

**AIR EMISSION PERMIT NO. 07500019- 002**

**IS ISSUED TO**

**Louisiana-Pacific Corp**

Louisiana-Pacific Corp - Two Harbors  
Industrial Park North Highway 2  
Two Harbors, Lake County, MN 55616

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	Application Date
Total Facility Operating Permit	04/13/1995
Major Amendment	08/30/2001

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 as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Major Amendment to Federal; Part 70

**Issue Date:** March 29, 2002

**Expiration:** June 14, 2004

Title I Conditions do not expire.

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Ann M. Foss  
Major Facilities Section Manager  
Majors and Remediation Division

for Karen A. Studders  
Commissioner  
Minnesota Pollution Control Agency

JR:lh

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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 in 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.

## **FACILITY DESCRIPTION:**

The Louisiana-Pacific facility in Two Harbors, Minnesota is an oriented strand board manufacturing facility that produces structural panel used in various construction applications. This facility is situated on approximately 80 acres located in the Two Harbors Industrial Park and is identified by the Standard Industrial Classification Code 2493.

On May 18, 1984, the plant was issued its initial air emission facility permit to install and operate. In 1996 the total facility permit was revised to account for the addition of a Regenerative Thermal Oxidizer (RTO). U.S. Environmental Protection Agency issued a Consent Decree to Louisiana-Pacific Corporation that required all oriented strand board plants to install RTOs. The Title V Air Permit Application was submitted March 1995. The facility is identified by the Standard Industrial Classification Code 2493.

The air emission units that exist at this plant consist of a rotary wood wafer dryer, two thermal oil heaters, one board press, twenty-two natural gas fired paint drying ovens, painting operations, and three wood waste handling operations.

The rotary wood wafer dryer exhaust is controlled by a wet electrostatic precipitator and the regenerative thermal oxidizer. One thermal oil heater is controlled by a cyclone and a fabric filter. The second thermal oil heater, which is the back-up unit, is fueled by natural gas only and is not equipped with any control equipment. The board press emissions are uncontrolled. Emissions generated by the paint drying ovens are either controlled by the regenerative thermal oxidizer or are uncontrolled. Particulate emissions from wood waste handling are controlled by fabric filters.

## **DESCRIPTION OF THE MODIFICATION**

This permit amendment eliminates the requirement for the facility to perform full computer dispersion modeling. It is current MPCA policy to require full dispersion modeling for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, or CO if a facility has both potential and actual emissions of any of those pollutants over 100 tons.

Though Louisiana Pacific's potential emissions exceed 100 tons for NO<sub>x</sub>, PM<sub>10</sub>, and CO, actual emissions for all pollutants are less than 100 tons.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**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**

<b>What to do</b>	<b>Why to do it</b>
Comply with the O&M Plan: Follow the actions and record keeping specified in the O&M plan. The plan may be amended by the Agency's written approval.	Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Comply with Fugitive Control Plan: Follow the actions and recordkeeping specified in the fugitive control plan. The Permittee may be required to amend the fugitive control plan as requested by the Agency.	Minn. R. 7011.0150
Materials Usage Limitation: Wood type processed at the facility shall be limited to a maximum of 10% by cord softwood (e.g. pine) as a fiscal monthly average. The remainder of the wood processed shall be aspen or other hardwood. The Permittee shall maintain weekly records of the type of wood processed. The records shall include the percent by cord of the amount of softwood processed as well as the total amount of wood processed. This data shall be compiled to determine the fiscal monthly total and average.	Title I Condition:40 CFR Section 52.21 to remain a non-major source under PSD
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
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.	Minn. R. 7017.2025
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment as described in the approved O&M plan (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
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, zero and span adjustments, and chart replacement. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
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
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.  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.	Minn. R. 7019.1000, subp. 3
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.  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.	Minn. R. 7019.1000, subp. 2
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.	Minn. R. 7019.1000, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

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
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)
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
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
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)
Record keeping: 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.	Minn. R. 7007. 0800, subp. 5(B)
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).	Minn. R. 7007.0800, subp. 5(C)
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 federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
The Permittee may be required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR Part 68 which was promulgated on June 20, 1996. The rule will require each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, to design and implement an accidental release prevention program. The RMPs must be submitted to a centralized location as specified by US EPA. The Permittee may obtain the RMP submittal information at <a href="http://www.epa.gov/swercepp">http://www.epa.gov/swercepp</a> or by calling 1-800-424-9346. These requirements must be complied with no later than the latest of the following dates: (1) June 21, 1999; (2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or (3) The date on which a regulated substance is first present above a threshold quantity in a process.	40 CFR pt. 68

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** GP 001 Rotary Wood Wafer Dryer

**Associated Items:** CE 001 Electrostatic Precipitator - High Efficiency  
 CE 002 Direct Flame Afterburner w/Heat Exchanger  
 EU 001 Rotary Wood Wafer Dryer  
 SV 001  
 SV 002

What to do	Why to do it
Total Particulate Matter: less than or equal to 9.75 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Particulate Matter < 10 micron: less than or equal to 9.75 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0610, subp. 1(A)(2)
Carbon Monoxide: less than or equal to 30.5 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Volatile Organic Compounds: less than or equal to 9.04 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Fuels Allowed: the Permittee shall only burn wood waste (may include board trim), natural gas, or propane in EU 001.	Minn. R. 7007.0800, subp. 2
Pollution Control Equipment Operation, Monitoring and Record Keeping: the Permittee shall maintain operation of the wet electrostatic precipitator (CE 001) and the regenerative thermal oxidizer (CE 002) associated with GP 001. Once each day, while in operation, the Permittee shall monitor and record whether CE 001 is energized (electric current is being applied to the two T-R sets) and monitor and record the combustion chamber temperature of CE 002 either as a 3-hour rolling average or as an instantaneous reading. If CE 001 is not energized or if the combustion chamber temperature of CE 002 is less than the specified limit, take the corrective actions outlined in the O&M plan. Record all corrective actions taken upon completion of the action.	Minn. R. 7007.0800, subp. 14, Minn. R. 7007.0800, subp. 4, and Minn. R. 7007.0800, subp. 5
Temperature: greater than or equal to 1520 degrees F using 3-hour Rolling Average or as an instantaneous limit that applies all the time, at the Combustion Chamber of CE 002 (the RTO) until a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average burner temperature recorded during the most recent performance test where compliance for VOC and CO emissions was demonstrated.	Minn. R. 7017.2025, subp. 3
Performance Test: due before 07/01/2002 to measure total particulate matter, PM-10, carbon monoxide, and volatile organic compound emissions from SV001.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test	Minn. R. 7017.2030, subp. 4

# TABLE A: LIMITS AND OTHER REQUIREMENTS

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** GP 002 Spray Coating/Drying Oven Operations

**Associated Items:** CE 008 Fiberglass Filter w/o Cardboard Frame

EU 008 Coating Drying Oven, Panel  
 EU 009 Coating Drying Oven, Panel  
 EU 010 Coating Drying Oven, Lap & Trim  
 EU 011 Coating Drying Oven, Lap & Trim  
 EU 012 Coating Drying Oven, Lap & Trim  
 EU 013 Coating Drying Oven, Lap & Trim  
 EU 014 Coating Drying Oven, Lap & Trim  
 EU 015 Coating Drying Oven, Lap & Trim  
 EU 016 Coating Drying Oven, Lap & Trim  
 EU 017 Coating Drying Oven, Lap & Trim  
 EU 018 Coating Drying Oven, Lap & Trim  
 EU 019 Coating Drying Oven, Lap & Trim  
 EU 020 Coating Drying Oven, Lap & Trim  
 EU 021 Coating Drying Oven, Lap & Trim  
 EU 022 Coating Drying Oven, Lap & Trim  
 EU 023 Coating Drying Oven, Lap & Trim  
 EU 024 Coating Drying Oven, Lap & Trim  
 EU 025 Coating Drying Oven, Lap & Trim  
 EU 026 Coating Drying Oven, Lap & Trim  
 EU 027 Coating Drying Oven, Lap & Trim  
 EU 028 Coating Drying Oven, Lap & Trim  
 EU 029 Coating Drying Oven, Lap & Trim  
 EU 030 Spray Coating  
 EU 031 Spray Coating  
 EU 032 Spray Coating  
 EU 033 Spray Coating  
 EU 034 Unit Spray Booth  
 SV 001  
 SV 010  
 SV 011  
 SV 012  
 SV 013  
 SV 014  
 SV 015  
 SV 016

What to do	Why to do it
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. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: less than or equal to 20 tons/year using 365-day Rolling Sum	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Particulate Matter < 10 micron: less than or equal to 20 tons/year using 365-day Rolling Sum	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Volatile Organic Compounds: less than or equal to 100 tons/year using 365-day Rolling Sum	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

Record Keeping: the Permittee shall maintain records daily of VOCs and TSP/PM-10 emitted on a 365-day rolling sum basis. These records shall be kept every day for EU 030 through EU 034 and also for EU 008 through EU 029 if these units are not vented to the RTO (CE 002). Specific records to be kept are the gallons of paint used per day, the VOC content of the paint, the solids content of the paint, and tons per year on a 365-day rolling sum basis of VOC and TSP/PM-10 emitted.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source under PSD
Operational Flexibility: The Permittee is not required to vent emissions from the paint spraying and drying operations to CE 002.	Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 002 Thermal Oil Heater #1 (31 MMBtu/hr)**Associated Items:** CE 003 Centrifugal Collector - High Efficiency

CE 004 Fabric Filter - High Temperature, i.e., T&gt;250 Degrees F

SV 003

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuels Allowed: the Permittee shall only combust the following fuels in EU 002: wood waste (which may include material from the blending system, solids from the drying system removed by CE 001, board trim, and wood fiber from press plate cleaning), on-site generated waste (which may include waste latex paint, used oil, cardboard and paper waste, soiled rags, and combustible absorbent materials from oil, anti-freeze, water-based paint, and water or soy based ink spills). Incremental addition of on-site generated waste fuels shall be done such that combustion conditions are not upset.	Minn. R. 7007.0800, subp. 2
Record Keeping: the Permittee shall keep records of the type and quantity of fuel combusted in EU 002.	Minn. R. 7007.0800, subp. 5
Pollution Control Equipment Monitoring and Record Keeping: the Permittee shall monitor and record the pressure drop across the baghouse (CE 004) once each day while in operation. If the pressure drop is outside the proper range (identified to be 1 to 13 inches of water column), take the corrective actions outlined in the O&M plan. Record all corrective actions taken upon completion of the action.	Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5, Minn. R. 7007.0800, subp. 14
Performance Test: due before 07/01/2003 to measure total particulate matter and opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 003 Thermal Oil Heater #2 (25 MMBtu/hr)**Associated Items:** SV 004

What to do	Why to do it
Fuels Allowed: the Permittee shall only combust natural gas in EU 003.	Minn. R. 7007.0800, subp. 2
Record Keeping: the Permittee shall maintain records of the amount of natural gas combusted in EU 003 each day the unit is operated.	40 CFR Section 60.48c(g)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 004 Board Press**Associated Items:** SV 005

SV 006

What to do	Why to do it
Total Particulate Matter: less than or equal to 7.03 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Particulate Matter < 10 micron: less than or equal to 7.03 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Performance Test: due before 07/01/2001 to measure total particulate matter emissions.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 005 Wood Waste Handling Operations 1**Associated Items:** CE 005 Fabric Filter - Low Temperature, i.e., T<180 Degrees F  
SV 007

What to do	Why to do it
Total Particulate Matter: less than or equal to 4.80 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Particulate Matter < 10 micron: less than or equal to 4.80 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Pollution Control Equipment Requirements: the Permittee shall maintain operation of the fabric filter associated with the emission units listed above under Associated Items.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Observation: the Permittee shall observe the emissions from SV 007 (during daylight hours) for visible emissions of particulate matter once each day while in operation. The observers are not required to be Method 9 certified opacity readers.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Corrective Actions: If visible emissions (VEs) are observed the Permittee shall determine the cause and take corrective actions as soon as possible to eliminate the VEs.	Minn. R. 7007.0800, subp. 2
Visible Emissions Recordkeeping: the Permittee shall record the time and date of each VE inspection, and whether or not any VEs were observed. If VEs were observed, also record a brief description of the type of corrective actions taken, and the date the actions were taken.	Minn. R. 7007.0800, subp. 5
Performance Test: due before 07/01/02 to measure total particulate matter and PM-10 emissions.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 006 Wood Waste Handling Operations 2**Associated Items:** CE 006 Fabric Filter - Low Temperature, i.e., T<180 Degrees F  
SV 008

What to do	Why to do it
Total Particulate Matter: less than or equal to 3.08 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Particulate Matter < 10 micron: less than or equal to 3.08 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Pollution Control Equipment Requirements: the Permittee shall maintain operation of the fabric filter associated with the emission units listed above under Associated Items.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Observation: the Permittee shall observe the emissions from SV 008 (during daylight hours) for visible emissions of particulate matter once each day while in operation. The observers are not required to be Method 9 certified opacity readers.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Corrective Actions: If visible emissions (VEs) are observed the Permittee shall determine the cause and take corrective actions as soon as possible to eliminate the VEs.	Minn. R. 7007.0800, subp. 2
Visible Emissions Recordkeeping: the Permittee shall record the time and date of each VE inspection, and whether or not any VEs were observed. If VEs were observed, also record a brief description of the type of corrective actions taken, and the date the actions were taken.	Minn. R. 7007.0800, subp. 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

**Subject Item:** EU 007 Wood Waste Handling Operations 3**Associated Items:** CE 007 Fabric Filter - Low Temperature, i.e., T<180 Degrees F  
SV 009

What to do	Why to do it
Total Particulate Matter: less than or equal to 6.86 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Particulate Matter < 10 micron: less than or equal to 6.86 lbs/hour	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Pollution Control Equipment Requirements: the Permittee shall maintain operation of the fabric filter associated with the emission units listed above under Associated Items.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Observation: the Permittee shall observe the emissions from SV 009 (during daylight hours) for visible emissions of particulate matter once each day while in operation. The observers are not required to be Method 9 certified opacity readers.	Title I Condition: 40 CFR Section 52.21 to remain a non-major source
Visible Emissions Corrective Actions: If visible emissions (VEs) are observed the Permittee shall determine the cause and take corrective actions as soon as possible to eliminate the VEs.	Minn. R. 7007.0800, subp. 2
Visible Emissions Recordkeeping: the Permittee shall record the time and date of each VE inspection, and whether or not any VEs were observed. If VEs were observed, also record a brief description of the type of corrective actions taken, and the date the actions were taken.	Minn. R. 7007.0800, subp. 5

## TABLE B: SUBMITTALS

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors  
Permit Number: 07500019 - 002

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:

Permit Technical Advisor  
Permit Section  
Air Quality 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:

Supervisor  
Compliance Determination Unit  
Air Quality 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**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Information	due before 07/15/2002. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for PM10 and NOx). This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Fugitive Control Plan	due 60 days after 06/14/1999 for review and approval. 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 Agency's approval. If the Agency 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.	Total Facility
Operation and Maintenance Plan	due 60 days after 06/14/1999 for review and approval for all air pollution control equipment. Included in the plan should be the manufacturer's recommended operating ranges for parameters such as pressure drop across the system, liquid flow rate, liquid supply pressure, temperature ranges, etc.; corrective action procedures to be followed to return the control equipment to within specified range(s); corrective action procedures to be followed in the event of a malfunction or breakdown; a description of inspection procedures to be followed; and records kept to demonstrate plan implementation.	Total Facility
Performance Test Notification (written)	due 30 days before Performance Test	EU002, EU004, EU005, GP001
Performance Test Plan	due 30 days before Performance Test	EU002, EU004, EU005, GP001
Performance Test Report - Microfiche Copy	due 105 days after Performance Test	EU002, EU004, EU005, GP001
Performance Test Report	due 45 days after Performance Test	EU002
Performance Test Report	due 45 days after Performance Test	EU004
Performance Test Report	due 45 days after Performance Test	EU005
Performance Test Report	due 45 days after Performance Test	GP001

**TABLE B: RECURRENT SUBMITTALS**

03/29/02

Facility Name: Louisiana-Pacific Corp - Two Harbors

Permit Number: 07500019 - 002

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 06/14/1999 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report period of each calendar year covers January 1 - June 30. The second report period 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
Compliance Certification	due 30 days after end of each calendar year starting 06/14/1999 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year starting 06/14/1999 (April 1). To be submitted on a form approved by the Commissioner.	Total Facility

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT NO. 07500019-002**

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

**1. General Information**

1.1. Applicant and Stationary Source Location:

Owner/Operator Address	Facility Address (SIC Code: 2493)
<p style="text-align:center">Owner: Louisiana-Pacific Corporation 805 SW Broadway Portland, OR 97205-3303</p> <p style="text-align:center">Operator: Louisiana Pacific Corporation P.O. Box P 711 25<sup>th</sup> Avenue Two Harbors, MN 55616</p>	<p style="text-align:center">Louisiana Pacific Corporation P.O. Box P 711 25<sup>th</sup> Avenue Two Harbors, MN 55616</p>

1.2. Description Of The Facility

The Louisiana-Pacific facility in Two Harbors, Minnesota is an oriented strand board manufacturing facility that produces structural panel used in various construction applications. This facility is situated on approximately 80 acres located in the Two Harbors Industrial Park and is identified by the Standard Industrial Classification Code 2493.

On May 18, 1984, the plant was issued its initial air emission facility permit to install and operate. In 1996 the total facility permit was revised to account for the addition of a Regenerative Thermal Oxidizer (RTO). U.S. Environmental Protection Agency issued a Consent Decree to Louisiana-Pacific Corporation that required all oriented strand board plants to install RTOs. The Title V Air Permit Application was submitted March 1995. The facility is identified by the Standard Industrial Classification Code 2493.

The air emission units that exist at this plant consist of a rotary wood wafer dryer, two thermal oil heaters, one board press, twenty-two natural gas fired paint drying ovens, painting operations, and three wood waste handling operations.

The rotary wood wafer dryer exhaust is controlled by a wet electrostatic precipitator and the regenerative thermal oxidizer. One thermal oil heater is controlled by a cyclone and a fabric filter. The second

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thermal oil heater, which is the back-up unit, is fueled by natural gas only and is not equipped with any control equipment. The board press emissions are uncontrolled. Emissions generated by the paint drying ovens are either controlled by the regenerative thermal oxidizer or are uncontrolled. Particulate emissions from wood waste handling are controlled by fabric filters.

### 1.3 Description of the Activities Allowed By This Permit Action

This permit amendment eliminates the requirement for the facility to perform full computer dispersion modeling. It is current MPCA policy to require full dispersion modeling for PM10, SO2, NOx, or CO if a facility has both potential and actual emissions of any of those pollutants over 100 tons.

Though Louisiana Pacific's potential emissions exceed 100 tons for NOx, PM10, and CO, actual emissions for all pollutants are less than 100 tons.

### 1.4. Facility Emissions:

Table 2. Total Facility Potential to Emit Summary:

	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VO C tpy	Pb tpy
Total Facility Limited Potential Emissions	103	103	5.7	168	229	135	-
Total Facility Actual Emissions	18.8	23.7	0.78	46.6	89.6	5.85	-

## 2. Regulatory Overview of Units Affected by the Modification

Table 3. Regulatory Overview

EU, GRP, or SV #	Applicable Regulations	Comments
FC	Minn. R. 7007.0800, subp. 2	Modeling Information Submittal Requirements

## 3. Conclusion

Based on the information provided by Louisiana-Pacific, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 07500019-002 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Jenny L. Reinertsen

Permit Action Number:

Date: 1/30/2004