

AIR EMISSION PERMIT NO. 05700005- 001

IS ISSUED TO

POTLATCH CORPORATION

Potlatch - Bemidji
US Highway 2 East
Bemidji, Beltrami County, MN 56601

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	January 30, 2004
	(This application supersedes previous applications, including the initial Part 70 Permit Application, dated April 1995)

This permit authorizes the Permittee to operate and modify 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: Federal; Pt 70/NSR Authorization

Issue Date: June 17, 2004

Expiration: June 17, 2009

All Title I Conditions do not expire.

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

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Table C: Compliance Schedule (*Not used in this permit*)

Appendices:

Appendix A: (*Not used in this permit*)

Appendix B: List of Insignificant Activities

Appendix C: Stack Parameters

Appendix D: Fugitive Dust Control Plan

Appendix E: Applicability Analysis

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.

FACILITY DESCRIPTION:

Potlatch Corporation owns and operates an oriented strandboard (OSB) manufacturing facility in Hubbard County, Minnesota; the facility is located approximately 10 miles southeast of Bemidji, Minnesota on Hwy. 2. The existing Potlatch Bemidji facility consists of two OSB manufacturing lines. To produce OSB, logs are debarked and reduced into small strands, which are then dried, blended with a phenol-formaldehyde resin and wax mixture, formed into layers, and finally pressed into wood panels. Line 1 consists of four wood-strand triple pass rotary dryers heated with exhaust from two wood dust suspension burners, two hogged fuel boilers providing backup steam to the process, and one board press. Line 2 consists of three wood-strand triple pass rotary dryers heated with exhaust from a wood-fired thermal oil heater, and one board press. Various handling, finishing, and forming processes are also part of Line 1 and Line 2. The Bemidji facility also operates a wood-fired cogeneration boiler that provides steam to the Line 1 press, log ponds, some building heat and supplies electricity to the power grid.

The Facility is an existing major source under Federal New Source Review regulations. The Facility is also a major source of hazardous air pollutant (HAP) emissions.

The pollution control equipment and main pollutants of concern from the emission units at the facility are as follows: the Line 1 rotary dryers and associated burners are sources of particulate matter (PM and PM₁₀), volatile organic compounds (VOCs), carbon monoxide (CO), and nitrogen oxides (NO_x). The dryers and burners are currently controlled by two wet electrostatic precipitators (WESP) followed by a regenerative thermal oxidizer (RTO) which controls particulate matter, VOCs and CO. The Line 2 dryers are also sources of PM, PM₁₀, VOCs, CO and NO_x. Each dryer is controlled by a WESP (for particulate matter) and a dryer inlet temperature limitation, which serves to limit VOC emissions. The presses are uncontrolled and are primarily sources of VOC, but also particulates. The co-generation boiler is controlled by a cyclone and an ESP for control of particulates and a SNCR for control of NO_x. The back-up Keeler boilers are sources of PM, PM₁₀, VOC, CO and NO_x and are controlled by multiclones and an EFB; the boilers also have a steam-production limit. The in-plant particulate sources, e.g. the handling, finishing and forming processes, are generally controlled by baghouses. There are also fugitive particulate sources such as bark and fuel piles and paved and unpaved roads.

Potlatch is proposing to modify its mill in a modification that is being incorporated into the Title V permit. Potlatch will install two additional burners on the Line 1 dryer system and will install a thermal oxidizer on the Line 2 dryer system. Installation of the oxidizer will allow Potlatch to remove the temperature limit on the Line 2 dryers previously established as a BACT limit. These modifications will result in increased production for the facility.

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 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
Property Line Fencing: the Permittee shall maintain the fencing and gates which have previously been installed to enclose the boundaries of the property. The property shall be enclosed with a continuous fence, excluding access points, and shall have installed gates or a guard at each access point, except as described below. The Permittee shall thereafter keep the gates closed unless authorized persons are entering or leaving the property. Access points such as a railroad shall be posted with "No Trespassing" signs. The Permittee shall inspect the fencing and gates once per year to ensure compliance with access control. The Permittee shall complete all repairs and maintenance to the fencing and gates as soon as possible but no later than 30 days after the Permittee observes the need for repair or maintenance.	Minn. R. 7007.0800, subp. 2
Fugitive Dust Control Plan: The Permittee shall follow the actions and recordkeeping specified in the control plan, attached as Appendix D to this permit. Amendments to the plan may be proposed by the Permittee and are subject to review and approval by the Commissioner. 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
Parameters Used in Modeling: The stack heights, emission rates, and other parameters used in the modeling submitted 12/3/03 are listed in Appendix C of this permit. The Permittee must submit to the Commissioner for approval any revisions of these parameters and must wait for a written approval before making such changes. The information submitted must include, at a minimum, the locations, heights and diameters of the stacks, locations and dimensions of nearby buildings, the velocity and temperatures of the gases emitted, and the emission rates. The plume dispersion characteristics due to the revisions of the information must be equivalent to or better than the dispersion characteristics modeled in the 12/3/03 modeling submittal. The Permittee shall demonstrate this equivalency in the proposal. If the information does not demonstrate equivalent or better dispersion characteristics, or if a conclusion cannot readily be made about the dispersion, the Permittee must remodel.	Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000
<p>For changes that do not involve an increase in an emission rate and that do not require a permit amendment, this proposal must be submitted as soon as practicable, but no less than 60 days before beginning actual construction of the stack or associated emission unit.</p> <p>For changes involving increases in emission rates and that require a minor permit amendment, the proposal must be submitted as soon as practicable, but no less than 60 days before beginning actual construction of the stack or associated emission unit.</p> <p>For changes involving increases in emission rates and that require a permit amendment other than a minor amendment, the proposal must be submitted with the permit application.</p>	Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000
Report of loss of Clean Unit status: The Permittee shall submit written notification to the MPCA if Clean Unit status is lost due to noncompliance with 40 CFR Section 52.21(y)(9). The permittee shall submit this notification with the Semiannual Deviations Report (see Table B) and also according to the schedule in the permit for "Deviations Endangering Human Health or the Environment" (see Table A, Total Facility Requirements) if applicable. The permittee and the Agency shall attach a copy of the notification to the permit, and the permittee shall submit an application for a permit amendment within 30 days of loss of Clean Unit status.	Title I Condition; 40 CFR Section 52.21(y)(9); Minn. R. 7007.3000
<p>Loss of Clean Unit status occurs if any of the following occur:</p> <ul style="list-style-type: none"> - the permittee fails to comply with the emission limit or work practice(s) specified in the permit with the Clean Unit Designation, - the permittee makes any physical or operational change to the Clean Unit that causes the unit to operate in a manner inconsistent with any physical or operational characteristic that is part of the basis for the Clean Unit Designation - the permittee fails to comply with any term in the permit that is related to the Clean Unit Designation. 	Title I Condition; 40 CFR Section 52.21(y)(9); Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Loss of Clean Unit status: The Permittee shall submit an application for a major amendment if a modification at a Clean Unit will cause loss of Clean Unit status. The Permittee may not begin actual construction on the modification until the major amendment has been issued. Loss of Clean Unit status occurs when the major amendment is issued or if the permittee begins actual construction on a change to the Clean Unit without obtaining a permit for the change and the change causes a need to change the emission limit or work practices or changes any physical or operational characteristic that is part of the basis for determining that the control is comparable to BACT. The Permittee must use the calculation methodologies specified in 40 CFR Section 52.21(a)(2)(iv) to determine applicability of 40 CFR Section 52.21 for this modification and all subsequent modifications until the unit requalifies for Clean Unit status.	Title I Condition; 40 CFR Section 52.21(y)(2)(iii) and (iv); Minn. R. 7007.3000
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 shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment 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 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
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. 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 The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2
Operational 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 REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

<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>
<p>RECORDKEEPING</p>	<p>hdr</p>
<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>
<p>REPORTING/SUBMITTALS</p>	<p>hdr</p>
<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>
<p>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:</p> <ol style="list-style-type: none"> 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. 	<p>Minn. R. 7019.1000, subp. 1</p>
<p>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.</p>	<p>Minn. R. 7007.1150 through Minn. R. 7007.1500</p>
<p>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).</p>	<p>Minn. R. 7007.1400, subp. 1(H)</p>
<p>Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted on a form approved by the Commissioner.</p>	<p>Minn. R. 7019.3000 through Minn. R. 7019.3100</p>
<p>Emission Fees: due 60 days after receipt of an MPCA bill.</p>	<p>Minn. R. 7002.0005 through Minn. R. 7002.0095</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: GP 001 Line 1 Rotary Dryers

- Associated Items:**
- CE 001 Centrifugal Collector - High Efficiency
 - CE 002 Centrifugal Collector - High Efficiency
 - CE 003 Centrifugal Collector - High Efficiency
 - CE 004 Centrifugal Collector - High Efficiency
 - CE 043 Wet Electrostatic Precipitator
 - CE 044 Wet Electrostatic Precipitator
 - CE 045 Thermal Oxidizer
 - EU 009 Dryer 1
 - EU 010 Dryer 2
 - EU 011 Dryer 3
 - EU 012 Dryer 4
 - EU 131 Wood-fired suspension burner
 - EU 132 Wood-fired suspension burner
 - EU 134 wood-fired burner
 - EU 135 wood-fired burner
 - SV 001 Line 1 Rotary Dryers

What to do	Why to do it
POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 12 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Total Particulate Matter: less than or equal to 1.13 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 12 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.13 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 18 lbs/hour . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Volatile Organic Compounds: less than or equal to 0.60 lbs/ton of oven dried product (lb/ODT). VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 51 lbs/hour (total from dryers and CE 045).	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 1.88 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 15 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 0.49 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
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)
OPERATING REQUIREMENTS AND LIMITS	hdr
Fuel Usage: Limited to (1) dry wood fuel; (2) OSB fuel consisting of treated and clean oriented strand board trim; (3) natural gas; (4) propane; (5) alternate biomass fuels approved by the MPCA in accordance to the procedures outlined in this permit.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

<p>Biomass Fuel Usage: The Permittee may use specific biomass fuel subject to approval from the MPCA. "Biomass" means the materials define in Minn. Stat. Section 216C.051, subd. 7, including herbaceous crops, trees, agricultural waste, and aquatic plant matter, and excluding mixed municipal solid waste as defined in Minn. Stat. Section 115A.03.</p> <p>For each biomass fuel type, the Permittee may initiate a trial period consisting of no more than 90 days where that type of fuel is combusted. In order to continue operation with this type of fuel, the Permittee shall submit a proposal, subject to MPCA written approval, providing details of the new fuel (such as proximate and ultimate analysis), the method of introduction into the combustion chamber and an estimate of the change in emissions of regulated pollutants. If the emissions change is uncertain, or an increase in emissions is indicated, the Permittee shall include a schedule for performance testing in the proposal.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency (as measured from outlet of cyclones (CE 001-004) to outlet of Thermal Oxidizer (CE 045)) for Volatile Organic Compounds: greater than or equal to 90 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency (as measured from outlet of cyclones (CE 001-004) to outlet of Thermal Oxidizer (CE 045)) for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 95 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>Temperature: greater than or equal to 1586 degrees F as a three-hour rolling average at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. For the first three hours after CE 045 startup, the continuous average chamber temperature shall be used instead of the 3-hour rolling average. If the three-hour rolling average temperature, or if the chamber temperature during startup, drops below the minimum temperature limit, this shall be reported as a deviation.</p>	<p>Title I Condition: Monitoring for limits set due to 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>Number of Fields On-line: greater than or equal to 2, for each of CE 043 and CE 044, unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the number of fields on-line recorded during the most recent MPCA approved performance test where compliance for PM and/or PM10 emissions was demonstrated. If the number of fields drops below the minimum required anytime that process gases are going through the control equipment, this shall be reported as a deviation.</p>	<p>Title I Condition: Monitoring for limits set due to 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>CONTROL EQUIPMENT</p>	<p>hdr</p>
<p>The Permittee shall operate and maintain the cyclones, wet electrostatic precipitators and thermal oxidizer any time that any process equipment controlled by the wet electrostatic precipitator and thermal oxidizer is in operation. The control equipment shall be operated and maintained in accordance with the Operations and Maintenance (O&M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 14</p>
<p>The Permittee shall maintain a continuous hard copy readout or electronic file of the temperature readings and calculated three hour rolling average temperatures for the combustion chamber of the RTO.</p>	<p>Title I Condition: Monitoring for limits set due to 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Daily Monitoring and Recordkeeping: The Permittee shall physically verify operation of the temperature recording device for the thermal oxidizer at least once each operating day to verify that it is working and recording properly. The Permittee shall also verify the presence of quench water flow for the electrostatic precipitators. The Permittee shall physically verify and record the number of fields on-line at least once during each operating day of operation. The Permittee shall maintain a written record of the verifications.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Monitoring Equipment: The Permittee shall install, operate, and maintain thermocouples and a monitoring device for the thermal oxidizer to conduct temperature monitoring required by this permit and to continuously indicate and record the average combustion chamber temperature of the thermal oxidizer. The Permittee shall install, operate, and maintain equipment for determining the number of fields on line for the electrostatic precipitators and for verifying the presence of quench water flow. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components, including but not limited to the electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.</p>	<p>Minn. R. 7007.0800, subp. 4, 5, and 14</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal components, which for the thermal oxidizer shall include, but not be limited to, the refractory and heat exchanger systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the monitoring equipment at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the temperature is below the minimum specified by this permit, if the number of fields on line are below the minimum specified by this permit, or if the thermal oxidizer or electrostatic precipitators or any of their components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum, shall return the number of fields on line to at least the permitted minimum 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 appropriate control equipment. 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
CLEAN UNIT DESIGNATION	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for PM, PM10, VOCs and CO provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000
Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for determining that the unit's control technology is comparable to BACT: 1. Heat Input Capacities: Burners, with a total heat input of 140 mmBtu/hr 2. Maximum annual throughput of 262,800 ODT/yr 3. Operation of 2 WESPs and RTO	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000
Recordkeeping: - Production rate: Once each calendar day of operation, the Permittee shall calculate and record the production of ODT for the previous twenty-four hour period. The daily production shall be added to the total daily production calculated for the previous 364 calendar days to calculate a 365-day rolling sum. The 365-day rolling sum shall be recorded daily.	Title I Condition: Monitoring for Clean Unit Designation; Minn. R. 7007.0800, subp. 4 and 5
PERFORMANCE TESTING	hdr
Performance Test: due 365 days after 10/28/2003 to measure Volatile Organic Compound emissions. (Test within 1 year of previous performance test.)	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Initial Performance Test: due 180 days after Initial Startup of new burners (EU 134, EU 135) but no later than 730 days from permit issuance, to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, Carbon Monoxide, and Nitrogen Oxides emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 365 days after Initial Performance Test to determine Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, and Volatile Organic Compound emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 1,095 days after Initial Performance Test to measure Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides and Volatile Organic Compound emissions. (Test within 3 years of initial performance test.)	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
VOC Performance Tests: Whenever a performance test is conducted to measure VOC emissions, the company shall conduct a performance test for formaldehyde simultaneously with the VOC performance test for the purpose of establishing a correlation between past test procedures and recently established requirements for testing and emission factor development. Results shall be reported on (1) a carbon mass basis based on the Method 25 or 25A data alone; and (2) an "as VOC" basis, summing the Method 25 or 25A data (adjusted to a propane mass basis) and the formaldehyde test result, and correcting the results as described in AP-42 Section 10.6.1.3, dated 3/2002. The carbon mass result will be used for demonstrating compliance with the carbon mass based limit.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: GP 002 Line 2 Rotary Dryers

- Associated Items:** CE 023 Centrifugal Collector - High Efficiency
 CE 024 Centrifugal Collector - High Efficiency
 CE 025 Centrifugal Collector - High Efficiency
 CE 046 Wet Electrostatic Precipitator
 CE 047 Wet Electrostatic Precipitator
 CE 048 Wet Electrostatic Precipitator
 CE 049 Thermal Oxidizer
 EU 019 Dryer 5
 EU 020 Dryer 6
 EU 021 Dryer 7
 EU 108 Wellons Heat Source
 SV 002 Line 2 Rotary Dryers

What to do	Why to do it
Total Particulate Matter: less than or equal to 12 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Total Particulate Matter: less than or equal to 0.86 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 12 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.77 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
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)
Volatile Organic Compounds: less than or equal to 13 lbs/hour . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Volatile Organic Compounds: less than or equal to 0.44 lbs/ton of oven dried product (lb/ODT). VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 15 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 1.8 lbs/ton of oven dried product (lb/ODT).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 54 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 0.40 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Fuel Usage: Limited to (1) dry wood fuel; (2) wood bark fuel; (3) OSB fuel consisting of treated and clean oriented strand board trim; (4) natural gas; (5) propane; (6) alternate biomass fuels approved by the MPCA in accordance to the procedures outlines in the permit.	Minn. R. 7007.0800, subp. 2
Biomass Fuel Usage: The Permittee may use specific biomass fuel subject to approval from the MPCA. "Biomass" means the materials define in Minn. Stat. Section 216C.051, subd. 7, including herbaceous crops, trees, agricultural waste, and aquatic plant matter, and excluding mixed municipal solid waste as defined in Minn. Stat. Section 115A.03. For each biomass fuel type, the Permittee may initiate a trial period consisting of no more than 90 days where that type of fuel is combusted. In order to continue operation with this type of fuel, the Permittee shall submit a proposal, subject to MPCA written approval, providing details of the new fuel (such as proximate and ultimate analysis), the method of introduction into the combustion chamber and an estimate of the change in emissions of regulated pollutants. If the emissions change is uncertain, or an increase in emissions is indicated, the Permittee shall include a schedule for performance testing in the proposal.	Minn. R. 7007.0800, subp. 2
OPERATING REQUIREMENTS AND LIMITS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

<p>Temperature: less than or equal to 860 degrees F using 3-hour Rolling Average Inlet temperature shall not exceed 860 degrees F, unless a new maximum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the three-hour rolling average temperature goes above the maximum temperature limit, this shall be reported as a deviation.</p> <p>This limit applies only until the startup of CE 049.</p>	<p>Title I Condition: Temperature limit taken as BACT (40 CFR Section 52.21(j)); Minn. R. 7007.3000</p>
<p>The Permittee shall maintain a continuous hard copy readout or electronic file of the temperature readings and calculated three hour rolling average temperatures for the dryers inlet temperature.</p> <p>This requirement applies only until the startup of CE 049.</p>	<p>Title I Condition: Monitoring for BACT limits; Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Production: less than or equal to 45000 lbs/hour using 30-day Rolling Average of oven-dried strands.</p> <p>This limit applies only until the startup of CE 049.</p>	<p>Title I Condition: 40 CFR Section 52.21(m); Minn. R. 7007.3000</p>
<p>Daily Recordkeeping. On each day of operation, the Permittee shall calculate and record the Line 2 dryers daily strand production and the 30-day rolling average for the previous 30 days.</p> <p>This limit applies only until the startup of CE 049.</p>	<p>Title I Condition: Monitoring for BACT Limit (40 CFR 52.21 and Minn. R. 7007.3000); Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Temperature: greater than or equal to 1525 degrees F using 3-hour Rolling Average as a three-hour rolling average at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. For the first three hours after CE 049 startup, the continuous average chamber temperature shall be used instead of the 3-hour rolling average. If the three-hour rolling average temperature, or the startup chamber temperature, drops below the minimum temperature limit, this shall be reported as a deviation. This limit applies after the initial startup of CE 049.</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency (as measured from outlet of cyclones to outlet of thermal oxidizer) for Volatile Organic Compounds: greater than or equal to 90 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency (as measured from outlet of cyclones to outlet of thermal oxidizer) for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 95 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>Number of Fields On-line: greater than or equal to 2, unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the number of fields on-line recorded during the most recent MPCA approved performance test where compliance for PM and/or PM10 emissions was demonstrated. If the number of fields drops below the minimum required anytime that process gases are going through the control equipment, this shall be reported as a deviation.</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2</p>
<p>CONTROL EQUIPMENT</p>	<p>hdr</p>
<p>The Permittee shall operate and maintain the cyclones (CE 023, CE 024, CE 025), wet electrostatic precipitators (CE 046, CE 047, CE 048) and thermal oxidizer (CE 049) any time that any process equipment controlled by the wet electrostatic precipitator and thermal oxidizer is in operation. The control equipment shall be operated and maintained in accordance with the Operations and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.</p>	<p>Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 14</p>
<p>The Permittee shall maintain a continuous hard copy readout or electronic file of the temperature readings and calculated three hour rolling average temperatures for the temperature of the combustion chamber of the RTO.</p>	<p>Title I Condition: Monitoring for BACT limits; Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Daily Monitoring and Recordkeeping: The Permittee shall physically verify operation of the temperature recording device for the thermal oxidizer at least once each operating day to verify that it is working and recording properly. The Permittee shall also verify the presence of quench water flow for the electrostatic precipitators. The Permittee shall physically verify and record the number of fields on-line at least once during each operating day of operation. The Permittee shall maintain a written record of the verifications.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Monitoring Equipment: The Permittee shall install, operate, and maintain thermocouples and a monitoring device for the thermal oxidizer to conduct temperature monitoring required by this permit and to continuously indicate and record the average combustion chamber temperature of the thermal oxidizer. The Permittee shall install, operate, and maintain equipment for determining the number of fields on line for the electrostatic precipitators and for verifying the presence of quench water flow. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components, including but not limited to the electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal components, which for the thermal oxidizer shall include, but not be limited to, the refractory and heat exchanger systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the monitoring equipment at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the temperature is below the minimum specified by this permit, if the number of fields on line are below the minimum specified by this permit, or if the thermal oxidizer or electrostatic precipitators or any of their components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum, shall return the number of fields on line to at least the permitted minimum 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 appropriate control equipment. 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
CLEAN UNIT DESIGNATION	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for PM, PM10, VOCs and CO provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on startup of the RTO (CE 049) and expires 10 years after that date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000
Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for determining that the unit's control technology is comparable to BACT: 1. Heat Input Capacities: Total heat input of 135 mmBtu/hr 2. Maximum annual throughput of 262,800 ODT/yr, on a 365-day rolling sum basis 3. Operation of WESP and RTO	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000
Recordkeeping - Production rate: Once each calendar day of operation, the Permittee shall calculate and record the production of ODT for the previous twenty-four hour period. The daily production shall be added to the total daily production calculated for the previous 364 calendar days to calculate a 365-day rolling sum. The 365-day rolling sum shall be recorded daily.	Title I Condition: Monitoring for Clean Unit Designation; Minn. R. 7007.0800. subp. 4 and 5
PERFORMANCE TESTING	hdr
Initial Performance Test: due 270 days after Initial Startup of the RTO, but no later than 910 days (2 1/2 years) from permit issuance, to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, Carbon Monoxide, and Nitrogen Oxides emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 365 days after Initial Performance Test to determine Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, and Volatile Organic Compound emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
VOC Performance Tests: Whenever a performance test is conducted to measure VOC emissions, the company shall conduct a performance test for formaldehyde simultaneously with the VOC performance test for the purpose of establishing a correlation between past test procedures and recently established requirements for testing and emission factor development. Results shall be reported on (1) a carbon mass basis based on the Method 25 or 25A data alone; and (2) an "as VOC" basis, summing the Method 25 or 25A data (adjusted to a propane mass basis) and the formaldehyde test result, and correcting the results as described in AP-42 Section 10.6.1.3, dated 3/2002. The carbon mass result will be used for demonstrating compliance with the carbon mass based limit.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: GP 003 Keeler Boilers (Back-up boilers)

Associated Items: CE 039 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers
 CE 040 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers
 CE 041 Electrified Filter Bed
 EU 100 Boiler 1
 EU 101 Boiler 2
 SV 003 Keeler Boiler Stack

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.085 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.085 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
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
Carbon Monoxide: less than or equal to 1.1 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 0.40 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.30 lbs/million Btu heat input . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
OPERATING REQUIREMENTS AND LIMITS	hdr
Steam Flow: less than or equal to 36000000 lbs/year using 365-day Rolling Sum . Limit is total steam production for both boilers.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Fuel Usage: Limited to dry wood fuel. Wood waste, propane, natural gas, and up to two percent by weight of the total fuel combusted may consist of manufacturing residue or cellulose based sorbents.	Minn. R. 7007.0800, subp. 2
Manufacturing residue: The manufacturing residue must be generated on site and may consist of the following: wood flake resin and wax accumulations cleaned from equipment, confidential office records (paper) and corrugated cardboard unsuitable for recycling. In addition, the manufacturing residue shall not contain any of the following: any hazardous waste listed in Minn. R. 7045.0135, any wastes specified in Minn. R. 7045.0131 as hazardous, or batteries or any other material where mercury has been purposely introduced. Absorbent material from spills containing oil, anti-freeze, water-based paints, or soy or water-based ink may be combusted. The spilled material other than oil shall not contain: any hazardous waste listed in Minn. R. 7045.0135 or any wastes specified in Minn. R. 7045.01313 as hazardous. The oil in any absorbent material shall only be on-specification used oil.	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 and Particulate Matter < 10 micron: greater than or equal to 93 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
CONTROL EQUIPMENT	hdr
EFB Bed Voltage: greater than or equal to 3.0 kV, unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the minimum bed voltage recorded during the most recent MPCA-approved performance test where compliance for PM and/or PM10 was demonstrated. If the EFB bed voltage falls below the minimum, this shall be reported as a deviation.	Title I Condition: Monitoring for BACT Limit; Minn. R. 7007.0800, subp. 2 and 14
EFB Ionizer Voltage: greater than or equal to 13.0 kV, unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the minimum ionizer voltage recorded during the most recent MPCA-approved performance test where compliance for PM and/or PM10 was demonstrated. If the EFB ionizer voltage falls below the minimum, this shall be reported as a deviation.	Title I Condition: Monitoring for BACT Limit; Minn. R. 7007.0800, subp. 2 and 14
Recordkeeping of EFB Bed Voltage and EFB Ionizer Voltage. Once each day while in operation, the Permittee shall monitor and record the bed voltage and ionizer voltage. The Permittee shall record the time and date of each bed voltage and ionizer voltage reading and whether or not the recorded measurement was within the range specified in this permit.	Title I Condition: Monitoring for BACT Limit; Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the cyclones and EFB any time that any process equipment controlled by the control equipment is in operation. The control equipment shall be operated and maintained in accordance with the Operations and Maintenance (O&M) Plan. The Permittee shall keep copies of the O&M Plan available onsite for use by staff and MPCA staff.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 14
The Permittee shall maintain a hard copy or electronic file of the monitored parameters for the EFB.	Title I Condition: Monitoring for BACT Limit; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Daily Monitoring: The Permittee shall physically verify the monitoring device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of the verification.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain monitoring equipment to conduct monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components, including but not limited to the electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate all monitoring equipment at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the monitored parameters are outside the ranges specified by this permit or if the control equipment or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the monitored parameters to within the permitted range 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 control equipment. 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 730 days after Permit Issuance to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, Carbon Monoxide, and Nitrogen Oxides emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
RECORDKEEPING	hdr
Daily Recordkeeping. On each day of operation, the Permittee shall calculate and record, and maintain records of, the production of steam for the previous twenty-four hour period. The daily steam production shall be added to the total daily steam production calculated for the previous 364 calendar days to calculate a 365-day rolling sum. The 365-day rolling sum shall be recorded daily.	Title I Condition: Monitoring for BACT Limit (40 CFR 52.21 and Minn. R. 7007.3000); Minn. R. 7007.0800, subp. 4 and 5
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record, and maintain records of, the total weight of fuel fed to the boilers, as well as the total weight of the manufacturing residue and absorbent material added to the boiler fuel stream.	Minn. R. 7007.0800, subp. 4 and 5
Monthly Recordkeeping - By the 15th day of each month, the Permittee shall calculate and record the monthly average weight percentage of manufacturing residue and absorbent material burned in the boilers for the previous month. This percentage shall be compared to the limit.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: EU 036 Line I Blending System

Associated Items: CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 012 Centrifugal Collector - Medium Efficiency
 SV 007 Blending Baghouse System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.3 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 365 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 38,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: EU 040 Line II Dry Fuel Preparation System

Associated Items: CE 035 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 036 Centrifugal Collector - Medium Efficiency
 SV 014 Dry Fuel Prep

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.17 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 730 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 5,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 050 Line I Sawline System

Associated Items: CE 015 Centrifugal Collector - Medium Efficiency

CE 016 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 009 Sawline Baghouse System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.1 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 1,825 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 33,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: EU 051 Line I Sanding System

Associated Items: CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 CE 018 Centrifugal Collector - Medium Efficiency
 SV 010 Sanding Baghouse System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.9 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 365 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 55,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 053 Line 2 Sawline System

Associated Items: CE 032 Centrifugal Collector - Medium Efficiency

CE 033 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 014 Dry Fuel Prep

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.2 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 365 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 35,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 062 Line I Forming System

Associated Items: CE 013 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 014 Centrifugal Collector - Medium Efficiency

SV 008 Forming Baghouse System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 1.2 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 1,825 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 35,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: EU 090 Line I Hogged Fuel System

Associated Items: CE 021 Centrifugal Collector - Medium Efficiency
 CE 022 Fabric Filter - Low Temperature, i.e., T<180 Degrees F
 SV 012 Hogged Fuel System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.41 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 1,460 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 12,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 094 Line I Dry Fuel System

Associated Items: CE 019 Centrifugal Collector - Medium Efficiency

CE 020 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 011 Dry Fuel Baghouse System

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.0040 grains/dry standard cubic foot . This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.0040 grains/dry standard cubic foot	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.21 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter and Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
MONITORING	hdr
Visible Emissions: For each baghouse listed as associated items, the Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection or pressure drop reading, and whether or not any visible emissions were observed, or whether or not the observed pressure drop was within the range specified in the Operation and Maintenance Plan.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 4 and 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: Monitoring for Title I Limit (40 CFR Section 52.21); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the specified operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range 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 fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring pressure drop as required by this permit.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the external control equipment components. At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the internal control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 1,095 days after Permit Issuance to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits; Minn. R. 7017.2020, subp. 1
CLEAN UNIT	hdr
Clean Unit Designation: This unit qualifies as a Clean Unit for Total Particulate Matter and Particulate Matter less than 10 microns provided the Permittee complies with the provisions of 40 CFR Section 52.21(y). This designation is effective on issuance date of this permit and expires on date 10 years from permit issuance date.	Title I Condition: 40 CFR Section 52.21(y)(8) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Basis for Clean Unit Designation. In addition to the other related Title I limits contained in this permit, the following parameters formed the basis for the BACT Determination: Flowrate of 6,000 dscfm.	Title I Condition: 40 CFR Section 52.21(y)(8)(iv) and Minn. R. 7007.3000
To maintain the Clean Unit designation, the Permittee must conform to all the restrictions listed in 40 CFR Section 52.21(y)(9). Failure to do so results in the unit losing the Clean Unit designation.	Title I Condition: 40 CFR Section 52.21(y)(9) and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 109 Fire Pump Engine**Associated Items: SV 016 Diesel Fire Pump Engine**

What to do	Why to do it
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (emission rate is 0.70 lb/hr based on equipment design).	Minn. R. 7011.2300, subp. 2
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Fuels allowed: distillate fuel oil only.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 110 Diesel Generator**Associated Items:** SV 015 Diesel Generator

What to do	Why to do it
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (emission rate is 0.48 lb/hr based on equipment design).	Minn. R. 7011.2300, subp. 2
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Fuels allowed: distillate fuel oil only.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji
 Permit Number: 05700005 - 001

Subject Item: EU 128 Power Cogeneration Boiler

Associated Items: CE 037 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones
 CE 038 Electrostatic Precipitator - High Efficiency
 CE 050 Selective Noncatalytic Reduction for NOX
 SV 004 Power Boiler (Co-gen)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.030 lbs/million Btu heat input . This limit is more stringent than the limit in 40 CFR Section 60.43b(c)(1) which also applies (the NSPS limit is 0.10 lb/mmBtu).	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.030 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 27 percent opacity. The opacity standard shall apply at all times except during periods of startup, shutdown, or malfunction.	40 CFR Section 60.43b(f) and 60.43b(g)
Carbon Monoxide: less than or equal to 0.20 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.080 lbs/million Btu heat input . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 0.20 lbs/million Btu heat input using 24-hour Rolling Average	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
OPERATING REQUIREMENTS AND LIMITS	hdr
Fuel Usage: Limited to dry wood fuel. Wood waste, propane, natural gas, and up to one percent by weight of the total fuel combusted may consist of manufacturing residue or cellulose based sorbents.	Minn. R. 7007.0800, subp. 2
Manufacturing residue: The manufacturing residue must be generated on site and may consist of the following: wood flake resin and wax accumulations cleaned from equipment, confidential office records (paper) and corrugated cardboard unsuitable for recycling. In addition, the manufacturing residue shall not contain any of the following: any hazardous waste listed in Minn. R. 7045.0135, any wastes specified in Minn. R. 7045.0131 as hazardous, or batteries or any other material where mercury has been purposely introduced. Absorbent material from spills containing oil, anti-freeze, water-based paints, or soy or water-based ink may be combusted. The spilled material other than oil shall not contain: any hazardous waste listed in Minn. R. 7045.0135 or any wastes specified in Minn. R. 7045.01313 as hazardous. The oil in any absorbent material shall only be on-specification used oil.	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 and Particulate Matter < 10 micron: greater than or equal to 95 percent control efficiency	Title I Condition: 40 CFR Section 52.21 (BACT and modeling); Minn. R. 7007.0800, subp. 2 and 14
Number of Fields On-line: greater than or equal to 2, unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the number of fields on-line recorded during the most recent MPCA approved performance test where compliance for PM and/or PM10 emissions was demonstrated. If the number of fields drops below the minimum required, this shall be reported as a deviation. The Permittee shall physically check and record the number of fields on-line at least once during each operating day of operation.	Title I Condition: Monitoring for BACT limit; Minn. R. 7007.0800, subp. 2
SNCR Operating Parameters: Once each day while in operation, the Permittee shall physically check and record that the metering system is energized and that the circulation pumps are operating. If the system is not energized or the pumps are not operating, this shall be reported as a deviation.	Title I Condition: Monitoring for BACT limit; Minn. R. 7007.0800, subp. 2
The Permittee shall operate and maintain the cyclones, ESP and SNCR any time that any process equipment controlled by the control equipment is in operation.	Title I Condition: Monitoring for BACT limit; Minn. R. 7007.0800, subp. 2 and 14
Daily Monitoring: The Permittee shall physically verify the monitoring devices at least once each operating day to verify that they are working and recording properly. The Permittee shall maintain a written record of the verifications.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain monitoring equipment to conduct monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal system components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate all monitoring equipment at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the monitored parameters are outside the ranges specified by this permit or if the control equipment or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the monitored parameters to within the permitted range 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 control equipment. 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
The Permittee shall operate and maintain the control equipment 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
PERFORMANCE TESTING	hdr
Initial Performance Test: due 730 days after Permit Issuance to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, and Carbon Monoxide emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
COMS REQUIREMENTS	hdr
Continuous Operation: COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A COMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime includes reasonable periods as listed in Items A, B, C and D of Minn. R. 7017.1090, subp. 2.	Minn. R. 7017.1090, subp. 1; 40 CFR Section 60.13(e)
COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily according to the requirements of 40 CFR 60.13(d)(2). The zero and upscale calibration levels must be determined using the span value. The span value shall be between 60% and 80%.	Minn. R. 7017.1210, subp. 2; 40 CFR Section 60.13(d); 40 CFR Section 60.48b(e)(1)
COMS Calibration Error Audit: due before end of each calendar half-year following Permit Issuance. Conduct three point calibration error audits at least 3 months apart but no greater than 8 months apart. Conduct audits in accordance with Minn. R. 7017.1210, subp. 3.	Minn. R. 7017.1210, subp. 3
COMS Calibration Error Audit Results Summary: due 30 days after end of the calendar quarter in which the COMS Calibration Error Audit was completed.	Minn. R. 7017.1220
Attenuator Calibration: The Permittee shall perform an attenuator calibration in accordance with Minn. R. 7017.1210, subp. 4.	Minn. R. 7017.1210, subp. 4
All COMS shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data for each successive 6-minute period. The Permittee shall reduce all COMS data to 6-minute averages in accordance with Minn. R. 7017.1200, subp. 2 and 3 and 40 CFR 60.13(h).	Minn. R. 7017.1200, subp. 1, 2 & 3; 40 CFR Section 60.13(e)(1); 40 CFR Section 60.13(h)
Emissions Monitoring: The owner or operator shall use a COMS to measure opacity emissions from EU 128.	Minn. R. 7017.1006; 40 CFR Section 60.48b(a).
Recordkeeping: The owner or operator must retain records of all COMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130
QA Plan Required: Develop and implement a written quality assurance plan which covers each COMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1.	Minn. R. 7017.1210
CEMS REQUIREMENTS	hdr
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The span value used shall be 1.5 times the emission limit, and shall be used to determine the zero and span calibration points. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Cylinder Gas Audit (CGA): due before end of each calendar half-year following Permit Issuance. Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F, Section 5.1.2.	Minn. R. 7017.1170, subp. 4
Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of the calendar quarter in which the Cylinder Gas Audit (CGA) was completed.	Minn. R. 7017.1180, subp. 1
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year following Permit Issuance. If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months. Follow the procedures in 40 CFR pt. 60, Appendix Appendix F.	Minn. R. 7017.1170, subp. 5
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA).	Minn. R. 7017.1180, subp. 2
Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar quarter in which the CEMS RATA was conducted.	Minn. R. 7017.1180, subp. 3
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime includes reasonable periods as listed in Items A, B, C and D of Minn. R. 7017.1090, subp. 2.	Minn. R. 7017.1090, subp. 1
All CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. The Permittee shall reduce all CEMS data to 1-hour averages in accordance with Minn. R. 7017.1160 and 40 CFR 60.13(h).	Minn. R. 7017.1140; Minn. R. 7017.1160; Minn. R. 7007.0800, subp. 4; 40 CFR Section 60.13(e)(2); 40 CFR Section 60.13(h)
Emissions Monitoring: The owner or operator shall use a NOx CEMS to measure NOx emissions from EU 128.	Title I Condition: Monitoring for BACT limit; Minn. R. 7017.1006
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7007.1130
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain all of the information required by 40CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2
RECORDKEEPING	hdr
The Permittee shall maintain a hard copy or electronic file of the monitored parameters for the ESP.	Title I Condition: Monitoring for BACT Limit; Minn. R. 7007.0800, subp. 4 and 5
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record, and maintain records of, the total weight of fuel fed to the boilers, as well as the total weight of the manufacturing residue and absorbent material added to the boiler fuel stream.	Minn. R. 7007.0800, subp. 4 and 5
Monthly Recordkeeping - By the 15th day of each month, the Permittee shall calculate and record the monthly average weight percentage of manufacturing residue and absorbent material burned in the boilers for the previous month. This percentage shall be compared to the limit.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 129 Line 1 Press

Associated Items: SV 005 Board Press Line 1

What to do	Why to do it
LIMITS	hdr
Total Particulate Matter: less than or equal to 15 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act. This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Minn. Stat. 116.07, subd. 4a
Total Particulate Matter: less than or equal to 0.51 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 15 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.51 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Carbon Monoxide: less than or equal to 0.15 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 4.5 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 15 lbs/hour . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Volatile Organic Compounds: less than or equal to 1.5 lbs/ton of finished product . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
PERFORMANCE TESTING	hdr
Initial Performance Test: due 180 days after Initial Startup of Line 1 dryer new burners (EU 134, EU 135) but no later than 730 days from permit issuance, to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, and Carbon Monoxide emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 365 days after Initial Performance Test to determine Total Particulate Matter, Particulate Matter less than 10 microns, and Volatile Organic Compound emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 1,095 days after Initial Performance Test to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Volatile Organic Compound emissions. (Test within 3 years of initial performance test.)	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
VOC Performance Tests: Whenever a performance test is conducted to measure VOC emissions, the company shall conduct a performance test for formaldehyde simultaneously with the VOC performance test for the purpose of establishing a correlation between past test procedures and recently established requirements for testing and emission factor development. Results shall be reported on (1) a carbon mass basis based on the Method 25 or 25A data alone; and (2) an "as VOC" basis, summing the Method 25 or 25A data (adjusted to a propane mass basis) and the formaldehyde test result, and correcting the results as described in AP-42 Section 10.6.1.3, dated 3/2002. The carbon mass result will be used for demonstrating compliance with the carbon mass based limit.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Subject Item: EU 130 Line 2 Press

Associated Items: SV 006 Board Press Line 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 10 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act. This is more stringent than limit in Minn. R. 7011.0715, subp. 1(A), which also applies.	Minn. Stat. 116.07, subd. 4a
Total Particulate Matter: less than or equal to 0.34 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 10 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.34 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 4.5 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 0.15 lbs/ton of finished product	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 15 lbs/hour . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. Stat. 116.07, subd. 4a
Volatile Organic Compounds: less than or equal to 0.61 lbs/ton of finished product . VOC, as carbon, shall be measured by Method 25 or 25A or by an alternate or equivalent method approved by the agency.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
PERFORMANCE TESTING	hdr
Initial Performance Test: due 270 days after Initial Startup of the Line 2 dryer RTO (CE 049), but no later that 910 days (2 1/2 years) from permit issuance, to determine opacity and Total Particulate Matter, Particulate Matter less than 10 microns, Volatile Organic Compound, and Carbon Monoxide emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 365 days after Initial Performance Test to determine Total Particulate Matter, Particulate Matter less than 10 microns, and Volatile Organic Compound emissions.	Title I Condition: Monitoring for BACT limits; Minn. R. 7017.2020, subp. 1
SCHEDULE OF COMPLIANCE REQUIREMENTS	hdr
NESHAP Required Control: The Permittee shall begin installation of any control required by the Plywood and Composite Wood Products NESHAP, upon its promulgation, prior to installation of the NESHAP-required control at the two other Potlatch OSB uncontrolled presses in Minnesota. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Schedule of Compliance, signed 8/5/03)
NESHAP Compliance Demonstration: The Permittee shall demonstrate compliance with the Plywood and Composite Wood Products NESHAP standard on the Line 2 Press (EU 130) a minimum of 12 months prior to the compliance date as set in the NESHAP. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Schedule of Compliance, signed 8/5/03)
Alternate Compliance Requirement: If the control required by the Plywood and Composite Wood NESHAP is not thermal oxidizer technology, then the Permittee shall retro-fit diesel-fueled school buses from area school districts with in-line pollution control equipment. Such retrofitting shall be completed within 24 months of the promulgation date of the NESHAP. The school bus retro-fit project shall consist of 15 buses or a total expenditure of \$50,000, whichever occurs first. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Schedule of Compliance, signed 8/5/03)
VOC Performance Tests: Whenever a performance test is conducted to measure VOC emissions, the company shall conduct a performance test for formaldehyde simultaneously with the VOC performance test for the purpose of establishing a correlation between past test procedures and recently established requirements for testing and emission factor development. Results shall be reported on (1) a carbon mass basis based on the Method 25 or 25A data alone; and (2) an "as VOC" basis, summing the Method 25 or 25A data (adjusted to a propane mass basis) and the formaldehyde test result, and correcting the results as described in AP-42 Section 10.6.1.3, dated 3/2002. The carbon mass result will be used for demonstrating compliance with the carbon mass based limit.	Minn. R. 7007.0800, subp. 2

TABLE B: SUBMITTALS

06/21/04

Facility Name: Potlatch - Bemidji
Permit Number: 05700005 - 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:

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

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup of CE 049. Submit the name and number of the control device and the actual date of initial startup of the control device. The notification shall also state the effective and expiration dates of the Clean Unit Designation.	GP002
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup of EU 134 and EU 135 (new burners for Line 1 dryers).	GP001
Notification	due 10 days after Equipment Installation, if needed, of in-line pollution control equipment on last bus. The notification shall include a letter(s) from the affected school district(s) verifying that the installations are complete. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	EU130
Notification	due 10 days after Initial Startup of any NESHAP-required control. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	EU130
Notification	due 10 days after Start Of Construction of any NESHAP-required control. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	EU130
Testing Frequency Plan	due 60 days after Initial Performance Test for Total Particulate Matter, Particulate Matter less than 10 micron, Volatile Organic Compound, and Carbon Monoxide emissions. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on one-year (12 month), 36 month, and 60 month intervals, or as applicable, shall be required upon written approval of the MPCA.	EU128
Testing Frequency Plan	due 60 days after Performance Test (the performance test due within 1 year of initial performance test) for Total Particulate Matter, Particulate Matter less than 10 microns, Carbon Monoxide, and Volatile Organic Compound emissions. The plan shall specify a testing frequency based on the consideration of such things as the variability of test results, how close test results are to emission factors used in calculation of projected actuals calculations, and how close the actual facility increases are to the PSD significance thresholds. Future performance tests shall be required upon written approval of the MPCA.	EU130

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

Testing Frequency Plan	due 60 days after Performance Test (the performance test due within 1 year of initial performance test) for Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, Carbon Monoxide, and Volatile Organic Compound emissions. The plan shall specify a testing frequency based on the consideration of such things as the variability of test results, how close test results are to emission factors used in calculation of projected actuals calculations, and how close the actual facility increases are to the PSD significance thresholds. Frequency for VOC tests should also consider the length of time since the last changeout of RTO media (e.g. if more than four years since changeout, frequency between tests should be shorter). Future performance tests shall be required upon written approval of the MPCA.	GP002
Testing Frequency Plan	due 60 days after Performance Test (the performance test due within 3 years of initial performance test) for Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, Carbon Monoxide, and Volatile Organic Compound emissions. The plan shall specify a testing frequency based on the consideration of such things as the variability of test results, how close test results are to emission factors used in calculation of projected actuals calculations, and how close the actual facility increases are to the PSD significance thresholds. Frequency for VOC tests should also consider the length of time since the last changeout of RTO media (e.g. if more than four years since changeout, frequency between tests should be shorter). Future performance tests shall be required upon written approval of the MPCA.	GP001
Testing Frequency Plan	due 60 days after Performance Test (the performance test due within 3 years of initial performance test) Total Particulate Matter, Particulate Matter less than 10 microns, Carbon Monoxide, and Volatile Organic Compound emissions. The plan shall specify a testing frequency based on the consideration of such things as the variability of test results, how close test results are to emission factors used in calculation of projected actuals calculations, and how close the actual facility increases are to the PSD significance thresholds. Future performance tests shall be required upon written approval of the MPCA.	EU129

TABLE B: RECURRENT SUBMITTALS

06/21/04

Facility Name: Potlatch - Bemidji

Permit Number: 05700005 - 001

What to send	When to send	Portion of Facility Affected
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Permit Issuance (Submit Deviations Reporting Form DRF-1 as amended). The NOx CEMS EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU128
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Permit Issuance (Submit Deviations Reporting Form DRF-1 as amended). The COMS EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU128
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 Initial Startup of CE 049. The Annual Report shall provide actual emissions for the project affected units, and shall compare the overall change in emissions to the PSD Significant Threshold levels. Emissions of VOCs shall be corrected as needed and reported as VOCs. The emission numbers that were used to approve the permit are provided in Appendix E of this permit. The Annual Report shall follow this format.	Total Facility
Compliance Certification	due 31 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: Potlatch - Bemidji
Permit Number: 05700005-001

- Appendix A (not used in this permit)
- Appendix B List of Insignificant Activities
- Appendix C Stack Parameters
- Appendix D Fugitive Dust Control Plan
- Appendix E Applicability Analysis

Appendix B
List of Insignificant Activities

Under Minn. R. 7007.1250, subp. 1(A), the Permittee may add insignificant activities to the stationary source throughout the term of the permit without getting permit amendments. Certain exclusions apply and are listed in Minn. R. 7007.1250, subp. 2.

The following sources at the Permittee’s facility qualify as insignificant activities under Minn. R. 7007.1300, subs. 2, 3 and 4 and are not required to be listed in the permit.

Minn. R. 7007.1300, subp.	Rule Description of the Activity	General Applicable Requirement
3(H)(6)	Equipment used exclusively for melting or application of wax. <i>Potlatch - Bemidji has two 13,000 gal. emulsified wax storage tanks</i>	Minn. R. 7011.0715 (PM and opacity)
3(I)	Individual emission units at a stationary source which each have a potential to emit for each of the following pollutants less than: (1) 4,000 pounds per year of CO; or (2) 2,000 pounds per year each of PM, PM ₁₀ , NO _x , SO ₂ , and VOCs. <i>Emission units that Potlatch – Bemidji has that qualify under this subpart include:</i> <ul style="list-style-type: none"> • <i>Bark piles</i> • <i>Radial stacker</i> • <i>Line 1 dryer emergency outfeeds</i> • <i>Line 2 dryer emergency outfeeds</i> 	Minn. R. 7011.0715 (PM and opacity)
4(B)	Emission units with potential emissions of less than 2.28 lb/hr or actual emissions of less than 1.0 lb/hr of PM, PM ₁₀ , NO _x , SO ₂ , and VOCs. <i>Emission units that Potlatch - Bemidji has that qualify under this subpart include:</i> <ul style="list-style-type: none"> • <i>Parts washer – maintenance shop</i> • <i>Yard hog</i> • <i>Keeler EFB Baghouse</i> 	Minn. R. 7011.0715 (PM and opacity)

APPENDIX C

Modeling Parameters (as of 12/3/03)

Facility Name: Potlatch Corporation – Bemidji OSB

Permit Number: 05700005-001

ID	Description	Stack Height (ft)	Stack Temp. (°F)	Stack Exit Velocity (ft/min)	Stack Diam. (ft)	NO _x (lb/hr)	CO (lb/hr)	PM ₁₀ (lb/hr)
GP 001	Line 1 dryers	135	260	3898	7	51	20	12
GP 002	Line 2 dryers	135	260	1733	10.5	54	40	12
GP 003	Keeler Boilers	110	450	5612	4.3	56	154	11.9
EU 036	Line 1 Blending System	62	68	3534	3.7	---	---	1.3
EU 040	Line 2 Dry Fuel Prep System	40	68	873	2.7	---	---	0.17
EU 050	Line 1 Sawline System	45	68	3242	3.6	---	---	1.13
EU 051	Line 1 Sanding System	54	68	1710	6.4	---	---	1.89
EU 053	Line 2 Sawline System	46	68	1238	6	---	---	1.2
EU 062	Line 1 Forming System	61	68	3255	3.7	---	---	1.2
EU 090	Line 1 Hogged Fuel System	33	68	1949	2.8	---	---	0.41
EU 094	Line 1 Dry Fuel System	33	68	1130	2.6	---	---	0.21
EU 128	Power Cogeneration Boiler	110	300	3977	6	46.4	46.4	6.96
EU 129	Line 1 Press	138	122	4482	5	2.4	4.5	15
EU 130	Line 2 Press	138	110	5093	5	2.35	4.5	10.2

Appendix D
Fugitive Dust Control Plan

Appendix E
Applicability Analysis

TECHNICAL SUPPORT DOCUMENT
for
AIR EMISSION PERMIT NO. 05700005-001

This technical support document is intended for all parties interested in the draft permit and to meet the requirements that have been set forth by the federal regulations and state rules (40 CFR, Section 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 draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Stationary Source/Address (SIC Code: 2493)
Potlatch Corporation 29647 US Hwy 2 Bemidji, MN 55601 Hubbard County
Contact: Michael Twite (218) 327-3655

1.2. Description Of The Permit Action

Potlatch Corporation owns and operates an oriented strandboard (OSB) manufacturing facility in Hubbard County, Minnesota (Facility). The Facility is located approximately 10 miles southeast of Bemidji, Minnesota on Hwy. 2. The existing Facility consists of two OSB manufacturing lines. To produce OSB, logs are debarked and reduced into small strands, which are then dried, blended with a phenol-formaldehyde resin and wax mixture, formed into layers, and finally pressed into wood panels. Line 1 consists of four wood-strand triple pass rotary dryers heated with exhaust from two wood dust suspension burners, two hogged fuel boilers providing backup steam to the process, and one board press. Line 2 consists of three wood-strand triple pass rotary dryers, heated with exhaust from a wood-fired thermal oil heater, and one board press. Various handling, finishing, and forming processes are also part of Line 1 and Line 2. The Facility also operates a wood-fired cogeneration boiler that provides steam to the Line 1 press, log ponds, some building heat, and supplies electricity to the power grid.

The Facility is an existing major source under Federal New Source Review regulations. The Facility is also a major source of hazardous air pollutant (HAP) emissions.

The pollution control equipment and main pollutants of concern from the emission units at the Facility are as follows: the Line 1 rotary dryers and associated burners are sources of particulate matter (PM and PM₁₀); volatile organic compounds (VOCs); carbon monoxide (CO); and nitrogen oxides (NO_x). The dryers and burners are currently controlled by two wet electrostatic precipitators (WESP) followed by a regenerative thermal oxidizer (RTO) which controls PM, PM₁₀, VOCs and CO. The Line 2 dryers are also sources of PM, PM₁₀, VOCs, CO and NO_x. Each Line 2 dryer is currently controlled by a WESP (for particulate matter) and a dryer inlet temperature limitation, which serves to limit VOC emissions. The presses for both lines are uncontrolled and are primarily sources of VOC, but also particulates. The cogeneration boiler is controlled by a cyclone and an electrostatic precipitator (ESP) for control of PM and PM₁₀ and selective non-catalytic reduction (SNCR) for control of NO_x. The back-up Keeler boilers are

sources of PM, PM₁₀, VOC, CO and NO_x and are controlled by multiclones and an electrified filter bed (EFB); the boilers also have a steam-production limit. The in-plant particulate sources (e.g. the handling, finishing and forming processes) are generally controlled by baghouses. There are also fugitive particulate sources such as bark and fuel piles and paved and unpaved roads.

1.3 Description of any changes allowed with this permit issuance

Potlatch is proposing to modify its mill in a modification that is being incorporated into the Title V permit. Potlatch will install two additional burners on the Line 1 dryer system and will install a thermal oxidizer (TO) on the Line 2 dryer system. Installation of the TO will allow Potlatch to remove the Line 2 dryer inlet temperature limit previously established as a Best Available Control Technology (BACT) limit. These modifications will result in increased production for the Facility. Further information on the modification can be found in section 3.1 of this document.

1.4 Permitting History.

Permit Number and Issuance Date	Action Authorized
30C-79-I-1 (6/26/79)	Prevention of Significant Deterioration (PSD) Installation Permit
30C-85-OT-1 (7/26/85)	Operating Permit for Operation of an OSB Plant and Air Pollution Control Equipment
Amendment No. 1 to 30C-85-OT-1 (11/15/85)	Addition of pollution control equipment to control particulate to keep Facility synthetic minor for federal PSD program.
30C-89-I/O-1 (5/23/89)	PSD permit for expansion of Facility (addition of Line 2).
Am. No. 2 to 30C-85-OT-1 (10/6/89)	Corrected permit limits; extend dryer stacks, combine press vents into one stack; replace venturi scrubber with EFB; addition of formaldehyde limits
30C-90-I/O-1 (11/27/90)	PSD permit for addition of wood-fired cogeneration boiler
Compliance agreement (1/94)	Required installation of BACT on dryers on Line 1.
Am. No. 1 to 30C-90-I/O-1 (9/30/94)	Installation of SNCR for control of NO _x on cogeneration boiler (result of updated BACT analysis).
Am. No. 1 to 30C-89-I/O-1 (9/30/94)	Changes in emission limits due to updated BACT analysis.
05700005-005 (3/9/95)	Backwards PSD permit for Line 1. Required installation of WESP/RTO as BACT on dryers; established emission limits.
05700005-009 (8/26/96)	Change requirements for monitoring recordkeeping and reporting.
Supplemental BACT analysis (12/96)	Permit 05700005-005 allowed for supplemental BACT analysis to be performed to determine whether WESP/RTO still appropriate control for dryers. WESP/RTO was determined to still be BACT.
Notification – Contravening permit terms (6/23/97)	Potlatch notified of intent to install one seven-can RTO rather than two five-can RTOs for control of Line 1 dryers.
Notification (10/22/97)	Replacing baghouse
05700005-010 (5/12/98)	Major permit amendment. Changes for operating hours for back-up boilers; updated BACT analysis required as part of permitting process.
Notification (4/5/99)	Replacing baghouse
Am. 30C-89-I/O-1 (12/4/00)	Amendment to change averaging time for Line 2 press production limit.
Notification (3/5/01)	Replacing EFBs with WESPs on Line 2 dryers.
Am. to 05700005-005	Amendment to change averaging time for Line 1 press production limit.

Permit Number and Issuance Date	Action Authorized
(11/7/02)	
8/05/03	Compliance agreement – allowed for increased throughput on Line 2 Press; overall Facility production did not increase.

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	Total HAPs tpy
Line 1 Dryers	53	53	1.8	220	66	79	43
Line 1 Press	53	66	--	11	20	66	130
Line 2 Dryers	53	53	15	240	66	58	43
Line 2 Press	45	45	--	10	20	66	130
Keeler (back-up) Boilers	2.7	2.7	0.79	13	35	9.5	0.34
Co-generation Boiler	31	31	25	200	200	81	13
Baghouse-controlled systems	33	33	--	--	--	15	29
Fugitive Sources	12	1.9	--	--	--	--	--
Total Facility Limited Potential Emissions after Modification ^(a)	280	280	43	700	410	370	390
Current Total Facility Limited Potential Emissions (prior to modification)	330	320	43	650	490	440	(b)

(a) Numbers may not appear to add properly due to rounding

(b) Total HAPs not previously calculated

Table 2. Facility Classification

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

2. Regulatory and/or Statutory Basis

New Source Review

The Facility is an existing major source under New Source Review (NSR) regulations. The modification incorporated into this permit utilized the NSR reform applicability test; the modification was determined not to be major for PSD. Several emission units were also designated as Clean Units, using the provisions in the NSR Reform regulations.

Part 70 Permit Program

The Facility is a major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

The following New Source Performance Standards are applicable to the operations at this Facility:

Subp. Db Industrial-Commercial-Institutional Steam Generators > 100 MMBtu

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The Facility is a major source under 40 CFR § 63; however, the Facility is not currently subject to any NESHAPs. There are two NESHAPs which have been proposed at the time of this permit which are likely to apply to the Facility. These NESHAPs are the Plywood and Composite Wood Products MACT (Subp. DDDD) as well as the Industrial/Commercial/ Institutional Boilers and Process Heaters MACT standard (Subp. DDDDD).

Minnesota State Rules

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

- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment
- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

Table 3 Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
GP 001, GP 002 Line 1 Dryers, Line 2 Dryers	40 CFR § 52.21	PSD. BACT limits set for PM, PM ₁₀ , NO _x , CO, VOC. Emission units have been designated as Clean Units.
	Minn. R. 7011.0610	Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
GP 003 Keeler Back-up Boilers	40 CFR § 52.21	PSD. BACT limits set for PM, PM ₁₀ , NO _x , CO, VOC, steam production.
	Minn. R. 7011.0515	Standards of Performance for New Indirect Heating Equipment
Various EU xxx - Processes controlled by baghouses	40 CFR § 52.21	PSD. BACT limits set for PM, PM ₁₀ , VOC. Emission units have been designated as Clean Units.
	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment
EU 128 Co-gen Boiler	40 CFR § 52.21	PSD. BACT limits set for PM, PM ₁₀ , NO _x , CO, VOC.
	40 CFR pt. 60, subp. Db	NSPS: Industrial-Commercial-Institutional Steam Generators > 100 MMBtu
EU 129, EU 130 Line 1, Line 2 Presses	40 CFR § 52.21	PSD. BACT limits set for PM, PM ₁₀ , VOC.
	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process 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. 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 New Source Review

3.1.1 PSD Applicability

Potlatch used the new applicability methodology, from the 2003 NSR reform regulations, to determine if the proposed project is a major modification under PSD. The new actual-to-projected actual applicability test applies to changes at existing emissions units. The emissions increase for the existing unit is determined by comparing baseline actual emissions to projected actual emissions. The Permittee must make a projection of post-change annual emissions during the five or 10 years following the change (depending on if the change increases the capacity of the existing emissions unit).

The calculations used in determining the applicability are included in the permit as Appendix E. A summary of the calculations is shown below:

Pollutant	Projected Actual	Demand Adjustment	Final Projected Actual	Past Actual	Change in Emissions	PSD Signif. Emission Level
PM	123.1	3.5	120	113.5	6.2	25
PM ₁₀	97.7	4.1	94	87.1	6.5	15
SO ₂	15.3	1.3	14	13.6	0.3	40
NO _x	218	18.5	199	184	15.5	40
CO	108	4.7	103	79.5	23.7	100
VOC	176	8.4	168	130	37.9	40

The emission rates used for the projected actual emission calculations were in many cases much less than the emission limits proposed for the permit. If the emission limits were used as the projected actuals in the applicability analysis, the change in emissions would be over the PSD thresholds (with the exception of SO₂). Given the difference in the projected actual emission rates and the emission limits, and the potential for the change in emissions to be over the PSD thresholds, Potlatch has an increased testing frequency for the dryers and presses to verify the future actual emissions. The Line 1 dryers and press will be tested within 180 days after startup of the new dryer burners, then again one year after this initial test, and three years after the initial test. The frequency of additional testing will be determined following this third test; the frequency will be based upon consideration of the variability of the past test results, and how close the actual emission rates were to the calculated projected actual emission rates, and to the PSD significant thresholds. The Line 2 dryers and press will be tested within 270 days of startup of the RTO (additional time after startup is needed to give the facility time for shakedown of the new equipment). An additional test is required within one year of the first test. The frequency of

additional testing will be determined following this second test (a third test was not included in this permit, as it was for the Line 1 dryers and press, because a third test would not be within the five-year permit lifetime); the frequency will be based upon consideration of the variability of past test results, and how close the actual emission rates were to the calculated projected actual emission rates, and to the PSD significant thresholds. The suggested testing frequency for VOC for the Line 1 and Line 2 dryers should also consider the elapsed time since the most recent changeout of media in the RTO. Testing of the Line 1 dryers has shown a marked decrease in VOC destruction efficiency when the media has been in place for more than four years. Therefore, if the media has not been replaced within about four years, then it would be expected that VOC testing should be performed annually, until the media is replaced.

Potlatch must keep track of the actual emissions for ten years from the change for both the Line 1 and 2 dryer systems, since the capacity for these systems has increased with the modifications. Records need to be kept for five years from the changes for the remainder of the units affected by the change, i.e. the presses and baghouse-controlled systems.

3.1.2 Clean Unit Designation

Another aspect of the NSR Reform regulations that Potlatch is using in their permit modification is to identify certain emission units as Clean Units. A Clean Unit is an emissions unit that:

- has been issued a major NSR permit requiring compliance with Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER), is complying with BACT or LAER requirements, and is meeting the requirements of 40 CFR 52.21(x), or
- has been designated as a clean unit based on achieving an emission limitation deemed comparable to BACT, as defined at 40 CFR 52.21(y).

Changes at Clean Units are exempt from NSR review if the change does not cause the Clean Unit to exceed its permitted allowable emissions or require modification of its work practice requirements. Clean Unit status can be valid for up to 10 years after startup of the Clean Unit's control technology or work practices, or depending on the situation, 10 years after permit issuance. In any case the Clean Unit Designation cannot be effective prior to March 3, 2003. Also, an emissions unit may re-qualify for Clean Unit status if the Clean Unit Designation (CUD) expires or is lost due to modification. A facility can re-qualify either by going through BACT again or by going through the comparable-to-BACT process.

Some of the Facility's wood handling systems, controlled by baghouses, were designated as existing Clean Units, and thus emissions from these systems were not included in the calculations for the Applicability Analysis. The Line 1 dryers were considered Clean Units, but the changes proposed as part of the modification caused the dryers to lose this status. However, as part of this permit, the Line 1 dryers, as well as the Line 2 dryers, and all the wood handling systems controlled by baghouses, are re-qualifying through the comparable-to-BACT process. Therefore, these emission units are designated as Clean Units in the permit. The Line 2 dryers Clean Unit status will begin upon startup of the RTO, and will expire 10 years after that startup. The Clean Unit status for the other units is effective upon permit issuance, and will expire 10 years after permit issuance.

Attachment 2 of this document is the CUD Request, submitted by Potlatch and dated December 3, 2003. The CUD request includes the results of the search for BACT determinations in the past five years, as well as the BACT average determined from the search results. The proposed permit limits are lower than or the same as the BACT averages.

A summary of the Clean Units basis for determination and required monitoring is given below; further information can be found in Attachment 2 and in the permit:

Clean Unit/Control Equipment	Pollutants	Basis	Monitoring	Comments
GP 001 Line 1 Dryers/WESP & RTO	PM, PM ₁₀ , VOC, CO	Heat input total of 140 mmBtu/hr; 262,800 ODT/yr total for GP 001	Monitoring ESP (quench water flow rate, # of fields on- line); monitoring RTO (continuous monitoring of combustion chamber temperature); monitoring of production	Re-qualifying; original BACT determination 3/95, but lost due to production increase, changes made, i.e. addition of burners, as part of this modification
GP 002 Line 2 Dryers/WESP & RTO	PM, PM ₁₀ , VOC, CO	Heat input total of 135 mmBtu/hr; 262,800 ODT/yr total for GP 002	Monitoring ESP (quench water flow rate, # of fields on- line); monitoring RTO (continuous monitoring of combustion chamber temperature); monitoring of production	Qualifying as comparable-to- BACT; original BACT analysis for Line 2 dryers in 5/89
Line 1 Wood Handling Systems/Baghouse s	PM, PM ₁₀	Flowrates (dscfm): EU 036 < 38,000 EU 062 < 35,000 EU 050 < 33,000 EU 051 < 55,000 EU 094 < 6,000 EU 090 < 12,000	Visible emission monitoring or pressure drop monitoring.	Existing Clean Units under 3/95 permit. Re- qualifying as comparable-to- BACT so that CUD status effective through 10 years from permit issuance
Line 2 Wood Handling Systems/Baghouse s	PM, PM ₁₀	Flowrates (dscfm): EU 040 < 5,000 EU 053 < 35,000	Visible emission monitoring and pressure drop monitoring.	Qualifying as comparable-to- BACT; original BACT analysis for Line 2 baghouse systems in 5/89

*Clean Unit Designation
Other Related Title I Limits*

The permit references Clean Unit Title I Related Limits and Operating Parameters that formed the basis for the Comparable to BACT determination. These limits and parameters are identified in the table below.

Clean Unit/Control Equipment	Title I Related Emission Limits	Clean Unit Designation Parameters	Title I Related Monitoring, Recordkeeping and Reporting Requirements
GP001, Line 1, Dryers/WESP and RTO	PM: 12 lb/hr, 1.13 lb/ton PM ₁₀ : 12 lb/hr, 1.13 lb/ton VOCs: 0.60 lb/ton CO: 15 lb/hr, 0.49 lb/ton	Heat Input Total: 140 MMBtu/hr Max. Annual Throughput: 262,800 ODT/yr	Requirement to Calculate and Record Production Rate. Requirement to Maintain RTO Combustion Chamber temperature greater than or equal to 1586 degrees F as a three-hour average as specified in the permit. (The minimum temperature can be revised based on performance testing.) Requirement to maintain greater than or equal to 2 WESP fields on-line. (The minimum number of fields and be revised based on performance testing.) Requirements to conduct performance testing in accordance with the schedule outlined in the permit or amended permit. Requirement to operate and maintain control equipment. Requirement to maintain hard copy readout or electronic file of RTO temperatures.
GP002, Line 2, Dryers/WESP and RTO	PM: 12 lb/hr, 0.86 lb/ton PM ₁₀ : 12 lb/hr, 0.77 lb/ton VOCs: 0.44 lb/ton CO: 15 lb/hr, 1.8 lb/ton	Heat Input Total: 135 MMBtu/hr Max. Annual Throughput: 262,800 ODT/yr	Requirement to Calculate and Record Production Rate. Requirement to Maintain RTO Combustion Chamber temperature greater than or equal to 1525 degrees F as a three-hour average as specified in the permit. (The minimum temperature can be revised based on performance testing.) Requirement to maintain greater than or equal to 2 WESP fields on-line. (The minimum number of fields and be revised based on performance testing.) Requirements to conduct performance testing in accordance with the schedule outlined in the permit or amended permit. Requirement to operate and maintain control equipment. Requirement to maintain hard copy readout or electronic file of RTO temperatures.

Clean Unit/Control Equipment	Title I Related Emission Limits	Clean Unit Designation Parameters	Title I Related Monitoring, Recordkeeping and Reporting Requirements
Line 1 Wood Handling Systems/ Baghouses	EU036 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 1.3 lb/hr EU050 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 1.1 lb/hr EU051 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 1.9 lb/hr EU062 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 1.2 lb/hr EU090 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 0.41 lb/hr EU094 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 0.21 lb/hr	Flowrates (dscfm): EU036: <38,000 EU050: <33,000 EU051: <51,000 EU062: <35,000 EU090: <12,000 EU094: <6,000	The requirement to monitor and record visible emission inspection or pressure drop. Complete performance testing in accordance with the schedule contained in the permit or amended permit. Requirement to operate and maintain control equipment.
Line 2 Wood Handling Systems/ Baghouses	EU40 - PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 0.017 lb/hr EU053 –PM, PM ₁₀ : 0.004 gr/dscf PM ₁₀ : 1.2 lb/hr	Flowrates (dscfm): EU040: <5,000 EU053: , 35,000	The requirement to monitor and record visible emission inspection or pressure drop. Complete performance testing in accordance with the schedule contained in the permit or amended permit. Requirement to operate and maintain control equipment.
Total Facility			The requirements related to maintain parameters used in modeling. These requirements apply to all Clean Units.

3.1.3 Modeling

Potlatch has performed air dispersion modeling for the Facility in conjunction with previous permitting activities. The modifications proposed by Potlatch as included in this permit action will result in increased throughputs at the Facility. This requires that Potlatch update the previous modeling to reflect the proposed emission rates. In addition, Potlatch is requesting CUD for several emission units; this also requires that Potlatch evaluate ambient impacts by performing air dispersion modeling.

The dispersion modeling was conducted using AERMOD-PRIME. EPA approved the use of this alternative model which was used to compare modeled impacts to ambient air quality standards for NO_x,

CO and PM₁₀. The modeling analysis is divided into National Ambient Air Quality Standard (NAAQS) and PSD Increment Analyses.

A summary of the NAAQS and Minnesota Ambient Air Quality Standards (MAAQS) modeling results for NO_x, CO, and PM₁₀ are given below:

Pollutant	Ave. Period	Maximum Predicted Impacts (µg/m ³)		National Ambient Air Quality Standard		Minnesota Ambient Air Quality Standard	
		Conc. w/o bkgd	Conc. w/bkgd	Primary Standard (µg/m ³)	Secondary Standard (µg/m ³)	Primary Standard (µg/m ³)	Secondary Standard (µg/m ³)
NO _x	Annual	6.8	26	100	100	100	100
CO	8-Hour	190	2900	10,000 ^a	--	10,000 ^a	10,000 ^a
	1-Hour	350	5000	40,000 ^a	--	35,000 ^a	35,000 ^a
PM ₁₀	Annual	4.8	21	50	50	--	--
	24-Hour	40	65	150 ^a	150 ^a	--	--

^a Not to be exceeded more than once per year; therefore, the maximum second-highest results are shown.

A summary of the increment consumption results for PM₁₀ and NO_x is given below:

Pollutant	Avg. Period	Maximum Modeled Impact (µg/m ³)	PSD Class II Increment (µg/m ³)
NO _x	Annual	6.8	25
PM ₁₀	Annual	4.8	17
	24-hour	25	30 ^a

^a Not to be exceeded more than once per year; therefore, the maximum second-highest results are shown.

As a result of the modeling, it was determined that none of the applicable ambient air quality standards would be violated and that none of the applicable increments established by the PSD rule would be violated.

3.1.4 Emission Limits and BACT Limits

Potlatch is proposing emission limits for the Line 1 and 2 dryers and presses that are in many cases lower than the existing BACT limits. These proposed lower emission rates are contained in the permit on a lb/hr basis, and were used in modeling for those pollutants for which modeling was required. Because these proposed emission limits are protective of the NAAQS (as shown by the modeling) and are the same as or better than the existing BACT limits, and additional BACT analysis was not needed since the applicability determined that the modification was below the PSD significance thresholds, the limits were accepted without further review. The existing BACT limits are retained in the permit, and the units are expressed in a production basis (e.g. lb/ODT or lb/mmBtu). The Emission Rate Review prepared by Potlatch is provided as Attachment 1 to this document. The Review provides explanation for emission calculations performed by Potlatch and reflects the limits placed in the permit. The EC forms prepared by the Permittee are included as an attachment also and provide further information on the emission calculations.

Previous permitting and testing for this facility has evaluated VOCs on an as-carbon mass basis. Recently, EPA has indicated that VOCs should be measured in a manner that reflects the actual mass of VOCs being emitted, and that the total VOC mass should be considered when determining permit and amendment applicability. Potlatch has adjusted the 'actual' VOC numbers in the applicability determination to reflect the methodology used in AP-42 for calculating VOCs. The Annual Report required in the permit to verify their applicability analysis (see above, 3.1.1). Performance testing for VOCs will be done to measure VOCs as C (to compare to permit limits) and as VOC (as described in AP-42). The VOC numbers "as VOC" will be used in calculations in the Annual Report.

The VOC emission limits in the permit remain as VOC as carbon. The limits in the previous permits were established on this basis, and comparison of the permitted limits to BACT limits in the BACT/LAER clearinghouse are believed also to have been on an as-C basis. Upon reissuance of the Title V permit, the VOC limits will be adjusted using the site-specific data to change the limits on an as-VOC basis. There is not enough site-specific data at this time to allow for an accurate conversion.

3.2 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
GP 001: Line 1 Dryers	PM, PM ₁₀ : ≤ 1.13 lb/ODT (BACT limit) PM: ≤ 12 lb/hr (Minn. Stat. 116.07, subd. 4a) PM ₁₀ ≤ 12 lb/hr (limit set due to modeling) Opacity: ≤ 20 % with exception (Minn. R. 7011.0610) VOC: ≤ 0.60 lb/ODT (BACT limit); ≤ 18 lb/hr (Minn. Stat. 116.07, subd. 4a)	Temperature monitoring (RTO), monitoring of # of fields on-line and for presence of quench water flow (WESP), recordkeeping, O & M, inspections Re-occurring performance testing Recordkeeping for production rate, to show compliance with basis of	WESP/RTO is control primarily for PM, PM ₁₀ , VOCs, but also CO. Line 1 dryers are designated as Clean Units See 3.1.1 for discussion on frequency of performance testing Requirements for inspections have been changed from boilerplate requirements. Internal inspections of control equipment for this system can be done on an annual basis rather than quarterly. The system would need to be shut down for many days for each inspection, since the RTO

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	<p>CO: ≤ 15 lb/hr (modeling); ≤ 0.49 lb/ODT (BACT)</p> <p>NO_x: ≤ 51 lb/hr (modeling); ≤ 1.88 lb/ODT (BACT)</p> <p>Temperature limit ≥ 1586 °F at the combustion chamber</p> <p># of fields on line ≥ 2 (for WESP)</p> <p>Control efficiency $\geq 90\%$ for VOC, $\geq 95\%$ for PM, PM₁₀</p> <p>Fuel usage requirements</p>	<p>determination for CUD</p> <p>Recordkeeping for fuel usage</p>	<p>needs time to cool down to allow for internal inspection. This leads to many days of lost production. In addition, there is continuous monitoring of the control equipment to ensure good operation, so annual internal inspection should be sufficient.</p> <p>Specific testing to verify control efficiency is not needed. Although control efficiencies are to be included in permits, the efficiency condition is enforceable as a practical matter as long as the operating parameters and assumptions depended upon to determine that the control equipment would have a given efficiency are included in the permit. The monitoring and O&M requirements for the control equipment serve this purpose.</p>
GP 002: Line 2 Rotary Dryers	<p>PM: ≤ 0.86 lb/ODT (BACT limit)</p> <p>PM: ≤ 12 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>PM₁₀: ≤ 0.77 lb/ODT (BACT limit)</p> <p>PM₁₀ ≤ 12 lb/hr (limit set due to modeling)</p> <p>Opacity: ≤ 20 % with exception (Minn. R. 7011.0610)</p> <p>VOC: ≤ 0.44 lb/ODT (BACT limit); ≤ 13 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>CO: ≤ 15 lb/hr (modeling); ≤ 1.8 lb/ODT (BACT)</p> <p>NO_x: ≤ 54 lb/hr (modeling); ≤ 0.40 lb/mmBtu (BACT)</p> <p>Operating requirements prior to RTO startup:</p>	<p>Temperature monitoring of dryers prior to startup of RTO, temperature monitoring (RTO), monitoring of # of fields on-line and for presence of quench water flow (WESP), recordkeeping, O & M, inspections</p> <p>Re-occurring performance testing</p> <p>Recordkeeping for production rate, to show compliance with basis of determination for CUD</p> <p>Recordkeeping for fuel usage</p>	<p>Current dryer inlet temperature limit set as BACT (lower temperature for drying results in lower VOC emissions)</p> <p>RTO Temperature set at 1525 °F; testing will be done soon after startup to verify control.</p> <p>WESP/RTO is control primarily for PM, PM₁₀, VOCs, but also CO.</p> <p>Line 2 dryers are designated as Clean Units</p> <p>See 3.1.1 for discussion on frequency of performance testing</p> <p>Requirements for inspections have been changed from boilerplate requirements. Internal inspections of control equipment for this system can be done on an annual basis rather than quarterly. The system would need to be shut down for many days for each inspection, since the RTO needs time to cool down to allow for internal inspection. This leads to many days of lost production. In addition, there is continuous monitoring of the control equipment to ensure good operation, so annual internal inspection should be sufficient.</p>

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	Temperature limit \leq 860 °F; Production limit \leq 45,000 lb/hr RTO temperature limit \geq 1525 °F at the combustion chamber (effective after startup of RTO) # of fields on line \geq 2 (for WESP) Control efficiency \geq 90% for VOC, \geq 93% for PM, PM ₁₀ Fuel usage requirements		Specific testing to verify control efficiency is not needed. Although control efficiencies are to be included in permits, the efficiency condition is enforceable as a practical matter as long as the operating parameters and assumptions depended upon to determine that the control equipment would have a given efficiency are included in the permit. The monitoring and O&M requirements for the control equipment serve this purpose.
GP 003: Keeler Back-up Boilers	PM, PM ₁₀ : \leq 0.085 lb/MMBtu (BACT limit) Opacity: \leq 20 % with exception (Minn. R. 7011.0515) VOC: \leq 0.30 lb/MMbtu (BACT limit) CO: \leq 1.1 lb/Mmbtu (BACT limit) NO _x : \leq 0.40 lb/Mmbtu (BACT limit) Steam Flow < 36,000,000 lb/hr, 365-day rolling sum (BACT limit) Control efficiency \geq 95% for PM, PM ₁₀ Fuel usage requirements EFB Parameters: EFB Bed Voltage: \geq 3.0 kV EFB Ionizer Voltage: \geq 18.0 kV	EFB monitoring, recordkeeping, O & M, inspections Re-occurring performance testing Recordkeeping for steam production rate, fuel usage	Testing once during life of permit was deemed sufficient, since the boilers are back-up boilers. In addition, since the boilers are not constantly used, the internal inspections of the control equipment can be done on an annual basis rather than a quarterly basis as would normally be required. Specific testing to verify control efficiency is not needed. Although control efficiencies are to be included in permits, the efficiency condition is enforceable as a practical matter as long as the operating parameters and assumptions depended upon to determine that the control equipment would have a given efficiency are included in the permit. The monitoring and O&M requirements for the control equipment serve this purpose.

<p>Wood Handling Units Controlled by Baghouses</p>	<p>PM, PM₁₀: ≤ 0.0040 gr/dscf (BACT limit)</p> <p>PM₁₀ (modeling limit): EU 036: ≤ 1.3 lb/hr, EU 040: ≤ 0.17 lb/hr, EU 050: ≤ 1.1 lb/hr, EU 051: ≤ 1.9 lb/hr, EU 053: ≤ 1.2 lb/hr, EU 062: ≤ 1.2 lb/hr, EU 090: ≤ 0.41 lb/hr, EU 040: ≤ 0.21 lb/hr,</p> <p>Opacity: ≤ 20 % (Minn. R. 7011.0715)</p> <p>Control efficiency ≥ 99% for PM, PM₁₀</p>	<p>Check of visible emissions or differential pressure on a daily basis; performance testing</p>	<p>These wood handling emission units (controlled by baghouses) are designated as Clean Units; the basis for designation as Clean Units is the operation of the baghouse, and the air flowrate through the baghouse.</p> <p>Each baghouse is tested for PM, PM₁₀, opacity once during the life of the permit; the time from permit issuance varies to stagger the testing requirements.</p>
<p>EU 109 Fire Pump EU 110 Emergency Generator</p>	<p>SO₂: ≤ 0.5 lb/mmBtu</p> <p>Opacity: ≤ 20 % (Minn. R. 7011.2300)</p> <p>Fuels allowed: distillate fuel oil only</p>	<p>PTE of emission units is less than emission limits by design</p>	<p>No periodic monitoring is needed for these emission units, since the likelihood of the limits not being met is very low. EPA allows the use of 500 operating hours in calculating the annual PTE for emergency-use equipment; the PTE for these units is then small.</p>
<p>EU 128 Power Boiler</p>	<p>PM, PM₁₀: ≤ 0.030 lb/MMBtu (BACT limit)</p> <p>Opacity: ≤ 20 % with exception (NSPS Subp. Db)</p> <p>VOC: ≤ 0.10 lb/MMbtu (BACT limit)</p> <p>CO: ≤ 0.20 lb/MMbtu (BACT limit)</p> <p>NO_x: ≤ 0.20 lb/MMbtu (BACT limit)</p> <p>Control efficiency ≥ 95% for PM, PM₁₀ (note: due to use of CEMS for NO_x, it is not necessary to include SNCR control efficiency in permit)</p> <p># of fields on line ≥ 2 (for ESP);</p> <p>Parameters for SNCR:</p>	<p>ESP, SNCR monitoring, recordkeeping, O & M, inspections</p> <p>Use of COMS, CEMS for NO_x</p> <p>Performance testing</p> <p>Recordkeeping for fuel usage</p>	<p>Performance testing is required within two years of permit issuance; future testing frequency will be determined after the initial performance test.</p> <p>Specific parameters for the SNCR are not included, other than to verify that the system is operational. The operation of the SNCR is tied into the NO_x CEMS, i.e. urea is injected into the system to control NO_x to ensure that the NO_x limit as measured by the CEMS is being met.</p> <p>Specific testing to verify control efficiency is not needed. Although control efficiencies are to be included in permits, the efficiency condition is enforceable as a practical matter as long as the operating parameters and assumptions depended upon to determine that the control equipment would have a given efficiency are included in the permit. The monitoring and O&M requirements for the control equipment serve this purpose.</p> <p>Requirements for inspections have been</p>

	<p>Verify that urea metering system is energized and that the circulation pump is operating</p> <p>Fuel usage requirements</p>		<p>changed from boilerplate requirements. Internal inspections of control equipment for this system can be done on an annual basis rather than quarterly. Use of COMS and NO_x CEMS ensures good operation of the control equipment, so annual internal inspection should be sufficient.</p>
<p>EU 129</p> <p>Line 1 Press</p>	<p>PM, PM₁₀: ≤ 0.51 lb/ODT (BACT limit)</p> <p>PM: ≤ 15 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>PM₁₀ ≤ 15 lb/hr (limit set due to modeling)</p> <p>Opacity: ≤ 20 % (Minn. R. 7011.0715)</p> <p>VOC: ≤ 0.15 lb/ODT (BACT limit); ≤ 15 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>CO: ≤ 4.5 lb/hr (modeling); ≤ 0.15 lb/ODT (BACT)</p>	<p>Re-occurring performance testing</p>	<p>See 3.1.1 for discussion on frequency of performance testing</p>
<p>EU 130</p> <p>Line 2 Press</p>	<p>PM, PM₁₀: ≤ 0.34 lb/ODT (BACT limit)</p> <p>PM: ≤ 10 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>PM₁₀ ≤ 10 lb/hr (limit set due to modeling)</p> <p>Opacity: ≤ 20 % (Minn. R. 7011.0715)</p> <p>VOC: ≤ 0.61 lb/ODT (BACT limit); ≤ 15 lb/hr (Minn. Stat. 116.07, subd. 4a)</p> <p>CO: ≤ 4.5 lb/hr (modeling); ≤ 0.15 lb/ODT (BACT)</p>	<p>Re-occurring performance testing</p>	<p>See 3.1.1 for discussion on frequency of performance testing</p>

3.3 Insignificant Activities

The Facility has several operations which are classified as insignificant activities. These are listed in Appendix B to the permit.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. 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.

Appendix B is a listing of the Facility's Insignificant Activities and their applicable requirements. This is a fairly standard way to include these in the permit, since it is highly unlikely the MPCA would need to have these as trackable items in Delta.

Another area where the permit deviates from guidance is in the use of groups for requirements that apply to individual pieces of equipment. This is done in order to streamline the permit.

Note: There is no Table C as part of this permit.

3.5 Changes from Previous Permits

The facility's production limits have been removed. The facility is increasing its capacity, and has evaluated the potential emissions at the maximum capacity; therefore, it is not necessary to impose a production limit on the facility. In addition, the restriction on the amount of pine that could be processed has been removed. Previous permits had formaldehyde limits on the Line 2 dryers and press. These have been removed; ambient monitoring for formaldehyde performed after the permit issuance in 1989 showed that formaldehyde ambient levels were within acceptable limits. Since that time, formaldehyde emissions have decreased with the addition of the RTO on the Line 1 dryers, and will be further reduced with the addition of the RTO on the Line 2 dryers.

In addition, the restrictions on the amount of pine that could be used have not been carried forward to this permit. VOC emissions from the OSB pressing process are dependent on the amount of wood processed and type of resin used to adhere the wafers. Wood species has an insignificant impact on VOC press emissions, as the species-dependent VOCs are driven off in the OSB drying process. The dryers on both lines will be using thermal oxidizers to control the VOC emissions, so additional VOCs that may be generated from use of different wood species will be abated.

3.6 Comments Received during Public Comment Period, Public Meeting; EPA Review

Comment letters were received during the public comment period. In addition, the MPCA held a public information meeting in Bemidji on February 17, 2004. The purpose of the meeting was to provide information to the public regarding the proposed Title V permit. The MPCA provided a presentation during the meeting which provided information about the facility, the Permittee's proposed modification, and the proposed permit. Approximately 50 people were in attendance at the meeting, many of whom were in support of the proposed project. Questions were raised and answered during the meeting, and written comments were provided to the MPCA at the end of the meeting.

Several comment letters were received from the public during the public notice period. A summary of the comments with the MPCA responses, as well as copies of the relevant letters, are attached to this document. No changes were made to the permit as a result of these comments.

The Permittee also provided written comments during the public comment period. The MPCA responses, as well as the Permittee's comments are provided as attachments to this document. Changes made to the permit are described in the MPCA responses.

The revised permit was sent to EPA for their 45-day review on April 26, 2004. Comments were not received from EPA during their review period. No changes were made to the permit.

4. Conclusion

Based on the information provided by Potlatch Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05700005-001 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: Paula Connell, P.E. (permit writer/engineer)
Dave Beil (peer review, NSR Reform)
Dick Cordes (peer review, NSR Reform)
Cary Hernandez (enforcement)
Sarah Kilgriff (stack testing)

Attachments: 1. Emission Rate Review
 2. Clean Unit Designation Request (Dated 12/3/03)
 3. Permittee Calculation Spreadsheets and PTE Summary
 4. Facility Description and CD-01 Forms