn. R. 7017.2018 Minn. R. 7017.2035	a) Limit set to allow the replacement and/or movement of listed emissions units using the establish emission factor to avoid modification and major source classification under 40 CFR § 52.21 (Effective upon written approval from the MPCA stating that the facility demonstrated and is compliant with the NAAQS). Production limit to avoid major source classification under 40 CFR § 52.21. b) Monitoring, reporting and recordkeeping requirements ensure compliance. c) Standards of performance limits for particulate matter for industrial equipment. d) Testing requirements to ensure and verify compliance.

GP 002	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
GP 003	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p> <p>d) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p> <p>d) Pollution control requirements to avoid major source classification under 40 CFR § 52.21.</p>
GP 004	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p> <p>d) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p> <p>d) Pollution control requirements to avoid major source classification under 40 CFR § 52.21.</p>

GP 005	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p>	<p>a) Control efficiency limits and operational requirements taken to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure proper operation and compliance.</p>
GP 006	<p>a) 40 CFR pt. 60, subp. Dc Minn. R. 7011.0570</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7005.0100</p> <p>d) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800 Minn. R. 7007.0800</p>	<p>a) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Fuel restriction ensures compliance.</p> <p>d) Pollution control requirements to avoid major source classification under 40 CFR § 52.21.</p>
EU 007	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p> <p>d) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p> <p>d) Pollution control requirements to avoid major source classification under 40 CFR § 52.21.</p>

EU 010	<p>a) Minn. R. 7011.0515</p> <p>b) Minn. R. 7011.0715</p> <p>c) Minn. R. 7007.0800</p> <p>d) Minn. R. 7005.0100</p>	<p>a) Standards of performance limits for particulate matter and opacity for new indirect heating equipment</p> <p>b) Standards of performance limits for particulate matter for industrial equipment.</p> <p>c) Monitoring and recordkeeping requirements ensure compliance.</p> <p>d) Fuel restriction ensures compliance.</p>
EU 012	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
EU 013	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
EU 014	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>

EU 015	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
EU 035	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
EU 036	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>
EU 038	<p>a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800</p> <p>b) Minn. R. 7007.0800</p> <p>c) Minn. R. 7011.0715</p>	<p>a) Production limit to avoid major source classification under 40 CFR § 52.21.</p> <p>b) Monitoring and recordkeeping requirements ensure compliance.</p> <p>c) Standards of performance limits for particulate matter for industrial equipment.</p>

EU 039	a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800 b) Minn. R. 7007.0800 c) Minn. R. 7011.0715	a) Production limit to avoid major source classification under 40 CFR § 52.21. b) Monitoring and recordkeeping requirements ensure compliance. c) Standards of performance limits for particulate matter for industrial equipment.
EU 040	a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800 b) Minn. R. 7007.0800 c) Minn. R. 7011.0715	a) Production limit to avoid major source classification under 40 CFR § 52.21. b) Monitoring and recordkeeping requirements ensure compliance. c) Standards of performance limits for particulate matter for industrial equipment.
EU 041	a) Title I Condition to avoid classification as a major source under 40 CFR § 52.21 Minn. R. 7007.0800 b) Minn. R. 7007.0800 c) Minn. R. 7011.0715	a) Production limit to avoid major source classification under 40 CFR § 52.21. b) Monitoring and recordkeeping requirements ensure compliance. c) Standards of performance limits for particulate matter for industrial equipment.

The language 'This is a state-only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act' refers to permit requirements that are mandated by state law rather than by the federal Clean Air Act. The language is to clarify the distinction between permit conditions that are required by federal law and those that are required by state law. State law requirements are not enforceable by U.S. Environmental Protection Agency (EPA) or by citizens under the federal Clean Air Act, but are fully enforceable by the MPCA and citizens under provisions of state law.

3. Technical Information

3.1 Pre-authorized Changes

Effective upon written approval from the MPCA stating that the facility demonstrated and is compliant with the NAAQS, the Permittee is pre-authorized to replace existing emissions units with similar or like-kind units if the replacements do not trigger new applicable requirements and the conditions of the permit continue to be met. If the conditions of the preceding statement can be achieved, the replacement of existing units with similar technology and capacity units will not cause an emissions increase under Minn. R. 7007.1200, subp. 3 (calculating emissions increases for non-Title I changes), therefore, the replacements are allowed without the need for an amendment.

3.2 Potential to Emit Calculations

Potential to emit calculations are summarized in the attached. The attachment contains a copy of the Facility Description: Potential-to-emit (by pollutant) from Delta as well as several MPCA spreadsheets. The Facility Description: Potential-to-emit (by pollutant) summarizes the PTE of the facility where as the MPCA spreadsheets contain the supporting calculations.

3.3 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
Total Facility (TF)	Fugitive Emission Control Plan (Minn. Stat. § 116.07 subd. 4a; Minn. R. 7007.0800)	On going recordkeeping to verify actions are followed in the control plan.	The Permittee will submit the fugitive emission control plan within 60 days after permit issuance to the Commissioner for review and approval.
Sawmill Operations (Group 001)	a. Replace or move listed emission units (40 CFR § 52.21 and Minn. R. 7007.0800) b. Production less than or equal to 180 million board feet /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. and b. On going recordkeeping and monitoring.	a. The permittee will track, record and report changes to ensure compliance. b. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Dry Kilns (Group 002)	Throughput less than or equal to 25,000 board feet /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	On going recordkeeping and monitoring.	Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Planer (Mill A) (Group 003, CE (Group 005))	a. Throughput less than or equal to 87.6 million board feet /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800) b. Pollution Control Equipment (40 CFR § 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800)	a. On going recordkeeping and monitoring. b. Emissions from all units must be vented to control equipment meeting the requirements of GP 005.	Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee. b. Since the group is controlled by the associated control equipment, no additional periodic monitoring is warranted.

Planer (Mill M) (Group 004, CE (Group 005))	<p>a. Throughput less than or equal to 61.32 million board feet /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)</p> <p>b. Pollution Control Equipment (40 CFR § 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800)</p>	<p>a. On going recordkeeping and monitoring.</p> <p>b. Emissions from all units must be vented to control equipment meeting the requirements of GP 005.</p>	<p>Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.</p> <p>b. Since the group is controlled by the associated control equipment, no additional periodic monitoring is warranted.</p>
Control Equipment - Cyclones (Group 005)	<p>a. PM/PM10: the cyclones must be maintained to achieve 80control efficiency or greater (limit to avoid NSR) (40 CFR § 52.21, and Minn. R. 7007.0800)</p>	Recordkeeping: O & M inspections and visible emissions.	Monitoring based on the requirements from Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance. The control equipment must be operated at any time that any process equipment is in operation.
Boilers (GP 006, CE (Group 005))	<p>a. Fuel Restriction: Wood waste (Minn. R. 7005.0100, subp. 35a)</p> <p>b. Pollution Control Equipment (40 CFR § 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800)</p>	<p>a.: Recordkeeping: Record and maintain records of the type of fuel combusted in the unit on a daily and monthly basis.</p> <p>b. Emissions from all units must be vented to control equipment meeting the requirements of GP 005.</p>	Fuel record keeping ensures compliance. Since the group is controlled by the associated control equipment, no additional periodic monitoring is warranted.

Planer (Mill A): Hog (EU 007, CE (Group 005))	<p>a. Throughput less than or equal to 17,520 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)</p> <p>b. Pollution Control Equipment (40 CFR § 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800)</p>	<p>a. On going recordkeeping and monitoring.</p> <p>b. Emissions from all units must be vented to control equipment meeting the requirements of GP 005.</p>	<p>a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.</p> <p>b. Since the group is controlled by the associated control equipment, no additional periodic monitoring is warranted.</p>
Emergency Boiler (EU 010)	<p>a. PM: ≤ 0.4 lb/MMBtu with a 3-hour basis (Minn. R. 7011.0515)</p> <p>b. Opacity: ≤ 20 % with exceptions (Minn. R. 7011.0515)</p> <p>c. Fuel Restriction: Wood waste (Minn. R. 7005.0100, subp. 35a)</p> <p>d. Hours of operation (Minn. R. 7007.0800)</p>	<p>a. & b.: None</p> <p>c.: Recordkeeping: Record and maintain records of the type of fuel combusted in the unit on a daily and monthly basis.</p> <p>c. & d. Recordkeeping: Record and maintain records of the type of fuel combusted in the unit and the hours of operation.</p>	As an emergency boiler, the Permittee will demonstrate that the emission units are and will continue to operate such that the emissions are well below the emission limits by the associated requirements.
Chip Bin: at Sawmill 1 (West) (EU 012)	<p>a. Throughput less than or equal to 21,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)</p>	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Bark/Hog Fuel Bin at at Sawmill 1 (West) (EU 013)	<p>a. Throughput less than or equal to 18,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)</p>	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.

Planer Shavings Bin Loadout 1 South (EU 014)	a. Throughput less than or equal to 7,800 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Bark/Hog Fuel Silo A (East) (EU 015)	a. Throughput less than or equal to 9,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Bark/Hog Fuel Silo B (EU 035)	a. Throughput less than or equal to 9,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Bark/Hog Fuel Silo C (EU 036)	a. Throughput less than or equal to 9,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Chip Bin: at Sawmill 2 (East) (EU 038)	a. Throughput less than or equal to 24,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Bark/Hog Fuel Bin at Sawmill 2 (East) (EU 039)	a. Throughput less than or equal to 9,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the Permittee.

Planer Shavings Bin Loadout 3 (North) (EU 040)	a. Throughput less than or equal to 6,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.
Planer Shavings Bin Loadout 2 (Middle) (EU 041)	a. Throughput less than or equal to 6,000 tons /year on a 12-month rolling sum basis (40 CFR § 52.21, and Minn. R. 7007.0800)	a. On going recordkeeping and monitoring.	a. Daily and monthly recordkeeping ensure compliance with the process throughput limit. The limit originates from the emission calculations and are as requested by the permittee.

3.4 Insignificant Activities

The Permittee has several operations, which are classified as insignificant activities. These are listed in Appendix A to the permit. These Insignificant Emission Units (IEU) are subject to the state general applicable requirements. It is our belief that IEU's listed in Appendix A to the permit associated with inconsequential environmental impacts and present little potential for violations of generally applicable requirements, therefore no monitoring will be required.

3.5 Modeling

A large group of facilities were modeled, using a screen level analysis, for compliance with NAAQS as part of the Capped Emissions Permit rulemaking. The resulting data indicated the need for a closer look at approximately 140 sources, including the Permittee. Additional screening modeling was performed by the MPCA for the permittee using site specific information such as stack heights and emission rates. The results continue to indicate that the Permittee may not be compliant with the NAAQS for PM₁₀. The permittee is required to submit a modeling protocol and conduct the modeling after permit issuance to resolve this issue. The facility will have to demonstrate compliance with the NAAQS.

3.6 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One item that deviates from guidance is the listing of certain applicable requirements at the group level even though they apply at the individual unit or control device. In general, limits that apply to individual pieces of equipment should be tracked at the unit level or stack/vent level and should not be listed as a GP. The main reason is if there is noncompliance with a limit by one unit within the group, the computer system would say the whole group was out of compliance.

One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.7 Comments Received

Public Notice Period: June 25, 2005 – July 25, 2005

During the Public Notice Period, the facility submitted a comment letter for which the MPCA responded as provided in the attached. The comments and resulting edits to the permit correct administrative errors, provide clarification and/or consistency with the emission calculations.

4. Conclusion

Based on the information provided by the Permittee, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 03100002-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules. This permit is being issued under Title V issuance goals.

Staff Members on Permit Team:

Permit writer/Engineer: Steve Gorg

Enforcement Staff: Bob Beresford

Peer Reviewer: Margaret Bartz

Modeling: Gregg Pratt

Support Staff: Laurie O'Brien

Data Entry: Beckie Olson

- Attachments:
1. Facility Description: PTE Summary (by pollutant)
 2. Supporting Calculations
 3. Response to Comments Received

Attachment 1
Facility Description: PTE Summary (by pollutant)
(Paper Copy Only)

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Attachment 2

Supporting Calculations

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Attachment 3
Response to Comments Received

August 11, 2005

Mr. Howard Hedstrom
Hedstrom Lumber Company, Inc.
1504 Gunflint Trail
Grand Marais, MN 55604

RE: Air Emission Permit No. 03100002-001

Dear Mr. Hedstrom:

This letter acknowledges the July 12, 2005 comment letter you sent regarding Air Emission Permit No. 03100002-001, for your facility. As we discussed, please find the Minnesota Pollution Control Agency's (MPCA) responses to your comments in the enclosed electronically scanned and edited copy of your comment letter. The MPCA responses are in bold text following each of your comments.

The MPCA will forward the Proposed Permit to the U.S. Environmental Protection Agency (EPA) for the 45-day comment period. The MPCA will issue the final permit to this facility upon completion of the 45-day EPA review period.

Sincerely,

Steven J. Gorg, M.S., P.E.
Environmental Engineer
Air Quality Permits Section
Industrial Division

SJG:lao

Enclosure



Hedstrom Lumber Company, Inc.

1504 Gunflint Trail
Grand Marais, MN 55604
(218) 387-2995
FAX (218) 387-2204

RECEIVED

JUL 13 2005

July 12, 2005

Steven J. Gorg, M.S., P.E.
Air Quality Permits Section
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

RE: Proposed Air Emission Permit No. 03100002-001
Comments on draft Permit

Dear Mr. Gorg:

Following are our comments on the draft permit. Most of these comments are minor, and involve clarifying the wording or units.

Under Table A: Limits and other Requirements

Pg. A-4, first box: In the line that says "Surface Area Cut", that should be preceded by "per square foot" to denote the units that we are expected to document.

MPCA Response: "Surface Area Cut" is replaced with "Surface feet of Area Cut" to be consistent with the emission calculations.

Pg. A-5, third box: Same comment as above.

MPCA Response: "Surface Area Cut" is replaced with "Surface feet of Area Cut" to be consistent with emission calculations.

Pg. A-6, The throughput is 25 million board feet per year, and that is the figure in the calculation spreadsheet. The wording should be "25 Other", and defining "Other" as million board feet. This makes the units and wording consisant with other areas in the permit.

MPCA Response: "Other" is now defined as million board feet.

Pg A-8, Last box: The shavings removal blower for EU 004 and EU 030 deliver product to either CE 004 or CE 005. There is a wye in the pipe with a two way gate, so that product goes one way at a time. To be correct, the sentence should read "The Cyclones (CE 004 or CE 005)..."

MPCA Response: The sentence now reads "The cyclones (either CE 004 or CE 005) shall be operated at all times when the emission unit is in operation."

Under Table B: One time submittals or notifications

Pg B-2, first box: There is a typo in the last line; compliance is misspelled.

MPCA Response: Compliance is now correctly spelled.

Pg B-2, second and third box: This has to do with the National Ambient Air Quality Standard. We received a letter from Carolina Espejel-Schutt dated June 15, 2005 identifying our facility as potentially exceeding the NAAQS. That letter lays out how our facility was identified, and lays out way to address resolution of the issue.

The permit should be written on the same format as this letter. The letter talks about more refined modeling, monitoring, emissions reductions through operating limits, additional control technology, or improved dispersion characteristics of our emission points, and the permit should have the same options. Also, the time limits in the draft permit are too short.

I would suggest 270 days for developing a protocol, which could include any of the items in the paragraph above. For results, I would suggest 1096 days, because if we choose to do monitoring, that process may take longer than what was proposed in the draft permit

MPCA Response: The following requirements are now in place to address the issue presented:

Computer Dispersion Modeling Protocol:

due 270 days after Permit Issuance for modeling PM10. This protocol will describe the proposed modeling methodology and input data, in accordance with MPCA modeling guidance for Title V air dispersion modeling analyses. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.

This requirement is not necessary if the permittee chooses to demonstrate compliance through monitoring or an alternative widely-accepted method approved in writing from the MPCA.

Computer Dispersion Modeling Results:

due 1,096 days after Permit Issuance for PM10. To be submitted after the MPCA has reviewed and approved the modeling protocol. The submittal should adhere to MPCA modeling guidance for Title V air dispersion modeling analyses. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.

This requirement is not necessary if the permittee chooses to demonstrate compliance through monitoring or an alternative widely-accepted method approved in writing from the MPCA.

Monitoring Plan:

due 1,096 days after Permit Issuance for Ambient Air Monitoring.

Monitoring shall be done to measure ambient concentrations of PM10 along the fenceline and in the vicinity of the facility. As approved by the MPCA, the Permittee shall install monitoring equipment using an approved option. This is a state-only requirement and it is not enforceable by the EPA Administrator or citizens under the Clean Air Act.

This requirement is not necessary if the permittee chooses to demonstrate compliance through modeling or an alternative widely-accepted method approved in writing from the MPCA.

Our interest and intent is to move to resolve the NAAQS issue as expeditiously as possible, but also want enough time, knowing how slow things can go from your end.

Thank you for the opportunity to comment.

Yours truly,

A handwritten signature in dark ink, appearing to read "Howard Hedstrom", with a long horizontal flourish extending to the right.

Howard Hedstrom
Hedstrom Lumber Co., Inc.

cc R Routhier