

AIR EMISSION PERMIT NO. 05700005-005

IS ISSUED TO

Ainsworth Engineered (USA) L.L.C.

AINSWORTH ENGINEERED (USA) L.L.C. - BEMIDJI

29647 U.S. Highway 2 East
Bemidji, Hubbard 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	Issuance Date	Action Number
Total Facility Operating Permit	04/1995; 01/30/2004	6/17/2004	001
Administrative Amendment	09/29/2004	11/18/2004	002
Administrative Amendment	06/10/2005	08/03/2005	003
Major Amendment	12/15/2005	06/21/2006	004
Major Amendment; includes minor and administrative amendment	01/24/2007	See Below	005

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

Permit Type: Federal; Part 70/Major for New Source Review

Issue Date: February 29, 2008

Expiration: June 17, 2009
Title I Conditions do not expire.

Jeff J. Smith, Manager
Air Quality Permits Section
Industrial Division

for Brad Moore
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

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

FACILITY DESCRIPTION:

Ainsworth Engineered (USA) L.L.C. (Ainsworth or Permittee) owns and operates an Oriented Strandboard (OSB) manufacturing facility (Facility) in Hubbard County, Minnesota. The Facility is located approximately 10 miles southeast of Bemidji, Minnesota on U.S. Highway 2.

Logs are debarked and reduced to small strands, which are then dried, blended with a resin and wax mixture, formed into layers, and then pressed into wood panels. The OSB manufacturing line consists of three wood-strand triple pass green rotary dryers and one board press. The dryers and press are heated by a wood-fired thermal oil heater (Wellons Heat Source EU 108). The hot exhaust from the heater is passed by oil-filled tubes and the heated oil is used to heat the press and then the hot exhaust is routed to the dryers for drying wood wafers.

Line 2 dryers (including the wood-fired heater emissions) are controlled by wet electrostatic precipitators and a thermal oxidizer. Line 2 press emissions (primarily VOCs, phenol, and formaldehyde) are currently uncontrolled but will be controlled by September 2008 by thermal oxidizer. Various handling, finishing, and forming processes are also part of Line 2. The Facility also has a wood-fired cogeneration boiler but it is not operated at this time.

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.

ACTION 002

This was an administrative amendment for a change in ownership.

ACTION 003

This amendment granted a 120-day extension to testing required for the GP 002 Line 2 Rotary Drying System.

ACTION 004

This permit action increased the carbon monoxide limit for the emissions from the GP 002 Line 2 Rotary Dryers, add the requirements of 40 CFR part 63, subpart DDDDD for the facility boilers, restricted permitted fuel for the two Keeler boilers to natural gas only, and added a limit for natural gas combustion by EU 108 when emissions are routed through the bypass stack SV 017.

ACTION 005

This permit action is a major amendment to the existing part 70 operating permit. This amendment authorizes combustion of manufacturing residue in the Line 2 Wellons Heat Source (EU 108) at up to 1 percent by weight of total fuel input. This permit action also memorializes the shutdown of Line 1 dryers (1, 2, 3, and 4), as well as Line 1 press, re-assignment of the Line 1 dryers thermal oxidizer (CE 045) to the Line 2 press exhaust to meet the Plywood and Composite Wood Products (PCWP) Maximum Achievable Control Technology (MACT) standard, and removal of three secondary cyclones from Line 2 (CE 023, CE 024, and CE 025) due to installation of higher efficiency upstream primary cyclones (there is a primary cyclone process unit that is part of each line 2 dryer). In addition this action includes a minor amendment application for installation of a 51 mmBtu/hr package boiler in 2006 according to Minn. R. 7007.1450, and revised stack parameters (permit Appendix C) based on October 2006 and August 2007 dispersion modeling.

This amendment also incorporates a Line 2 Press softwood limit and revision to the Line 2 Dryers oxidizer temperature limit based on November 2006 stack test results. In addition, the PCWP MACT standard requirements are incorporated into the permit as well as the Line 2 Press extended compliance date of October 1, 2008. This date was extended in response to a June 2007 District of Columbia Court of Appeals decision vacating the extended October 1, 2008 compliance date promulgated by the U.S. Environmental Protection Agency in 2006. Finally, the requirements of part 63, subpart DDDDD 'Boiler MACT' have been removed from the permit due to vacatur of the rule by the D.C. Circuit Court of Appeals effective July 30, 2007.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji
 Permit Number: 05700005 - 005

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
<p>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.</p> <p>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.</p>	Minn. R. 7007.0800, subp. 2
<p>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.</p>	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
<p>Line 1 Dryers and Line 1 Press Operation: The Permittee is prohibited from operating Line 1 Dryers (described as EU 009, EU 010, EU 011, and EU 012 in prior permits) and Line 1 Press (EU 129 in prior permits). Line 1 Dryers and Line 1 Press shall be made permanently inoperable through the physical removal of feed conveyors to the dryers and press or other similar equipment removal.</p>	Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2
<p>Part 63 Subpart DDDD Plywood and Composite Wood Products MACT Standard Requirements: For process units not subject to the compliance options or work practice requirements specified in Section 63.2240 (including but not limited to, lumber kilns), the Permittee is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in Section 63.9(b).</p>	40 CFR Section 63.2252
<p>DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NEW SOURCE REVIEW</p>	hdr
<p>These requirements apply where there is a reasonable possibility that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test (either by itself or as part of the hybrid test described in Section 52.21(a)(2)(iv)(f)) and found to not be part of a major modification, may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project.</p> <p>Even though a particular modification is not subject to New Source Review, a permit amendment, recordkeeping, or notification may still be required under Minn. R. 7007.1150 - 7007.1500.</p>	Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following:</p> <ol style="list-style-type: none"> 1. Project description 2. Identification of any emission unit (EU) whose emissions of an NSR pollutant could be affected 3. Pre-change potential emissions of any affected existing EU, and the projected post-change potential emissions of any affected existing or new EU. 4. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the EU could have accommodated during the baseline period, an explanation of why the amounts were excluded, and any creditable contemporaneous increases and decreases that were considered in the determination. <p>The Permittee shall maintain records of this documentation.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>The Permittee shall monitor the actual emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using the ATPA test, and the potential emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using potential emissions in the hybrid test. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if the hybrid test was used in the analysis) emissions of the regulated pollutant, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit of any unit associated with the project.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>The Permittee must submit a report to the Agency if the annual summed (actual, plus potential if used in hybrid test) emissions differ from the preconstruction projection and exceed the baseline actual emissions by a significant amount as listed at 40 CFR Section 52.21(b)(23). Such report shall be submitted to the Agency within 60 days after the end of the year in which the exceedances occur. The report shall contain:</p> <ol style="list-style-type: none"> a. The name and ID number of the facility, and the name and telephone number of the facility contact person b. The annual emissions (actual, plus potential if any part of the project was analyzed using the hybrid test) for each pollutant for which the preconstruction projection and significant emissions increase are exceeded. c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection. 	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>OPERATIONAL REQUIREMENTS</p>	<p>hdr</p>
<p>The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.</p>	<p>40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L, & 7M; Minn. R. 7007.0800, subps. 1, 2, & 4; Minn. R. 7009.0010-7009.0080</p>
<p>Proper Operation and Maintenance: At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain any emission unit subject to a MACT standard and its associated air pollution control and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.</p>	<p>40 CFR Section 63.6(e)(1)(i); Minn. R. 7011.7000</p>
<p>Malfunctions shall be corrected as soon as practicable after their occurrence for any emission unit subject to a MACT standard.</p>	<p>40 CFR Section 63.6(e)(l)(ii); Minn. R. 7011.7000</p>
<p>The Permittee shall prepare and implement a Startup, Shutdown, and Malfunction Plan (SSMP) for each emissions unit subject to Maximum Control Technology Standards. The SSMP shall be prepared and implemented by October 1, 2007 for all emission units subject to part 63 subpart DDDD except for EU 130. An SSMP shall be prepared and implemented for EU 130 by October 1, 2008.</p> <p>The SSMP including associated control and monitoring equipment shall be prepared in accordance with 40 CFR Section 63.6(e)(3) and include requirements specified therein. The SSMP must be located at the plant site and must be kept updated. When the SSMP is updated, the Permittee must keep all previous versions of the SSMP for a period of 5 years. The Permittee must submit the SSMP when required.</p>	<p>40 CFR Section 63.6(e)(3)(i); 40 CFR Section 63.6(e)(3)(v); Minn. R. 7011.7000</p>
<p>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.</p>	<p>Minn. R. 7011.0020</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji
 Permit Number: 05700005 - 005

<p>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.</p> <p>The O & M plan shall specify the pressure drop range of each fabric filter baghouse.</p>	<p>Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)</p>
<p>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.</p>	<p>Minn. R. 7019.1000, subp. 4</p>
<p>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.</p>	<p>Minn. R. 7011.0150</p>
<p>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.</p>	<p>Minn. R. 7030.0010 - 7030.0080</p>
<p>Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).</p>	<p>Minn. R. 7007.0800, subp. 9(A)</p>
<p>The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.</p>	<p>Minn. R. 7007.0800, subp. 16</p>
<p>PERFORMANCE TESTING</p>	<p>hdr</p>
<p>Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A or B.</p>	<p>Minn. R. ch. 7017</p>
<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p> <p>Unless otherwise noted, the Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018. Note: Sources subject to Part 63 have different notification and reporting deadlines.</p>	<p>Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2</p>
<p>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.</p>	<p>Minn. R. 7017.2025</p>
<p>MONITORING REQUIREMENTS</p>	<p>hdr</p>
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, 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>Recordkeeping: 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>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<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>Recordkeeping: The Permittee shall maintain files of all information required by this part in a form suitable and readily available for expeditious inspection and review. The files should be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Only the most recent two years of information must be kept on site.</p>	<p>40 CFR Section 63.10(b)(1); Minn. R. 7019.0100, subp. 2(B)</p>
<p>The Permittee shall maintain, at a minimum, the following information in the files required by Section 63.10(b)(1): 1) The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; 2) the occurrence and duration of each malfunction of the air pollution control equipment; 3) all maintenance performed on the pollution control equipment; 4a) Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's SSMP;</p> <p>(continued)</p>	<p>40 CFR Section 63.10(b)(2); Minn. R. 7019.0100, subp. 2(B)</p>
<p>4b) Actions taken during periods of malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; 5) all information necessary to demonstrate conformance with the affected source's SSMP and actions taken in accordance with SSMP; 6) each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative; 7) all required measurements needed to demonstrate compliance with a relevant standard;</p> <p>(continued)</p>	<p>40 CFR Section 63.10(b)(2); Minn. R. 7019.0100, subp. 2(B)</p>
<p>(continued from above)</p> <p>8) all results of performance test, CMS performance evaluations, and opacity and visible emission observations; 9) all measurements as may be necessary to determine the conditions of performance tests and performance evaluations; 10) all CMS calibration checks; 11) all adjustments and maintenance performed on CMS; 12) any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements under this part; 13) all documents supporting initial notifications and notifications of compliance status.</p>	<p>40 CFR Section 63.10(b)(2); Minn. R. 7019.0100, subp. 2(B)</p>
<p>REPORTING/SUBMITTALS</p>	<p>hdr</p>
<p>If actions taken during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards) or malfunction of an affected source are consistent with the procedures specified in the SSMP, then the Permittee shall state such information in a startup, shutdown, and malfunction report. Actions taken to minimize emissions during such startups, shutdowns and malfunctions shall be summarized in the report. Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission standards, or if a malfunction occurred during the reporting period. Such reports shall be delivered or postmarked by the 30th day following the end of each calendar half year.</p>	<p>40 CFR Section 63.10(d)(5)(i); Minn. R. 7019.0100, subp. 2(B)</p>
<p>If an action taken by the Permittee during a startup or shutdown that caused the source to exceed any applicable emission limitation in the relevant emission standards, or during a malfunction is not consistent with the procedures specified in the SSMP, then the Permittee shall report the actions taken for that event with an immediate report within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event. The immediate report, within 2 days, shall consist of a telephone call or fax and shall report the actions taken for the event. The letter, to be submitted within 7 days, must contain name, title, and signature of a responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following SSMP, describing all excess emissions and/or parameter monitoring exceedances which are believed to have occurred, and actions taken to minimize emissions.</p>	<p>40 CFR Section 63.6(e)(3)(iv) & Minn. R. 7011.7000; 40 CFR Section 63.10(d)(5)(ii) and Minn. R. 7019.0100, subp. 2(B)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<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>Prior to construction or reconstruction of an "affected source" under the promulgated MACT standards, the Permittee must apply for and obtain an air emission permit.</p>	<p>40 CFR Section 63.5(b)(3); Minn. R. 7011.7000</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 on or before April 1 of each calendar year following permit issuance. Submit the report 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

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: GP 002 Line 2 Rotary Dryers #5, #6, & #7

- Associated Items:**
- CE 046 Wet Electrostatic Precipitator
 - CE 047 Wet Electrostatic Precipitator
 - CE 048 Wet Electrostatic Precipitator
 - CE 049 Thermal Oxidizer
 - EU 019 Green Rotary Dryer #5
 - EU 020 Green Rotary Dryer #6
 - EU 021 Green Rotary Dryer #7
 - EU 108 Wellons Heat Source
 - SV 002 Line 2 Green Rotary Dryers #5, #6, & #7
 - SV 017 Line 2 Dryer Wellons Heat Source Bypass

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
GP 002 emission units are process included in the definition of an existing affected source as defined in the Plywood and Composite Wood Products MACT Standard at Section 63.2232. The Permittee must comply with the applicable compliance options, operating requirements, and work practice requirements found in 40 CFR part 63 subpart DDDD for all GP 002 emission units no later than the compliance date of October 1, 2007.	40 CFR Sections 63.2232 and 63.2233(b)
For each rotary dryer reduce methanol emissions by 90 percent by using an emissions control system.	40 CFR 63.2240(b); part 63 subpart DDDD Table 1B Option 3
Total Particulate Matter: less than or equal to 12 lbs/hour for SV 002. 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.	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.	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 13.0 lbs/hour measured as carbon 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. VOC shall be measured as carbon 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 30.0 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.	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 54.0 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: EU 108 fuel is limited to dry or green wood fuel, dry or green wood waste, propane, and natural gas. Also up to one percent by weight (on a calendar month basis) of the total fuel combusted may consist of manufacturing residue when EU 128 is not combusting manufacturing residue. EU 108 is prohibited from combusting manufacturing residue when EU 128 is combusting manufacturing residue. Biomass fuels approved by the MPCA in accordance to the procedures outlined in this permit (see below) may also be used.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Manufacturing Residue: 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), corrugated cardboard unsuitable for recycling, and absorbent material containing spilled oil, anti-freeze, water-based paints, or soy or water-based ink.</p> <p>Manufacturing residue shall not contain 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. For absorbent materials containing spilled liquids other than oil, shall not contain any hazardous waste listed in Minn. R. 7045.0135 or any wastes specified in Minn. R. 7045.0131 as hazardous. Oil in any absorbent material shall only be on-specification used oil.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<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>EU 108 Natural gas usage: Less than or equal to 18,000 mmBtu per year based on a 365 day rolling sum. This limit applies only when EU 108 vents combustion emissions through SV 017 and bypasses air pollution control equipment during preheating of the thermal oil system.</p>	<p>Title I Condition: To avoid major modification classification under 40 CFR Section 52.21 and Minn. R. 7007.3000</p>
<p>General Requirements:</p> <p>(a) The Permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in part 63 subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in Section 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.</p> <p>(continued)</p>	<p>40 CFR Section 63.2250</p>
<p>General Requirements (continued):</p> <p>(b) The Permittee must always operate and maintain your affected source, including air pollution control and monitoring equipment, according to the provisions in Section 63.6(e)(1)(i).</p> <p>(c) The Permittee must develop a written SSMP according to the provisions in Section 63.6(e)(3).</p>	<p>40 CFR Section 63.2250</p>
<p>The Permittee shall follow the applicable General Provisions in Sections 63.1 through 63.13 as listed in Table 10 to part 63 subpart DDDD. A copy of Table 10 is included in Appendix F of this permit.</p>	<p>40 CFR Section 63.2290</p>
<p>CONTROL EQUIPMENT REQUIREMENTS</p>	<p>hdr</p>
<p>Temperature: greater than or equal to 1581 degrees F using 3-hour Block 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 (1581 F measured 11/15/06). For the first three hours after CE 049 startup, the continuous average chamber temperature shall be used instead of the 3-hour block average. If the three-hour block average temperature or the startup chamber temperature drops below the minimum temperature limit, this shall be reported as a deviation.</p>	<p>Title I Condition: 40 CFR Section 52.21 BACT operating requirement and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14; meets requirements of 40 CFR 63.2240(b) & part 63 subpart DDDD Table 2 Option 1</p>
<p>The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency (as measured from thermal oxidizer inlet to thermal oxidizer outlet) for Volatile Organic Compounds: greater than or equal to 90.0 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21 and Minn. R. 7007.3000; 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 thermal oxidizer inlet to thermal oxidizer outlet) for Particulate Matter < 10 micron: greater than or equal to 95.0 percent control efficiency</p>	<p>Title I Condition: 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Number of Fields On-line for Each WESP: greater than or equal to two fields, 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. Venting process gases through control equipment when the number of on-line WESP fields drops below the required minimum shall be reported as a deviation.</p>	<p>Title I Condition: 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2</p>
<p>The Permittee shall operate and maintain the 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 precipitators and thermal oxidizer is in operation. Control equipment shall be operated and maintained according to 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>During times when the Permittee combusts only natural gas in EU 108 and is not operating the dryers (EU 019, EU 020 or EU 021), the Permittee is not required to operate the air pollution control equipment (CE 046, CE 047, CE 048, and CE 049).</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 block average temperatures for the thermal oxidizer combustion chamber.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Temperature Monitoring: For each temperature monitoring device, the Permittee shall meet the requirements in paragraphs (a) and (b)(1) through (6) of Section 63.2269.</p> <p>(a) The Permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of Section 63.2269.</p> <p>(1) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.</p> <p>(2) At all times, the Permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>(3) Record the results of each inspection, calibration, and validation check.</p> <p>(continued)</p>	<p>40 CFR Section 63.2269</p>
<p>Temperature Monitoring (cont.):</p> <p>(b) (1) Locate the temperature sensor in a position that provides a representative temperature.</p> <p>(2) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.</p> <p>(3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.</p> <p>(continued)</p>	<p>40 CFR Section 63.2269</p>
<p>Temperature Monitoring (cont.):</p> <p>(4) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, the Permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.</p> <p>(5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.</p> <p>(6) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.</p>	<p>40 CFR Section 63.2269</p>
<p>(a) Monitor and collect data according to Section 63.2270.</p> <p>(b) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, you must not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The Permittee must use all the data collected during all other periods in assessing compliance.</p> <p>(continued)</p>	<p>40 CFR Section 63.2270</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(continued from above)</p> <p>A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.</p>	<p>40 CFR Section 63.2270</p>
<p>(c) The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The Permittee must use all the data collected during all other periods in assessing the operation of the control system.</p> <p>(d) Determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (b) and (c) of Section 63.2270).</p>	<p>40 CFR Section 63.2270</p>
<p>(f) To calculate the data averages for each 3-hour or 24-hour averaging period, the Permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in paragraphs (b) and (c) of Section 63.2270).</p>	<p>40 CFR Section 63.2270</p>
<p>(a) The Permittee must demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in Sections 63.2240 and 63.2241 that apply according to the methods specified in Tables 7 and 8 to subpart DDDD.</p> <p>(b) The Permittee must report each instance in which the applicable compliance option, operating requirement, and work practice requirement in Tables 7 and 8 to subpart DDDD were not met. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (b)(1) through (3) of Section 63.2271. These instances are deviations from the compliance options, operating requirements, and work practice requirements in subpart DDDD. These deviations must be reported according to the requirements in Section 63.2281.</p>	<p>40 CFR Section 63.2271</p>
<p>(b)(1) [Reserved]</p> <p>(2) Consistent with Sections 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the EPA Administrator's satisfaction that the Permittee was operating in accordance with Section 63.6(e)(1). The EPA Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in Section 63.6(e).</p> <p>(3) Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the Permittee demonstrates to the EPA Administrator's satisfaction that the Permittee was operating in accordance with the approved routine control device maintenance exemption.</p>	<p>40 CFR Section 63.2271</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 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>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 4, 5, and 14</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Corrective Actions: if the number of fields on line are below the minimum specified by this permit, or if the wet electrostatic precipitators (WESPs) 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 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 WESPs. The Permittee shall keep a record of the type and date of any corrective action taken.</p>	<p>Minn. R. 7007.0800, subp. 4, 5, and 14</p>
<p>Routine Control Device Maintenance Exemption: The Permittee may request a routine CE 049 maintenance exemption from the EPA Administrator for routine maintenance events such as bakeouts, washouts, media replacement, and replacement of corroded parts. The request must justify the need for the routine maintenance on CE 049 and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe how the Permittee plans to make reasonable efforts to minimize emissions during the maintenance, and provide any other documentation required by the EPA Administrator.</p> <p>The routine CE 049 maintenance exemption must not exceed 3.0 percent of annual operating uptime for each GP 002 green rotary dryer.</p> <p>(continued)</p>	<p>40 CFR Section 63.2251</p>
<p>Routine Control Device Maintenance Exemption (cont.): The request for the routine control device maintenance exemption, if approved by the EPA Administrator, must be incorporated by reference in and attached to the affected source's title V permit.</p> <p>The compliance options and operating requirements do not apply during times when control device maintenance covered under the Permittee's approved routine control device maintenance exemption is performed. The Permittee must minimize emissions to the greatest extent possible during these routine control device maintenance periods.</p> <p>To the extent practical, startup, shutdown of emission control systems must be scheduled during times when process equipment is also shutdown.</p>	<p>40 CFR Section 63.2251</p>
<p>PERFORMANCE TESTING</p>	<p>hdr</p>
<p>Performance Test: due before 07/13/2011 to determine SV 002 Total Particulate Matter, Particulate Matter less than 10 microns, and Nitrogen Oxide emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before 11/15/2009 to determine SV 002 Carbon Monoxide emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before 11/15/2011 to determine SV 002 Volatile Organic Compound emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before 06/08/2010 to measure SV 002 opacity.</p>	<p>Minn. R. 7017.2020, subp. 1</p>
<p>Initial Performance Test: due 180 days after 10/01/2007 to demonstrate initial compliance for methanol removal efficiency. To demonstrate initial compliance with the compliance options and operating requirements, the Permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 of subpart DDDD according to the requirements in Section 63.2262 and Table 4 of subpart DDDD.</p>	<p>40 CFR Sections 63.2260(a) and 63.2261(a)</p>
<p>Performance Testing: conduct each performance test used to determine compliance with the applicable limit in part 63 subpart DDDD Table 1B, according to the requirements in Section 63.7(e)(1), the requirements in paragraphs (b) through (l) of Section 63.2262, and according to the applicable methods specified in Table 4 of part 63 subpart DDDD.</p>	<p>40 CFR Section 63.2262(a) and part 63 subpart DDDD Table 4 items (1) - (4), (7), (9), and (10)</p>
<p>Compliance Demonstration: Compliance has been demonstrated compliance for methanol destruction efficiency if:</p> <p>(4) Line 2 thermal oxidizer methanol emissions measured using the methods in Table 4 to subpart DDDD over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in Section 63.2262; AND the Permittee has a record of the oxidizer operating temperatures as required by Table 2 of subpart DDDD over the performance test during which emissions were reduced by at least 90 percent.</p>	<p>40 CFR Part 63 subpart DDDD table 5 item (4)</p>
<p>RECORDKEEPING</p>	<p>hdr</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>EU 108 Natural Gas Usage and Heat Input Recordkeeping: Once each day the Permittee shall calculate, record, and maintain a record of the following:</p> <ol style="list-style-type: none"> 1. EU 108 natural gas usage for the previous calendar day (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 presses during startup); 2. EU 108 total natural gas usage for the previous 365 days (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 presses during startup) to determine the 365-day rolling sum; 3. EU 108 total heat input for the previous 365-days from natural gas (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 presses during startup), by converting cubic feet of natural gas to Btu at a rate of 1020 Btu/cubic foot. 	<p>Title I Condition: To avoid major modification classification for NOx under 40 CFR Section 52.21 and Minn. R. 7007.3000</p>
<p>Daily Recordkeeping - EU 108 Fuel Combustion: On each day of operation, the Permittee shall calculate, record, and maintain records of:</p> <ol style="list-style-type: none"> 1. the total weight of all fuel combusted by EU 108 for the previous calendar day; 2. the total weight of manufacturing residue combusted by EU 108 for the previous calendar day. 	<p>Minn. R. 7007.0800, subps. 4 and 5</p>
<p>Monthly Recordkeeping - EU 108 Fuel Combustion: By the 15th day of each month, calculate and record the following for the previous calendar month:</p> <ol style="list-style-type: none"> 1. total weight of manufacturing residue combusted in EU 108 2. total weight of all fuels combusted in EU 108 (including manufacturing waste) 3. monthly average manufacturing residue combusted by EU 108 as a percentage of total fuel combusted by weight, using the following equation: <p>Percent MR = $[MRw / (MRw + Fw)] * 100$</p> <p>where:</p> <p>Percent MR = monthly average manufacturing residue combusted by EU 108 as a percentage of total fuel combusted by weight during the previous calendar month MRw = weight of manufacturing waste combusted during the previous calendar month Fw = weight of all fuel combusted during the previous calendar month</p> <p>MRw and Fw must be in the same units of weight measurement.</p>	<p>Minn. R. 7007.0800, subps. 4 and 5</p>
<p>If the 3-hour block average temperature drops below the minimum temperature limit, the VOC emitted during that time shall be considered uncontrolled until the average minimum temperature limit is once again achieved. This shall be reported as a deviation.</p>	<p>Minn. R. 7007.0800, subp. 5</p>
<p>(a) The Permittee must keep the following records:</p> <ol style="list-style-type: none"> (1) A copy of each notification and report submitted to comply with subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in Section 63.10(b)(2)(xiv). (2) The records in Section 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. (3) Documentation of approved routine control device maintenance exemption, if a request for such an exemption is made under Section 63.2251. (4) Records of performance tests and performance evaluations as required in Section 63.10(b)(2)(viii). <p>(b) The Permittee must keep the records required in Tables 7 and 8 to subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies.</p>	<p>40 CFR Section 63.2282(a) & (b)</p>
<p>(a) Records must be in a form suitable and readily available for expeditious review as specified in Section 63.10(b)(1).</p> <p>(b) As specified in Section 63.10(b)(1), the Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.</p>	<p>40 CFR Section 63.2283(a) & (b)</p>
<p>NOTIFICATIONS</p>	<p>hdr</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(a) The Permittee must submit all of the notifications in Sections 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified. (b) The Permittee must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in Section 63.9(b)(2). This has been completed. (c) For all required performance tests, the Permittee shall submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in Section 63.7(b)(1).</p>	<p>40 CFR Section 63.2280</p>
<p>(d) If the Permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 to subpart DDDD, the Permittee must submit a Notification of Compliance Status as specified in Section 63.9(h)(2)(ii). (1) For each initial compliance demonstration required in Table 5 or 6 to subpart DDDD that does not include a performance test, submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration. (2) For each initial compliance demonstration required in Tables 5 and 6 to subpart DDDD that includes a performance test conducted according to the requirements in Table 4 to subpart DDDD, submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Section 63.10(d)(2).</p>	<p>40 CFR Section 63.2280</p>
<p>(continued from above) (e) If the Permittee requests a routine control device maintenance exemption according to Section 63.2251, the Permittee must submit the request for the exemption no later than 30 days before the compliance date. (g) The Permittee must notify the EPA Administrator within 30 days before taking any of the actions specified in paragraphs (g)(1) and (3) of Section 63.2280. (1) The Permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements in subpart DDDD. (3) The Permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.</p>	<p>40 CFR Section 63.2280</p>
<p>REPORTING</p>	<p>hdr</p>
<p>(a) The Permittee must submit each applicable report in Table 9 to subpart DDDD. (b) Unless the EPA Administrator has approved a different schedule for submission of reports under Section 63.10(a), submit each report by the date in Table 9 to subpart DDDD and as specified in paragraphs (b)(1) through (5) of Section 63.2281. (1) The first compliance report must cover the period beginning on the compliance date that is specified for the Permittee's affected source in Section 63.2233 ending on June 30 or December 31, and lasting at least 6 months, but less than 12 months. For example, if the compliance date is March 1, then the first semiannual reporting period would begin on March 1 and end on December 31. (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31 for compliance periods ending on June 30 and December 31, respectively.</p>	<p>40 CFR Section 63.2281(a) and (b)</p>
<p>(b)(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively. (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of Section 63.2281.</p>	<p>40 CFR Section 63.2281(b)</p>
<p>(c) The compliance report must contain the information in paragraphs (c)(1) through (8) of Section 63.2281. (1) Company name and address. (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (3) Date of report and beginning and ending dates of the reporting period. (4) If there was a startup, shutdown, or malfunction during the reporting period and you took actions consistent with the SSMP, the compliance report must include the information specified in Section 63.10(d)(5)(i). (5) A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in paragraphs (c)(5)(i) through (iii) of Section 63.2281.</p>	<p>40 CFR Section 63.2281(c)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(c)(5)(i) The date and time when the control device was shut down and restarted. (ii) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline. (iii) A statement of whether or not the control device maintenance was included in the approved routine control device maintenance exemption developed pursuant to Section 63.2251. If the control device maintenance was included in the Permittee's approved routine control device maintenance exemption, the Permittee must report the information in paragraphs (c)(5)(iii)(A) through (C) of Section 63.2281. (A) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(5)(iii)(B) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period. (C) Based on the information recorded under paragraphs (c)(5)(iii)(A) and (B) of Section 63.2281 for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of Section 63.2281.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(5)(iii)(C) Equation 1 $RM = (DTp + DTc)/(PUp + PUC)$ Where: RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance; PUp= Process unit uptime for the previous semiannual compliance period; PUC= Process unit uptime for the current semiannual compliance period; DTp= Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period; DTc= Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(6) The results of any performance tests conducted during the semiannual reporting period. (7) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 to subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period. (8) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in Section 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(d) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to subpart DDDD that occurs at an affected source where a CMS was not used to comply with the compliance options, operating requirements, or work practice requirements in subpart DDDD, the compliance report must contain the information in paragraphs (c)(1) through (6) and in paragraphs (d)(1) and (2) of Section 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance. (1) The total operating time of each affected source during the reporting period. (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.</p>	<p>40 CFR Section 63.2281(d)</p>
<p>(e) For each deviation from a compliance option or operating requirement occurring at an affected source where a CMS is used to comply with the compliance options and operating requirements in this subpart, the Permittee must include the information in paragraphs (c)(1) through (6) and paragraphs (e)(1) through (11) of Section 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance. (1) The date and time that each malfunction started and stopped. (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks. (3) The date, time, and duration that each CMS was out-of-control, including the information in Section 63.8(c)(8).</p>	<p>40 CFR Section 63.2281(e)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-14

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(e)(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in the approved routine control device maintenance exemption; or during another period.</p> <p>(5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.</p> <p>(6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.</p> <p>(7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.</p>	40 CFR Section 63.2281(e)
<p>(e)(8) A brief description of the process units.</p> <p>(9) A brief description of the CMS.</p> <p>(10) The date of the latest CMS certification or audit.</p> <p>(11) A description of any changes in CMS, processes, or controls since the last reporting period.</p>	40 CFR Section 63.2281(e)
<p>(g) Each affected source that obtained a title V operating permit pursuant to 40 CFR parts 70 or 71 must report all deviations as defined in subpart DDDD in the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to subpart DDDD along with, or as part of, the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in subpart DDDD, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.</p>	40 CFR Section 63.2281(g)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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

EU 100 Boiler 1 (70 mmBtu/hr)

EU 101 Boiler 2 (70 mmBtu/hr)

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 natural gas	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Daily Steam Production Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain records of the GP 003 total steam production for the previous calendar day. 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
MONITORING AND RECORDKEEPING	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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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 Line 2

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) nad Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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 before 06/17/2009 to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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 Line 1

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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 013 Sawline System Line 2

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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
Performance Test: due before 06/17/2009 to measure Total Particulate Matter, Particulate Matter less than 10 microns and opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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 90 days after Resuming Operation to measure Total Particulate Matter, Particulate Matter less than 10 microns, and Opacity.	Title I Condition: Monitoring for Title I (BACT and modeling) limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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) and Minn. R. 7007.3000; 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: Operating requirement for Title I Limit (40 CFR Section 52.21) and Minn. R. 7007.3000; 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-24

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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

A-25

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: EU 128 Power Cogeneration Boiler 232 mmBtu/hr

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
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.030 lbs/million Btu heat input . This limit is more stringent than the 0.10 lb/mmBtu limit in Section 60.43b(c)(1) that also applies.	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 measured as carbon 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 or green wood fuel, dry or green wood waste, propane, and natural gas. Also up to one percent by weight (on a calendar month basis) of the total fuel combusted may consist of manufacturing residue when EU 108 is not combusting manufacturing residue. EU 128 is prohibited from combusting manufacturing residue when EU 108 is combusting manufacturing residue.	Minn. R. 7007.0800, subp. 2
<p>Manufacturing Residue: 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), corrugated cardboard unsuitable for recycling, and absorbent material containing spilled oil, anti-freeze, water-based paints, or soy or water-based ink.</p> <p>Manufacturing residue shall not contain 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. For absorbent materials containing spilled liquids other than oil, shall not contain any hazardous waste listed in Minn. R. 7045.0135 or any wastes specified in Minn. R. 7045.0131 as hazardous. Oil in any absorbent material shall only be on-specification used oil.</p>	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) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 and 14
CE 038 Number of Fields On-line: no less than three, 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 and Minn. R. 7007.3000; 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 and Minn. R. 7007.3000; 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 and Minn. R. 7007.3000; 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 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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
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
PERFORMANCE TESTING	hdr
Performance Test: due 365 days after Resuming Operation of the cogeneration boiler, to determine EU 128 opacity, total particulate matter, particulate matter less than 10 microns, volatile organic compound, and carbon monoxide emissions.	Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; 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%. 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.	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 resumption of EU 128 operation. 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
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
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-28

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

All CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.	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)
The Permittee shall reduce all CEMS data to 1-hour averages in accordance with Minn. R. 7017.1160 and 40 CFR 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 and Minn. R. 7007.3000; 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 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 and 5
Daily Recordkeeping - Fuel Use: On each day of operation, the Permittee shall calculate, record, and maintain records of, the total weight of fuel fed to the cogeneration boiler, as well as the total weight of the manufacturing residue added to the cogeneration boiler fuel stream during the previous calendar day.	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 burned in the cogeneration boiler during the previous month based on the daily records.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: EU 130 Line 2 Press

Associated Items: CE 045 Oxidizer (Catalytic/Thermal)

SV 018 Line 2 Press (Oxidizer)

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
<p>EU 130 is a process included in the definition of an existing affected source as defined in the Plywood and Composite Wood Products MACT Standard at Section 63.2232. The Permittee must comply with the applicable compliance options, operating requirements, and work practice requirements found in 40 CFR part 63 subpart DDDD for EU 130 no later than the extended compliance date of October 1, 2008. The Permittee has elected to implement the add-on control equipment compliance option and therefore CE 045 must be installed and operating no later than October 1, 2008.</p> <p>The extension approval letter is located in Appendix G of this permit.</p>	40 CFR Sections 63.2232, 63.2233(b); and 63.6(i)
Materials Mix Rate: less than or equal to 10% softwood by weight for EU 130, on a calendar week average basis.	Minn. R. 7017.2025, subp. 3
Reduce Line 2 press methanol emissions by 90 percent by using an emissions control system.	40 Section CFR 63.2240(b) & part 63 subpart DDDD Table 1B Option 3
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) and Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 10.0 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling) and 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) and 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 4.5 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling) and 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) and Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 15.0 lbs/hour measured as carbon 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 measured as carbon 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) and Minn. R. 7007.3000
Total Particulate Matter: less than or equal to 10.0 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
<p>General Requirements:</p> <p>(a) The Permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements in this subpart at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in Section 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.</p> <p>(continued)</p>	40 CFR Section 63.2250
<p>General Requirements (continued):</p> <p>(b) The Permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in Section 63.6(e)(1)(i).</p> <p>(c) The Permittee must develop a written SSMP according to the provisions in Section 63.6(e)(3).</p>	40 CFR Section 63.2250
Follow the applicable General Provisions in Sections 63.1 through 63.13 as listed in Table 10 to part 63 subpart DDDD. A copy of Table 10 is included in Appendix F of this permit.	40 CFR Section 63.2290

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

CONTROL EQUIPMENT REQUIREMENTS	hdr
Pollution Control Equipment Operating Requirement: the Permittee shall operate and maintain CE 045 whenever Line 2 press is operating.	Minn. R. 7007.0800, subp. 2 and 14
Temperature: greater than or equal to 1500 degrees F using 3-hour Block Average at the combustion chamber when operating CE 045 in regenerative mode, 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 methanol destruction efficiency was demonstrated. For the first three hours after CE 045 startup, the continuous average chamber temperature shall be used instead of the 3-hour block average. If the three-hour block average temperature or the startup chamber temperature drops below the minimum temperature limit, this shall be reported as a deviation.	Minn. R. 7007.0800, subp. 2 and 14; meets requirements of 40 CFR 63.2240(b) & part 63 subpart DDDD Table 2 Option 1
Temperature: greater than or equal to 800 degrees F using 3-hour Block Average at the combustion chamber when operating CE 045 in catalytic mode, 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 methanol destruction efficiency was demonstrated. For the first three hours after CE 045 startup, the continuous average chamber temperature shall be used instead of the 3-hour block average. If the three-hour block average temperature or the startup chamber temperature drops below the minimum temperature limit, this shall be reported as a deviation.	Minn. R. 7007.0800, subp. 2 and 14; meets requirements of 40 CFR 63.2240(b) & part 63 subpart DDDD Table 2 Option 1
<p>Temperature Monitoring: For each temperature monitoring device, the Permittee must meet the requirements in paragraphs (a) and (b)(1) through (6) of Section 63.2269.</p> <p>(a) The Permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to paragraphs (a)(1) through (3) of Section 63.2269.</p> <p>(1) The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.</p> <p>(2) At all times, the Permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>(3) Record the results of each inspection, calibration, and validation check.</p> <p>(continued)</p>	40 CFR Section 63.2269(a)
<p>Temperature Monitoring (cont.):</p> <p>(b) (1) Locate the temperature sensor in a position that provides a representative temperature.</p> <p>(2) Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.</p> <p>(3) If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.</p> <p>(continued)</p>	40 CFR Section 63.2269(b)
<p>Temperature Monitoring (cont.):</p> <p>(4) Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owners manual. Following the electronic calibration, the Permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.</p> <p>(5) Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.</p> <p>(6) At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.</p>	40 CFR Section 63.2269(b)
<p>(a) Monitor and collect data according to section 63.2270.</p> <p>(b) Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, do not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The Permittee must use all the data collected during all other periods in assessing compliance.</p> <p>(continued)</p>	40 CFR Section 63.2270(a) and (b)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(continued from above)</p> <p>A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.</p>	<p>40 CFR Section 63.2270(b)</p>
<p>(c) The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control system.</p> <p>(d) Determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in paragraphs (b) and (c) of Section 63.2270).</p>	<p>40 CFR Section 63.2270(c) and (d)</p>
<p>(f) To calculate the data averages for each 3-hour or 24-hour averaging period, the Permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in paragraphs (b) and (c) of Section 63.2270).</p>	<p>40 CFR Section 63.2270(f)</p>
<p>(a) The Permittee must demonstrate continuous compliance with the compliance options, operating requirements, and work practice requirements in Sections 63.2240 and 63.2241 that apply according to the methods specified in Tables 7 and 8 to subpart DDDD.</p> <p>(b) The Permittee must report each instance in which the applicable compliance option, operating requirement, and work practice requirement in Tables 7 and 8 to subpart DDDD were not met. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in paragraphs (b)(1) through (3) of Section 63.2271. These instances are deviations from the compliance options, operating requirements, and work practice requirements in subpart DDDD. These deviations must be reported according to the requirements in Section 63.2281.</p>	<p>40 CFR Section 63.2271(a) and (b)</p>
<p>(b)(1) [Reserved]</p> <p>(2) Consistent with Sections 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the EPA Administrator's satisfaction that the Permittee was operating in accordance with Section 63.6(e)(1). The EPA Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in Section 63.6(e).</p> <p>(3) Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the Permittee demonstrates to the EPA Administrator's satisfaction that the Permittee was operating in accordance with the approved routine control device maintenance exemption.</p>	<p>40 CFR Section 63.2271(b)</p>
<p>Routine Control Device Maintenance Exemption: The Permittee may request a routine CE 045 maintenance exemption from the EPA Administrator for routine maintenance events such as bakeouts, washouts, media replacement, and replacement of corroded parts. The request must justify the need for the routine maintenance on CE 045 and the time required to accomplish the maintenance activities, describe the maintenance activities and the frequency of the maintenance activities, explain why the maintenance cannot be accomplished during process shutdowns, describe the reasonable efforts that will be made to minimize emissions during the maintenance, and provide any other documentation required by the EPA Administrator.</p> <p>The routine CE 045 maintenance exemption must not exceed 0.5 percent of annual operating uptime for EU 130.</p> <p>(continued)</p>	<p>40 CFR Section 63.2251</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Routine Control Device Maintenance Exemption (cont.): The request for the routine control device maintenance exemption, if approved by the EPA Administrator, must be incorporated by reference in and attached to the affected source's title V permit.</p> <p>The compliance options and operating requirements do not apply during times when control device maintenance covered under the approved routine control device maintenance exemption is performed. The Permittee must minimize emissions to the greatest extent possible during these routine control device maintenance periods.</p> <p>To the extent practical, startup, shutdown of emission control systems must be scheduled during times when process equipment is also shutdown.</p>	<p>40 CFR Section 63.2251</p>
<p>PERFORMANCE TESTING AND COMPLIANCE DEMONSTRATION</p>	<p>hdr</p>
<p>Performance Test: due before 10/16/2008 to determine Volatile Organic Compound emissions. Testing shall be conducted after CE 045 is in service for the control of EU 130 emissions, but not later than October 15, 2008.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before 06/01/2011 to determine Opacity, Total Particulate Matter, Particulate Matter less than 10 microns, and Carbon Monoxide emissions.</p>	<p>Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1</p>
<p>Formaldehyde Performance Test: The Permittee shall conduct a single performance test for formaldehyde emissions simultaneously with the VOC performance test due 10/15/2008 for determining the effect of CE 045 on EU 130 formaldehyde emissions.</p> <p>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.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Initial Performance Test: due 180 days after 10/01/2008 to demonstrate initial compliance for methanol removal efficiency.</p> <p>To demonstrate initial compliance with the compliance options and operating requirements, the Permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 of subpart DDDD according to the requirements in Section 63.2262 and Table 4 of subpart DDDD.</p> <p>Conduct performance tests upon initial startup or no later than 180 calendar days after the compliance date specified in Section 63.2233 and according to Section 63.7(a)(2), whichever is later. Note that the compliance date specified in Section 63.2233 has been extended by 12 months to October 1, 2008 according to the requirements of Section 63.6(i).</p>	<p>40 CFR Section 63.6(i); 40 CFR Sections 63.2260(a) and 63.2261(a)</p>
<p>Performance Testing: conduct each performance test used to determine compliance with the applicable limit in part 63 subpart DDDD Table 1B, according to the requirements in Section 63.7(e)(1), the requirements in paragraphs (b) through (l) of Section 63.2262, and according to the applicable methods specified in Table 4 of part 63 subpart DDDD.</p>	<p>40 CFR Section 63.2262(a) and part 63 subpart DDDD Table 4 items (1) - (4), (7), (9), and (10)</p>
<p>Initial Compliance Demonstration: either use a wood products enclosure as defined in Section 63.2292 or measure the capture efficiency of the capture device for the press using Methods 204 and 204A through 204F of 40 CFR part 51, appendix M (as appropriate), or using the alternative tracer gas method contained in appendix A to subpart DDDD. The Permittee must submit documentation that the wood products enclosure meets the press enclosure design criteria in Section 63.2292 or the results of the capture efficiency verification with the Notification of Compliance Status.</p>	<p>40 CFR Section 63.2267</p>
<p>Compliance Demonstration: Compliance has been demonstrated compliance for methanol destruction efficiency if:</p> <p>(4) Line 2 Press methanol emissions measured using the methods in Table 4 to subpart DDDD over the 3-hour performance test, are reduced by at least 90 percent, as calculated using the procedures in Section 63.2262; AND the Permittee has a record of the oxidizer operating temperatures as required by Table 2 of subpart DDDD over the performance test during which emissions were reduced by at least 90 percent;</p> <p>(6) The Permittee submits the results of Line 2 Press capture efficiency verification using the methods in Table 4 to subpart DDDD with the Notification of Compliance Status.</p>	<p>40 CFR Part 63 subpart DDDD table 5 items (4) and (6)</p>
<p>RECORDKEEPING</p>	<p>hdr</p>
<p>If the 3-hour block average temperature drops below the minimum temperature limit, the VOC emitted during that time shall be considered uncontrolled until the average minimum temperature limit is once again achieved. This shall be reported as a deviation.</p>	<p>Minn. R. 7007.0800, subp. 5</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>Softwood Percentage Monitoring and Recordkeeping: Each day of operation the Permittee shall calculate and record the type (hardwood and softwood) and amount (by mass) of each wood processed. By the close of business on each Monday, the Permittee shall calculate the percent by weight of softwood processed as well as the total amount of wood processed during the previous calendar week.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>(a) The Permittee must keep the following records: (1) A copy of each notification and report submitted to comply with subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in Section 63.10(b)(2)(xiv). (2) The records in Section 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction. (3) Documentation of approved routine control device maintenance exemption, if a request for such an exemption is made under Section 63.2251. (4) Records of performance tests and performance evaluations as required in Section 63.10(b)(2)(viii). (b) The Permittee must keep the records required in Tables 7 and 8 to subpart DDDD to show continuous compliance with each compliance option, operating requirement, and work practice requirement that applies. (e) The Permittee must keep records of annual catalyst activity checks and subsequent corrective actions.</p>	<p>40 CFR Section 63.2282(a), (b), and (e)</p>
<p>(a) Records must be in a form suitable and readily available for expeditious review as specified in Section 63.10(b)(1). (b) As specified in Section 63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (c) Record must be kept on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to Section 63.10(b)(1). Records can be kept offsite for the remaining 3 years.</p>	<p>40 CFR Section 63.2283(a), (b), and (c)</p>
<p>NOTIFICATIONS</p>	<p>hdr</p>
<p>(a) The Permittee must submit all of the notifications in Sections 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified. (b) The Permittee must submit an Initial Notification no later than 120 calendar days after September 28, 2004, or after initial startup, whichever is later, as specified in Section 63.9(b)(2). This has been completed. (c) If the Permittee is required to conduct a performance test, the Permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in Section 63.7(b)(1).</p>	<p>40 CFR Section 63.2280</p>
<p>(d) If the Permittee is required to conduct a performance test, design evaluation, or other initial compliance demonstration as specified in Tables 4, 5, and 6 to subpart DDDD, submit a Notification of Compliance Status as specified in Section 63.9(h)(2)(ii). (1) For each initial compliance demonstration required in Table 5 or 6 to subpart DDDD that does not include a performance test, submit the Notification of Compliance Status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration. (2) For each initial compliance demonstration required in Tables 5 and 6 to subpart DDDD that includes a performance test conducted according to the requirements in Table 4 to subpart DDDD, submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Section 63.10(d)(2).</p>	<p>40 CFR Section 63.2280</p>
<p>(e) If the Permittee requests a routine control device maintenance exemption according to Section 63.2251, the Permittee must submit the request for the exemption no later than 30 days before the compliance date. (g) The Permittee must notify the EPA Administrator within 30 days before taking any of the actions specified in paragraphs (g)(1) and (3) of Section 63.2280. (1) The Permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements in subpart DDDD. (3) The Permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.</p>	<p>40 CFR Section 63.2280</p>
<p>REPORTING</p>	<p>hdr</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(a) The Permittee must submit each report in Table 9 to subpart DDDD that applies. (b) Unless the EPA Administrator has approved a different schedule for submission of reports under Section 63.10(a), submit each report by the date in Table 9 to subpart DDDD and as specified in paragraphs (b)(1) through (5) of Section 63.2281. (1) The first compliance report must cover the period beginning on the compliance date that is specified for the Permittee's affected source in Section 63.2233 ending on June 30 or December 31, and lasting at least 6 months, but less than 12 months. For example, if the compliance date is March 1, then the first semiannual reporting period would begin on March 1 and end on December 31. (2) The first compliance report must be postmarked or delivered no later than July 31 or January 31 for compliance periods ending on June 30 and December 31, respectively.</p>	<p>40 CFR Section 63.2281(a) and (b)</p>
<p>(b)(3) Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. (4) Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively. (5) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A), the Permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (4) of Section 63.2281.</p>	<p>40 CFR Section 63.2281(b)</p>
<p>(c) The compliance report must contain the information in paragraphs (c)(1) through (8) of Section 63.2281. (1) Company name and address. (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. (3) Date of report and beginning and ending dates of the reporting period. (4) If there was a startup, shutdown, or malfunction during the reporting period and actions were taken consistent with the SSMP, the compliance report must include the information specified in Section 63.10(d)(5)(i). (5) A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in paragraphs (c)(5)(i) through (iii) of Section 63.2281.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(5)(i) The date and time when the control device was shut down and restarted. (ii) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline. (iii) A statement of whether or not the control device maintenance was included in the approved routine control device maintenance exemption developed pursuant to Section 63.2251. If the control device maintenance was included in the approved routine control device maintenance exemption, then the Permittee must report the information in paragraphs (c)(5)(iii)(A) through (C) of Section 63.2281. (A) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(5)(iii)(B) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period. (C) Based on the information recorded under paragraphs (c)(5)(iii)(A) and (B) of this section for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using Equation 1 of Section 63.2281.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(c)(5)(iii)(C) Equation 1 $RM = (DTp + DTc)/(PUp + PUc)$ Where: RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance; PUp= Process unit uptime for the previous semiannual compliance period; PUc= Process unit uptime for the current semiannual compliance period; DTp= Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period; DTc= Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.</p>	<p>40 CFR Section 63.2281(c)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

<p>(c)(6) The results of any performance tests conducted during the semiannual reporting period. (7) If there are no deviations from any applicable compliance option or operating requirement, and there are no deviations from the requirements for work practice requirements in Table 8 to subpart DDDD, a statement that there were no deviations from the compliance options, operating requirements, or work practice requirements during the reporting period. (8) If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in Section 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.</p>	<p>40 CFR Section 63.2281(c)</p>
<p>(d) For each deviation from a compliance option or operating requirement and for each deviation from the work practice requirements in Table 8 to subpart DDDD that occurs at an affected source where a CMS is not used to comply with the compliance options, operating requirements, or work practice requirements in subpart DDDD, the compliance report must contain the information in paragraphs (c)(1) through (6) of Section 63.2281 and in paragraphs (d)(1) and (2) of Section 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance. (1) The total operating time of each affected source during the reporting period. (2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.</p>	<p>40 CFR Section 63.2281(d)</p>
<p>(e) For each deviation from a compliance option or operating requirement occurring at an affected source where a CMS is used to comply with the compliance options and operating requirements in this subpart, the Permittee must include the information in paragraphs (c)(1) through (6) and paragraphs (e)(1) through (11) of Section 63.2281. This includes periods of startup, shutdown, and malfunction and routine control device maintenance. (1) The date and time that each malfunction started and stopped. (2) The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks. (3) The date, time, and duration that each CMS was out-of-control, including the information in Section 63.8(c)(8).</p>	<p>40 CFR Section 63.2281(e)</p>
<p>(e)(4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in the approved routine control device maintenance exemption; or during another period. (5) A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period. (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes. (7) A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.</p>	<p>40 CFR Section 63.2281(e)</p>
<p>(e)(8) A brief description of the process units. (9) A brief description of the CMS. (10) The date of the latest CMS certification or audit. (11) A description of any changes in CMS, processes, or controls since the last reporting period.</p>	<p>40 CFR Section 63.2281(e)</p>
<p>(g) Each affected source that obtained a title V operating permit pursuant to 40 CFR parts 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to subpart DDDD along with, or as part of, the semiannual monitoring report required by Section 70.6(a)(3)(iii)(A) or Section 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in subpart DDDD, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.</p>	<p>40 CFR Section 63.2281(g)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-36

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: EU 136 Edge Sealers (Group 1 miscellaneous coating operations)

What to do	Why to do it
EU 136 are Group 1 miscellaneous coating operations as defined at 40 CFR Section 63.2292. The Permittee must comply with the work practice requirements by October 1, 2007 for the EU 136 Group 1 miscellaneous coating operations.	40 CFR Section 63.2233(b)
Use non-HAP coatings as defined in 40 CFR Section 63.2292.	40 CFR Section 63.2241(a) and Part 63 Subpart DDDD Table 3 item 5
<p>Initial Compliance Demonstrations for Work Practice Requirements:</p> <p>The Permittee shall demonstrate initial compliance with work practice requirements by meeting all of the following requirements:</p> <ol style="list-style-type: none"> 1. meet the work practice requirement at Section 63.2241(a); 2. submit a signed statement with the Notification of Compliance Status indicating that only non-HAP coatings are used; 3. maintain a record showing that only non-HAP coatings are used. 	40 CFR Section 63.2260(b) and Part 63 Subpart DDDD Table 6 item 5
<p>Continuous Compliance With the Work Practice Requirements:</p> <p>The Permittee must continue to use non-HAP coatings and keep records showing that they are using non-HAP coatings.</p>	40 CFR Section 63.2271(a) and Part 63 Subpart DDDD Table 8 item 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-37

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: EU 137 NG-fired package boiler (51 mmBtu/hr)**Associated Items:** SV 003 Keeler Boiler Stack

What to do	Why to do it
Permitted Fuel: Natural gas only	Minn. R. 7007.0800, subp. 2
Recordkeeping: record and maintain records of the amount of natural gas combusted in EU 137 during each calendar month.	40 CFR Section 60.48c(g)(2)

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-38

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: MR 002 Cogen Boiler NOx**Associated Items:** CM 002 Cogen Boiler: 0.20 lbs NOx/mmBtu, EU 128, 24-hr ave.

What to do	Why to do it
CEMS Cylinder Gas Audit (CGA): due before end of each calendar quarter following Resuming Operation of EU 128 and MR 002, except that a CGA is not required during any calendar half year in which a RATA was performed. CGAs shall be conducted at least three months apart but no more than eight months apart. A CGA shall be conducted according to the procedures in 40 CFR pt. 60, Appendix F, section 5.1.2. If the monitored emission unit was operated for less than 24 hours during the calendar half year, a CGA is not required for that calendar half year.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each year following Resuming Operation of EU 128 operation. 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 F.	Minn. R. 7017.1170, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-39

02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Subject Item: MR 003 Cogen Boiler O2**Associated Items:** CM 002 Cogen Boiler: 0.20 lbs NOx/mmBtu, EU 128, 24-hr ave.

What to do	Why to do it
CEMS Cylinder Gas Audit (CGA): due before end of each calendar quarter following Resuming Operation of EU 128, except that a CGA is not required during any calendar half year in which a RATA was performed. CGAs shall be conducted at least three months apart but no more than eight months apart. A CGA shall be conducted according to the procedures in 40 CFR pt. 60, Appendix F, section 5.1.2. If the monitored emission unit was operated for less than 24 hours during the calendar half year, a CGA is not required for that calendar half year.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each year following Resuming Operation of EU 128 operation. 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 F.	Minn. R. 7017.1170, subp. 5

TABLE B: SUBMITTALS

B-1 02/29/08

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji
Permit Number: 05700005 - 005

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.

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

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 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

Send any application for a permit or permit amendment to:

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

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.

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

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 compliance status	due 60 days after Performance Test required by subpart DDDD according to 40 CFR Section 63.9(h)(2)(ii) and Section 63.2280(d). For each initial compliance demonstration, the Permittee must submit the NOCS, including all performance test results, according to 40 CFR Section 63.10(d)(2).	EU130, GP002
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup of CE 045 (after reassignment of CE 045 to EU 130).	CE045
Notification	due 15 days after Equipment Removal and/or Dismantlement for permanent shutdown of the Line 1 Dryers (EU 009, EU 010, EU 011, and EU 012) and Line 1 Press (EU 129).	Total Facility
Notification	due 15 days after Resuming Operation of the emission unit. The notification shall identify the emission unit and the date that operation resumed.	EU090, EU128
Performance Test Notification (written)	due 60 days before Performance Test for determining methanol reduction efficiency. The notification shall meet the requirements specified in Section 63.7(b)(1).	EU130, GP002
Performance Test Report	due 45 days after Performance Test for determining methanol reduction efficiency.	EU130, GP002
Relative Accuracy Test Audit (RATA) Notification	due 30 days before CEMS Relative Accuracy Test Audit (RATA)	MR002, MR003
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after CEMS Relative Accuracy Test Audit (RATA)	MR002, MR003
Testing Frequency Plan	due 60 days after Initial Performance Test for EU 130 (CE 045/SV 018) methanol removal efficiency. The plan shall propose a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.	EU130
Testing Frequency Plan	due 60 days after Initial Performance Test for GP 002 (CE 049/SV 002) methanol removal efficiency. The plan shall propose a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.	GP002
Testing Frequency Plan	due 60 days after Performance Test for Opacity, Total Particulate Matter, Particulate Matter less than 10 microns, and Carbon Monoxide emissions. The plan shall propose a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.	EU130
Testing Frequency Plan	due 60 days after Performance Test for opacity, total particulate matter, particulate matter less than 10 microns, volatile organic compound, and carbon monoxide emissions.	EU128

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

Testing Frequency Plan	due 60 days after Performance Test for Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds, and opacity. The plan shall specify a testing frequency based on variability of individual test run results, contrast between test results and emission factors used in projected actual emission calculations, and the margin between actual facility emission increases and 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 plan by the MPCA.	GP002
Testing Frequency Plan	due 60 days after Performance Test for Volatile Organic Compound emissions. The plan shall propose a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.	EU130

TABLE B: RECURRENT SUBMITTALS

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 005

What to send	When to send	Portion of Facility Affected
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar quarter following Resuming Operation of EU 128 and MR 001. This Summary shall be submitted when a COMS Calibration Audit is completed during the calendar quarter.	MR001
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following end of the calendar quarter in which the Audit was performed	MR002, MR003
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Resuming Operation of EU 128 and MR 001 (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.	MR001
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Resuming Operation of EU 128 and MR 002 (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.	MR002
Semiannual Compliance Report	<p>due 31 days after end of each calendar half-year starting 10/01/2007. The first compliance report must cover the period beginning on the compliance date that is specified for your affected source in Section 63.2233 ending on June 30 or December 31, and lasting at least 6 months, but less than 12 months. For example, if the applicable compliance date is March 1, then the first semiannual reporting period would begin on March 1 and end on December 31.</p> <p>This report should be submitted with the total facility semiannual deviations report.</p>	EU130, GP002
Semiannual Deviations Report	<p>due 30 days after end of each calendar half-year starting 06/17/2004. 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.</p> <p>This report should include the semiannual compliance reports required for GP 002 and EU 130 for the respective time period.</p>	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 06/17/2004 (for the previous calendar year). Submit the certification on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This certification covers all deviations experienced during the calendar year.	Total Facility

APPENDICES

Appendix A	(not used in this permit)	
Appendix B	List of Insignificant Activities.....	page 2
Appendix C	Stack Parameters - Revised.....	page 3
Appendix D	Fugitive Dust Control Plan (Revised April 12, 2007).....	page 4
Appendix E	Applicability Analysis (unchanged) - refer to permit No. 05700005-001	
Appendix F	Part 63 Subpart DDDD Table 10.....	page 10
Appendix G	August 22, 2007 NESHAP Extension Approval Letter.....	page 16

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>The facility 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 qualify under this subpart include:</i> <ul style="list-style-type: none"> • <i>Bark piles</i> • <i>Radial stacker</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 at the Bemidji facility that qualify under this subpart include:</i> <ul style="list-style-type: none"> • <i>Parts washer – maintenance shop</i> • <i>Yard hog</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 at the Bemidji facility that qualify under this subpart include:</i> <ul style="list-style-type: none"> • <i>EU 136 Edge Sealers</i> (also listed in Table A of this permit) 	Part 63, Subpart DDDD PCWP MACT Standard

ID	Description	Stack Height (ft)	Stack Height (m)	Stack Temp. (°F)	Stack Temp (°K)	Stack Exit Velocity (ft/min)	Stack Exit Velocity (m/sec)	Stack Diam. (ft)	Stack Diam. (m)	NO _x (lb/hr)	CO (lb/hr)	PM ₁₀ (lb/hr)
GP 001	Line 1 Dryers (1,2,3,4) SV-004	135	41.148	260	399.8	3898	19.80	7	2.134	0	0	0
GP 002	Line 2 Dryers 5, 6, 7 SV 002	135	41.148	260	399.8	1733	8.80	10.5	3.20	54	30	12
GP 003	Keeler/Package Blrs Scenario 1 ^a	110	33.528	400	477.6	1034	5.25	4.3	1.31	7.76	6.44	0.58
GP 003	Keeler/Package Blrs Scenario 2 ^a	110	33.528	450	505.4	5612	28.51	4.3	1.31	28.3	23.7	2.5
EU 036	Line 1 Blending System	62	18.898	68	293.15	3534	17.95	3.7	1.13	---	---	1.3
EU 040	Line 2 Dry Fuel Prep System	40	12.192	68	293.15	873	4.44	2.7	0.82	---	---	0.17
EU 050	Line 1 Sawline System	45	13.716	68	293.15	3242	16.47	3.6	1.10	---	---	1.13
EU 051	Line 1 Sanding System	54	16.459	68	293.15	1710	8.68	6.4	1.95	---	---	1.89
EU 053	Line 2 Sawline System	46	14.021	68	293.15	1238	6.29	6	1.83	---	---	1.2
EU 062	Line 1 Forming System	61	18.593	68	293.15	3255	16.54	3.7	1.13	---	---	1.2
EU 090	Line 1 Hogged Fuel System	33	10.058	68	293.15	1949	9.90	2.8	0.85	---	---	0.41
EU 094	Line 1 Dry Fuel System	33	10.058	68	293.15	1130	5.74	2.6	0.79	---	---	0.21
EU 128	Power Cogeneration Boiler	110	33.528	300	422.0	3977	20.20	6	1.83	46.4	46.4	6.96
EU 129	Line 1 Press	138	42.062	122	323.15	4482	22.77	5	1.524	0	0	0
EU 130	Line 2 Press SV 018	135	41.15	250	394.26	2209	11.22	7.0	2.13	4.0	4.5	10.0

^aScenario 1 is the 51 mmBtu/hr NG package boiler only; Scenario 2 is two Keeler boilers and package boiler combusting NG only

^bCogeneration boiler not operating at this time but was included in modeling in order to facilitate future operation if desired by Ainsworth

Strikethrough data is for sources no longer permitted to operate.

Ainsworth Engineered USA LLC
Bemidji OSB Plant

Fugitive Dust Control Plan

APPENDIX D

Date:
September 5, 2007

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1. Introduction

This document is intended to provide the fugitive dust control plan for the Bemidji OSB plant.

1.1. Regulatory Requirement

Ainsworth Engineered USA LLC, Bemidji OSB Plant has a current Title V operating permit issued by the MPCA, Air Emissions Permit #05700005.

Table “A” of that permit states that:

Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material, which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements of Minn. R. 7011.0150.

Fugitive Dust Control Plan: The Permittee shall follow the actions and record keeping specified in the control plan. Amendments to the plan may be proposed by the Permittee and are subject to review and approval by the Commissioner. The plan shall continue to carry forward the control requirements and preventative measures from Section 6.16 of air emission permit 05700005-005 and shall identify all fugitive emission sources, primary and contingent control measures, and record keeping. 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.

1.2. Dust Control Season

The dust control season starts on May 1st, and ends on October 15th of each calendar year. If the facility shuts down OSB manufacturing operations for any period exceeding two consecutive weeks, the entire fugitive dust control plan and related requirements are suspended starting the 15th day of the shutdown and shall remain suspended until the first day of the resumption of manufacturing..

1.3. Implementation

This plan is effective upon review and approval of the Minnesota Pollution Control Agency.

2. Fugitive Emission Sources

Fugitive particulate emissions from this facility are primarily due to vehicle traffic. Wood bark and dried fuel storage piles can also be minor sources for fugitive dust.

2.1. Log Trucks

Logging trucks entering and exiting the plant are the largest single contributor to fugitive

particulate emissions. Bark debris, dirt, and vehicle dust are the sources to log truck fugitive emissions. These trucks travel on both paved and unpaved roads.

2.2. Finished Product / Delivery Vehicles

Finished product trucks and other delivery vehicles are contributors to fugitive particulate emissions. Examples of other vehicle traffic include trash removal, wood fuel transportation, parts delivery, resin and/or wax delivery trucks, etc. These vehicles travel on paved roads and unpaved roads.

2.3. Employee Vehicles

Employee vehicle traffic is a minor contributor to fugitive particulate emissions. Employee traffic is limited to paved roads and parking lots.

2.4. Wood Fuel Piles

Bark fuel piles can be a minor contributor to fugitive particulate emissions.

3. Control Measures

The primary and secondary fugitive dust control measures are described for each of the four areas described in this plan.

3.1. Paved Roads

All of the paved roads on the plant site are paved with road widths sufficient to allow safe two-way truck traffic without traveling on the shoulder of the road. The major source of deposits on the paved roads includes debris carryout and entrainment from log trucks.

3.1.1. Primary Control

During the dust control season, during non-freezing weather, the plant shall mechanically clean the paved roads one time each week. Mechanical cleaning is defined as any method(s) to clean the surface of loose dust or dirt that could become air entrained due to vehicular traffic such as pressure washing, sweeping, vacuuming or other mechanical systems. Mechanical cleaning shall include methods that minimize fugitive emissions during the cleaning process.

If there is at least 0.25" of rainfall in a 24-hour period, the weekly cycle for road sweeping shall start over, and the next sweeping will be required within 7 days, unless sufficient rainfall occurs to restart the cycle again. Plant experience has shown that a rainfall of at least 0.25" in a 24-hour period cleans the paved roads as effectively as vacuum sweeping has done. The plant will maintain records to demonstrate compliance with this requirement.

3.1.2. Secondary Control

The following preventative measures shall be done to reduce fugitive dust emissions on paved roads:

- a) All trucks hauling wood fuel or trash shall be covered.
- b) Speed limits on paved roads shall be posted.
- c) Ainsworth will instruct log truck operators to sweep off their trucks in the proper area before returning to the paved roads.
- d) During the winter, snow shall be plowed and sand shall be used for traction control.

- e) Sand shall be broadcast by shovel and mechanical equipment.
- f) Any residual sand piles left after the spring thaw shall be graded level on the road shoulder.

3.2. Paved Parking Lots

3.2.1. Primary Control

The paved parking area shall be cleaned with pressurized water by May 1st of each year (weather permitting) and thereafter using mechanical cleaning methods once a month during non-freezing conditions throughout the dust control season. If there is at least 0.25” of rainfall in a 24-hour period, the monthly cycle for parking lot cleaning shall start over, and the next cleaning will be required within one month, unless sufficient rainfall occurs to restart the cycle again. Plant experience has shown that a rainfall of at least 0.25” in a 24-hour period cleans the paved parking area as effectively as pressure washing or mechanical cleaning has done. The plant will maintain records to demonstrate compliance with this requirement.

3.2.1. Secondary Control

There are no secondary control measures for this portion of the fugitive dust control plan.

3.3. Unpaved Roads

The unpaved roads on the plant sites provide access to the log yards. The vast majority of plant traffic on unpaved roads is for log delivery / handling. There are other unpaved roads on the site that receive minimal use such as maintenance vehicle access on an as-needed basis.

3.3.1. Primary Control

During the dust control season, during non-freezing weather, plant personnel shall apply chemical dust suppressant (Calcium Chloride, Magnesium Chloride or equivalent) on the log yard unpaved roads. This dust suppressant will initially be applied within the first month of the dust control season according to the supplier’s technical recommendations. The chemical dust suppressant will be reapplied as required to maintain effective coverage and dust suppression through the entire dust control season.

3.3.2. Secondary Control

In addition to the chemical dust suppressant applications, the following preventative measures shall be done to enhance the dust control on the unpaved roads:

- a) Employees’ vehicles shall be restricted on unpaved roads.
- b) Speed limits on unpaved roads shall be posted at 5 mph.
- c) Log yard unloading equipment shall take the shortest routes possible between the log yard and the plant site.
- d) During the winter, snow shall be plowed on unpaved roads only as necessary for proper and safe access.
- e) Sand shall be broadcast by shovel and mechanical equipment.
- f) After the spring thaw, the unpaved roads shall be graded prior to the first application of the dust season.
- g) Dust suppressant chemicals shall be applied to maintenance roads on an as-needed basis per Ainsworth discretion.

3.4. Wood Fuel Piles

Wood bark from the facility is combusted on site as fuel. Typically, the fuel is conveyed to a pile via the radial stacker and then conveyed to the Thermal Oil heater or Power Boiler. This fuel has moisture content of approximately 45% and thus there are minimal fugitive dust emissions from any bark fuel pile. Occasionally, the facility's dry fuel system experiences a process upset and dry wood fuel will be diverted to an outside pile. When dry fuel is diverted outside of a plant building, it can no longer be used as on site suspension burner fuel and thus is included with the bark fuel.

3.4.1. Primary Control

Handling the bark as little as possible minimizes fugitive dust emissions. Whenever practical, the radial stacker will feed directly into the bark reclaim system, thus minimizing the amount of fuel handling. When this procedure is not feasible, bark fuel will be moved from the stockpile using a front-end loader. The plant will make all efforts to minimize the amount of wood bark fuel that is stockpiled on site. The primary control means for minimizing any fugitive dust emissions from the dry fuel system is to keep the dry fuel system fully operational.

3.4.2. Secondary Control

There are no secondary control measures for the bark fuel pile. In those infrequent instances where dry fuel is diverted outside the facility's buildings, this material will be mixed with bark as soon as practical..

4. Recordkeeping

The plant will maintain adequate records to demonstrate compliance with this plan. These records will cover every day during the dust control season (May 1 to October 15), and include the following information:

1. Daily: Date, outside temperature, rainfall in previous 24 hour period.
2. Paved road cleaning: operator initials, start and stop time.
3. Paved parking lot cleaning: operator initials, start and stop time.
4. Chemical dust suppressant applications: approximate start time, operator's initials, type and amount of suppressant used, dilution ratio.

If the facility shuts down OSB manufacturing operations as described in Section 1.2, a memo will be filed with the dust control plan records to document this event. All records will be maintained on site for five years.

Appendix F Part 63 Subpart DDDD Table 10

Citation	Subject	Brief description	Applies to subpart DDDD?
§63.1	Applicability	Initial applicability determination; applicability after standard established; permit requirements; extensions, notifications	Yes.
§63.2	Definitions	Definitions for part 63 standards	Yes.
§63.3	Units and Abbreviations	Units and abbreviations for part 63 standards	Yes.
§63.4	Prohibited Activities	Prohibited activities; compliance date; circumvention, fragmentation	Yes.
§63.5	Construction/ Reconstruction	Applicability; applications; approvals	Yes.
§63.6(a)	Applicability	GP apply unless compliance extension; GP apply to area sources that become major	Yes.
§63.6(b)(5)	Notification	Must notify if commenced construction or reconstruction after proposal	Yes.
§63.6(b)(1)-(4)	Compliance Dates for New and Reconstructed Sources	Standards apply at effective date; 3 years after effective date; upon startup; 10 years after construction or reconstruction commences for section 112(f)	Yes.
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Area sources that become major must comply with major source standards immediately upon becoming major, regardless of whether required to comply when they were an area source	Compliance Dates for New and Reconstructed Area Sources that Become Major	Yes.
§63.6(c)(1)-(2)	Compliance Dates for Existing Sources	Comply according to date in subpart, which must be no later than 3 years after effective date; for section 112(f) standards, comply within 90 days of effective date unless compliance extension	Yes.
§63.6(c)(3)-(4)	[Reserved]		
§63.6(c)(5)	Compliance Dates for Existing Area Sources that Become Major	Area sources that become major must comply with major source standards by date indicated in subpart or by equivalent time period (e.g., 3 years)	Yes.
§63.6(d)	[Reserved]		

§63.6(e)(1)-(2)	Operation & Maintenance	Operate to minimize emissions at all times; correct malfunctions as soon as practicable; operation and maintenance requirements independently enforceable; information Administrator will use to determine if operation and maintenance requirements were met	Yes.
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan (SSMP)	Requirement for SSM and SSMP; content of SSMP	Yes.
§63.6(f)(1)	Compliance Except During SSM	You must comply with emission standards at all times except during SSM	Yes.
§63.6(f)(2)-(3)	Methods for Determining Compliance	Compliance based on performance test, operation and maintenance plans, records, inspection	Yes.
§63.6(g)(1)-(3)	Alternative Standard	Procedures for getting an alternative standard	Yes.
§63.6(h)(1)-(9)	Opacity/Visible Emission (VE) Standards	Requirements for opacity and visible emission standards	NA.
§63.6(i)(1)-(14)	Compliance Extension	Procedures and criteria for Administrator to grant compliance extension	Yes.
§63.6(i)(15)	[Reserved]		
§63.6(i)(16)	Compliance Extension	Compliance extension and Administrator's authority	Yes.
§63.6(j)	Presidential Compliance Exemption	President may exempt source category from requirement to comply with rule	Yes.
§63.7(a)(1)-(2)	Performance Test Dates	Dates for conducting initial performance testing and other compliance demonstrations; must conduct 180 days after first subject to rule	Yes.
§63.7(a)(3)	Section 114 Authority	Administrator may require a performance test under CAA section 114 at any time	Yes.
§63.7(b)(1)	Notification of Performance Test	Must notify Administrator 60 days before the test	Yes.
§63.7(b)(2)	Notification of Rescheduling	If have to reschedule performance test, must notify Administrator as soon as practicable	Yes.
§63.7(c)	Quality Assurance/Test Plan	Requirement to submit site-specific test plan 60 days before the test or on date Administrator agrees with; test plan approval procedures; performance audit requirements; internal and external QA procedures for testing	Yes.
§63.7(d)	Testing Facilities	Requirements for testing facilities	Yes.
§63.7(e)(1)	Conditions for Conducting Performance Tests	Performance tests must be conducted under representative conditions; cannot conduct performance tests during SSM; not a violation to exceed standard during SSM	Yes.
§63.7(e)(2)	Conditions for Conducting Performance Tests	Must conduct according to rule and EPA test methods unless Administrator approves alternative	Yes.

§63.7(e)(3)	Test Run Duration	Must have three test runs for at least the time specified in the relevant standard; compliance is based on arithmetic mean of three runs; specifies conditions when data from an additional test run can be used	Yes.
§63.7(f)	Alternative Test Method	Procedures by which Administrator can grant approval to use an alternative test method	Yes.
§63.7(g)	Performance Test Data Analysis	Must include raw data in performance test report; must submit performance test data 60 days after end of test with the notification of compliance status; keep data for 5 years	Yes.
§63.7(h)	Waiver of Tests	Procedures for Administrator to waive performance test	Yes.
§63.8(a)(1)	Applicability of Monitoring Requirements	Subject to all monitoring requirements in standard	Yes.
§63.8(a)(2)	Performance Specifications	Performance specifications in appendix B of part 60 apply	Yes.
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring with Flares	Requirements for flares in §63.11 apply	NA.
§63.8(b)(1)	Monitoring	Must conduct monitoring according to standard unless Administrator approves alternative	Yes.
§63.8(b)(2)-(3)	Multiple Effluents and Multiple Monitoring Systems	Specific requirements for installing monitoring systems; must install on each effluent before it is combined and before it is released to the atmosphere unless Administrator approves otherwise; if more than one monitoring system on an emission point, must report all monitoring system results, unless one monitoring system is a backup	Yes.
§63.8(c)(1)	Monitoring System Operation and Maintenance	Maintain monitoring system in a manner consistent with and good air pollution control practices	Yes.
§63.8(c)(1)(i)	Operation and Maintenance of CMS	Must maintain and operate CMS in accordance with §63.6(e)(1)	Yes.
§63.8(c)(1)(ii)	Spare Parts for CMS	Must maintain spare parts for routine CMS repairs	Yes.
§63.8(c)(1)(iii)	SSMP for CMS	Must develop and implement SSMP for CMS	Yes.
§63.8(c)(2)-(3)	Monitoring System Installation	Must install to get representative emission of parameter measurements; must verify operational status before or at performance test	Yes.

§63.8(c)(4)	Continuous Monitoring System (CMS) Requirements	CMS must be operating except during breakdown, out-of-control, repair, maintenance, and high-level calibration drifts; COMS must have a minimum of one cycle of sampling and analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period; CEMS must have a minimum of one cycle of operation for each successive 15-minute period	Yes.
§63.8(c)(5)	Continuous Opacity Monitoring System (COMS) Minimum Procedures	COMS minimum procedures	NA.
§63.8(c)(6)-(8)	CMS Requirements	Zero and high-level calibration check requirements; out-of-control periods	Yes.
§63.8(d)	CMS Quality Control	Requirements for CMS quality control, including calibration, etc.; must keep quality control plan on record for 5 years. Keep old versions for 5 years after revisions	Yes.
§63.8(e)	CMS Performance Evaluation	Notification, performance evaluation test plan, reports	Yes.
§63.8(f)(1)-(5)	Alternative Monitoring Method	Procedures for Administrator to approve alternative monitoring	Yes.
§63.8(f)(6)	Alternative to Relative Accuracy Test	Procedures for Administrator to approve alternative relative accuracy tests for CEMS	Yes.
§63.8(g)	Data Reduction	COMS 6-minute averages calculated over at least 36 evenly spaced data points; CEMS 1 hour averages computed over at least 4 equally spaced data points; data that can't be used in average; rounding of data	Yes.
§63.9(a)	Notification Requirements	Applicability and State delegation	Yes.
§63.9(b)(1)-(2)	Initial Notifications	Submit notification 120 days after effective date; contents of notification	Yes.
§63.9(b)(3)	[Reserved]		
§63.9(b)(4)-(5)	Initial Notifications	Submit notification 120 days after effective date; notification of intent to construct/reconstruct; notification of commencement of construct/reconstruct; notification of startup; contents of each	Yes.
§63.9(c)	Request for Compliance Extension	Can request if cannot comply by date or if installed best available control technology/ lowest achievable emission rate	Yes.
§63.9(d)	Notification of Special Compliance Requirements for New Source	For sources that commence construction between proposal and promulgation and want to comply 3 years after effective date	Yes.
§63.9(e)	Notification of Performance Test	Notify EPA Administrator 60 days prior	Yes.

§63.9(f)	Notification of Visible Emissions/Opacity Test	Notify EPA administrator 30 days prior	No.
§63.9(g)	Additional Notifications When Using CMS	Notification of performance evaluation; notification using COMS data; notification that exceeded criterion for relative accuracy	Yes.
§63.9(h)(1)-(6)	Notification of Compliance Status	Contents; due 60 days after end of performance test or other compliance demonstration, except for opacity/VE, which are due 30 days after; when to submit to Federal vs. State authority	Yes.
§63.9(i)	Adjustment of Submittal Deadlines	Procedures for Administrator to approve change in when notifications must be submitted	Yes.
§63.9(j)	Change in Previous Information	Must submit within 15 days after the change	Yes.
§63.10(a)	Recordkeeping/Reporting	Applies to all, unless compliance extension; when to submit to Federal vs. State authority; procedures for owners of more than one source	Yes.
§63.10(b)(1)	Recordkeeping/Reporting	General Requirements; keep all records readily available; keep for 5 years	Yes.
§63.10(b)(2)(i)-(iv)	Records Related to Startup, Shutdown, and Malfunction	Occurrence of each of operation (process equipment); occurrence of each malfunction of air pollution equipment; maintenance on air pollution control equipment; actions during startup, shutdown, and malfunction	Yes.
§63.10(b)(2)(vi) and (x)-(xi)	CMS Records	Malfunctions, inoperative, out-of-control	Yes.
§63.10(b)(2)(vii)-(ix)	Records	Measurements to demonstrate compliance with compliance options and operating requirements; performance test, performance evaluation, and visible emission observation results; measurements to determine conditions of performance tests and performance evaluations	Yes.
§63.10(b)(2)(xii)	Records	Records when under waiver	Yes.
§63.10(b)(2)(xiii)	Records	Records when using alternative to relative accuracy test	Yes.
§63.10(b)(2)(xiv)	Records	All documentation supporting initial notification and notification of compliance status	Yes.
§63.10(b)(3)	Records	Applicability determinations	Yes.
§63.10(c)(1)-(6), (9)-(15)	Records	Additional records for CMS	Yes.
§63.10(c)(7)-(8)	Records	Records of excess emissions and parameter monitoring exceedances for CMS	No.
§63.10(d)(1)	General Reporting Requirements	Requirement to report	Yes.

§63.10(d)(2)	Report of Performance Test Results	When to submit to Federal or State authority	Yes.
§63.10(d)(3)	Reporting Opacity or VE Observations	What to report and when	NA.
§63.10(d)(4)	Progress Reports	Must submit progress reports on schedule if under compliance extension	Yes.
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Contents and submission	Yes.
§63.10(e)(1)-(2)	Additional CMS Reports	Must report results for each CEM on a unit; written copy of performance evaluation; 3 copies of COMS performance evaluation	Yes.
§63.10(e)(3)	Reports	Excess emission reports	No.
§63.10(e)(4)	Reporting COMS data	Must submit COMS data with performance test data	NA.
§63.10(f)	Waiver for Recordkeeping/Reporting	Procedures for EPA Administrator to waive	Yes.
§63.11	Flares	Requirements for flares	NA.
§63.12	Delegation	State authority to enforce standards	Yes.
§63.13	Addresses	Addresses where reports, notifications, and requests are sent	Yes.
§63.14	Incorporation by Reference	Test methods incorporated by reference	Yes.
§63.15	Availability of Information	Public and confidential information	Yes.

August 22, 2007

Mr. Randy Reutzel
Site Manager
Ainsworth Engineered (USA) LLC - Bemidji
29647 US Highway 2 East
Bemidji, MN 56601

RE: Approval of Request for One-Year Extension of Compliance Deadline for the Plywood and Composite Wood Products Standard at 40 CFR § 63.2233(b)

Dear Mr. Reutzel:

On July 11, 2007 the Minnesota Pollution Control Agency (MPCA) received your written request for an extension to the compliance deadline in 40 CFR § 63.2233(b) for your Line 2 Press (also known as EU 130) at your Ainsworth Engineered (USA) LLC (Ainsworth) Bemidji oriented strandboard facility. Your extension request was prompted by the June 19, 2007, decision by the District of Columbia U.S. Circuit Court of Appeals that in part vacated the one year extension of the original compliance deadline for EU 130. The decision effectively changed the October 1, 2008, extended deadline back to the original October 1, 2007 deadline. Your July 11, 2007, request included a description of the controls to be installed to comply with the standard (an oxidizer will be installed on the Line 2 Press) and a proposed compliance schedule.

On July 23, 2007, Mr. Michael Twite of Ainsworth informed Marshall Cole of my staff during a telephone conversation that Ainsworth already possessed the oxidizer for Line 2 Press because the existing oxidizer on Line 1 dryers (that are shut down) will be moved to and utilized on the Line 2 Press. On August 2, 2007, Mr. Twite submitted information by electronic mail at the request of Mr. Cole to support the need for a full twelve month extension. Mr. Twite's submittal included the following supporting information and revised compliance schedule for oxidizer installation:

1. September 5, 2007 through approximately October 15, 2007: Site preparation and stub in of underground utilities (electrical and natural gas piping) concurrent with final concrete design based on soil conditions (pending receipt of written MPCA approval to construct based on MPCA review and approval of revised modeling submitted August 14, 2007).
2. October 15, 2007 through approximately November 30, 2007: Relocate Line 1 baghouse, and form/pour all required concrete for new oxidizer location at Line 2 Press site (November 30 is end of the site construction season for year 2007).

3. November 30, 2007 through approximately April 30, 2008: depending on weather conditions, dismantle oxidizer at it's current location, inspect and rebuild components as necessary, and start moving oxidizer components to the Line 2 Press site.
4. May 1, 2008 through approximately July 30, 2008: construct rebuilt oxidizer components at Line 2 press site, disassembly of existing oxidizer exhaust stack, relocate and reassemble stack at Line 2 Press site with large crane (subject to schedule impacts due to springtime road restrictions).
5. August 2008 conduct engineering tests and commissioning.
6. September 2008 oxidizer in service on Line 2 Press.

A certification by Todd Andre, Interim Bemidji Site Manager (a responsible Ainsworth official) was submitted electronically on August 10, 2007, and a hard copy was received on August 13, 2007 for this extension request.

Your extension request contains sufficient information for a determination to approve or deny your request. Based on the information provided, your extension request has been approved.

Please note the extension applies only to the installation of control equipment on the affected source, EU 130 Line 2 Press. Your extended compliance date is the earlier of October 1, 2008, or the date of completion of control equipment installation.

You shall meet the dates listed above for each of the six milestones in the compliance schedule submitted August 2, 2007. For dates identified only by month and year, you have until the last date of the month to complete the milestone. In addition, you shall conduct the initial performance test on the Line 2 Press oxidizer required by § 63.2260 to demonstrate compliance with Table 1B of part 63, subpart DDDD. Testing shall be conducted according to the requirements of § 63.2262 and table 4 of part 63, subpart DDDD. Testing shall be completed in the timeframe specified in § 63.2261 based on the extended compliance date granted in the preceding paragraph of this letter.

You shall furnish notification to the MPCA within 15 days after commencing construction (item 1 of the compliance schedule). You shall also furnish notification to the MPCA within 15 days after initial startup of the oxidizer (item 6 of the compliance schedule). Notifications shall identify the completed milestone and be sent to:

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

If you have questions please contact Marshall Cole at 507-280-2992.

Sincerely,

Don Smith, P.E.
Supervisor, Air Quality Permits Unit 2
St. Paul Office
Industrial Division

DS/CB:lao

cc: Pamela Blakley, U.S. Environmental Protection Agency
Michael Twite, Ainsworth Engineered (USA) LLC
Lori Bartels, Wenck (via electronic mail)
Ainars Silis, MPCA
Carolina Schutt, MPCA
Cary Hernandez, MPCA, Detroit Lakes Office
Marshall Cole, MPCA, Rochester Office
AQ File No. 30C

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 05700005-006

This technical support document is for all parties interested in the draft permit and meets the requirements of 40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1. This document provides the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2493)
Ainsworth Engineered (USA) L.L.C. Suite 3194 Bentall 4 1055 Dunsmuir Street, PO Box 49307 Vancouver, BC Canada V7X 1L3	29647 US Highway 2 East Bemidji, MN 56601 Hubbard County
Contact: Mr. Michael Twite Phone: (218) 327-3655	Contact address: 502 County Road 63 Grand Rapids, MN 55744

1.2. Facility Description

Ainsworth Engineered (USA) L.L.C. (Ainsworth or Permittee) owns and operates an Oriented Strandboard (OSB) manufacturing facility (Facility) in Hubbard County, Minnesota. The Facility is located approximately 10 miles southeast of Bemidji, Minnesota on U.S. Highway 2. The Facility was originally constructed and operated with two OSB manufacturing lines but recently shut down Line 1 dryers, press, and related wood-fired heating sources.

Logs are debarked and reduced to small strands, which are then dried, blended with a resin (such as phenol-formaldehyde) and wax mixture, formed into layers, and then pressed into wood panels.

The single operating OSB manufacturing line, known as Line 2, consists of three wood-strand triple pass green rotary dryers and one board press. The dryers and press are heated by a wood-fired thermal oil heater (Wellons Heat Source EU 108). The hot exhaust from the heater is passed by oil-filled tubes and the heated oil is used to heat the press. After heating the oil, the hot exhaust is routed to the three dryers for drying the wood wafers.

Line 2 dryers (including the wood-fired heater emissions) are controlled by wet electrostatic precipitators and a thermal oxidizer. Line 2 press emissions (primarily VOCs, phenol, and formaldehyde) are currently uncontrolled but will be controlled by September 2008 by the oxidizer formerly used on Line 1 dryers. Various handling, finishing, and forming processes are also part of Line 2. The Facility also has a wood-fired cogeneration boiler but it is not operated

at this time. Finally, the requirements of part 63, subpart DDDDD ‘Boiler MACT’ were removed by the previous permit (No. 05700005-005) due to vacatur of the rule by the D.C. Circuit Court of Appeals effective July 30, 2007.

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.

1.3 Description of the Activities Allowed by this Permit Action

This is an administrative amendment that changes the applicable compliance option from part 63 subpart DDDD for the GP 002 oxidizer. The existing permit contains compliance option 3 from Table 1B of subpart DDDD that requires a methanol emissions reduction of 90%. This amendment changes the compliance determination option to option 2 in Table 1B which is the limitation of total HAP, measured as THC (carbon) to 20 ppmvd.

This change is made as an administrative amendment as provided for at Minn. R. 7007.1400, subp. 1.F. This rule allows the incorporation of standards adopted under Code of Federal Regulations, title 40, part 63, as amended, into a permit by the administrative amendment process.

The existing methanol reduction requirements were removed as provided for at Minn. R. 7007.1400, subp. 1.D.(3) because the methanol removal efficiency requirements were redundant upon the addition of the total HAP requirements to the permit.

No emissions changes or modifications are authorized by this permit action.

3. Conclusion

Based on the information provided by Ainsworth Engineered (USA) L.L.C., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05700005-006 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: Marshall Cole (permit writer/engineer)
 Cary Hernandez (enforcement)
 Peggy Bartz (peer reviewer)

AQ File No. 30C; DQ #1946

Attachments: Revised CD-01 Forms for GP 002 (italicized changes gray shading)



COMPLIANCE PLAN CD-01

Facility Name: Ainsworth Engineered (USA) LLC - Bemidji
 Permit Number: 05700005 - 006

Subject Item: GP 002 Line 2 Rotary Dryers #5, #6, & #7

Associated Items: CE 046 Wet Electrostatic Precipitator

- CE 047 Wet Electrostatic Precipitator
- CE 048 Wet Electrostatic Precipitator
- CE 049 Thermal Oxidizer
- EU 019 Green Rotary Dryer #5
- EU 020 Green Rotary Dryer #6
- EU 021 Green Rotary Dryer #7
- EU 108 Wellons Heat Source
- SV 002 Line 2 Green Rotary Dryers #5, #6, & #7
- SV 017 Line 2 Dryer Wellons Heat Source Bypass

	NC/CA	Type	Citation	Requirement
1.0		CD	hdr	LIMITS AND OPERATING REQUIREMENTS
2.0		CD	40 CFR Sections 63.2232 and 63.2233(b)	GP 002 emission units are process included in the definition of an existing affected source as defined in the Plywood and Composite Wood Products MACT Standard at Section 63.2232. The Permittee must comply with the applicable compliance options, operating requirements, and work practice requirements found in 40 CFR part 63 subpart DDDD for all GP 002 emission units no later than the compliance date of October 1, 2007.
3.0		LIMIT	40 CFR 63.2240(b); part 63 subpart DDDD Table 1B Option 2	HAPs - Total: less than or equal to 20 parts per million by volume, dry, measured as total hydrocarbons (carbon).
4.0		LIMIT	Minn. Stat. 116.07, subd. 4a	Total Particulate Matter: less than or equal to 12 lbs/hour for SV 002. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.
5.0		LIMIT	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000	Total Particulate Matter: less than or equal to 0.86 lbs/ton of oven dried product.
6.0		LIMIT	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000	Particulate Matter < 10 micron: less than or equal to 12 lbs/hour
7.0		LIMIT	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000	Particulate Matter < 10 micron: less than or equal to 0.77 lbs/ton of oven dried product.
8.0		LIMIT	Minn. R. 7011.0610, subp. 1(A)(2)	Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.
9.0		LIMIT	Minn. Stat. 116.07, subd. 4a	Volatile Organic Compounds: less than or equal to 13.0 lbs/hour measured as carbon 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.
10.0		LIMIT	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000	Volatile Organic Compounds: less than or equal to 0.44 lbs/ton of oven dried product. VOC shall be measured as carbon by Method 25 or 25A or by an alternate or equivalent method approved by the agency.
11.0		LIMIT	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000	Carbon Monoxide: less than or equal to 30.0 lbs/hour
12.0		LIMIT	Title I Condition: 40 CFR Section 52.21(j) (BACT); Minn. R. 7007.3000	Carbon Monoxide: less than or equal to 1.8 lbs/ton of oven dried product.
13.0		LIMIT	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000	Nitrogen Oxides: less than or equal to 54.0 lbs/hour
14.0		LIMIT	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



Facility Name: Ainsworth Engineered (USA) LLC - Bemidji

Permit Number: 05700005 - 006

46.0		S/A	Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1	Performance Test: due before 07/13/2011 to determine SV 002 Total Particulate Matter, Particulate Matter less than 10 microns, and Nitrogen Oxide emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.
47.0		S/A	Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1	Performance Test: due before 11/15/2009 to determine SV 002 Carbon Monoxide emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.
48.0		S/A	Title I Condition: Monitoring for BACT limits and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1	Performance Test: due before 11/15/2011 to determine SV 002 Volatile Organic Compound emissions. Testing shall be performed while combusting manufacturing residue at the permitted maximum rate of 1% by weight of the total fuel input in EU 108.
49.0		S/A	Minn. R. 7017.2020, subp. 1	Performance Test: due before 06/08/2010 to measure SV 002 opacity.
50.0		S/A	40 CFR Sections 63.2260(a) and 63.2261(a)	Initial Performance Test: due 180 days after 10/01/2007 to demonstrate initial compliance for total HAP emissions. To demonstrate initial compliance with the compliance options and operating requirements, the Permittee must conduct performance tests and establish each site-specific operating requirement in Table 2 of subpart DDDD according to the requirements in Section 63.2262 and Table 4 of subpart DDDD.
51.0		CD	40 CFR Section 63.2262(a) and part 63 subpart DDDD Table 4 items (1) - (4), (7), (9), and (10)	Performance Testing: conduct each performance test used to determine compliance with the applicable limit in part 63 subpart DDDD Table 1B, according to the requirements in Section 63.7(e)(1), the requirements in paragraphs (b) through (l) of Section 63.2262, and according to the applicable methods specified in Table 4 of part 63 subpart DDDD.
52.0		CD	40 CFR Part 63 subpart DDDD table 5 item (3)	Compliance Demonstration: Compliance has been demonstrated for average total HAP emissions if: (3) The average total HAP emissions, measured using the methods in Table 4 to subpart DDDD over the 3-hour performance test, do not exceed 20 ppmvd; AND the Permittee has a record of the oxidizer temperatures as required by Table 2 of subpart DDDD over the performance test during which average total HAP emissions did not exceed 20 ppmvd.
53.0		S/A	Minn. R. 7017.2020, subp. 1	Testing Frequency Plan: due 60 days after Performance Test for Total Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds, and opacity. The plan shall specify a testing frequency based on variability of individual test run results, contrast between test results and emission factors used in projected actual emission calculations, and the margin between actual facility emission increases and 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 plan by the MPCA.
54.0		S/A	Minn. R. 7017.2020, subp. 1	Testing Frequency Plan: due 60 days after Initial Performance Test for GP 002 (CE 049/SV 002) methanol removal efficiency. The plan shall propose a testing frequency based on the test results and MPCA guidance. Future performance tests at 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the plan by the MPCA.
55.0		CD	hdr	RECORDKEEPING
56.0		CD	Title I Condition: To avoid major modification classification for NOx under 40 CFR Section 52.21 and Minn. R. 7007.3000	EU 108 Natural Gas Usage and Heat Input Recordkeeping: Once each day the Permittee shall calculate, record, and maintain a record of the following: 1. EU 108 natural gas usage for the previous calendar day (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 press during startup); 2. EU 108 total natural gas usage for the previous 365 days (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 press during startup) to determine the 365-day rolling sum; 3. EU 108 total heat input for the previous 365 days from natural gas (when combustion emissions were vented through SV 017 and bypassed air pollution control equipment during preheating of the thermal oil system and Line 2 press during startup), by converting cubic feet of natural gas to Btu at a rate of 1020 Btu/cubic foot.