

Collins Pine Co. Title V Compliance Evaluation

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COMPLIANCE WITH FEDERALLY ENFORCEABLE DISTRICT RULES

APPLICABLE FEDERALLY ENFORCEABLE DISTRICT RULES

RULE 202 Visible Emissions

Rule Description

This rule provides a method of visually evaluation emission levels. A person shall not discharge into the atmosphere from any single source of emissions any air contaminant for a period or periods aggregating more than 3 minutes in any hour which is as dark or darker in shade or obscures an observer's view to a degree equal to or greater than that designated as No. 2 on the Ringelmann Chart.

Compliance Status

Collins Pine Co. is currently in compliance with this requirement.

RULE 205 Nuisance

Rule Description

This rule prohibits the discharge of any air contaminant that causes nuisance, discomfort or annoyance to the public, business or property.

Compliance Status

Collins Pine Co. is substantially in compliance with this Rule.

RULE 207 Particulate Matter

Rule Description

Discharge into the atmosphere from any source or single processing unit, exclusive of sources emitting combustion contaminants only, particulate matter emissions in excess of 0.1 grains per cubic foot of gas is prohibited.

Compliance status

Collins Pine Co. is in compliance with this requirement.

RULE 210 Specific Contaminants

Rule Description

Maximum SO emissions limited to 2000 ppmv; combustion contaminants <0.2 gr/dscf for wood fired boilers.

COMPLIANCE STATUS

Collins Pine Co. is in compliance with this requirement.

RULES 210 & 211 Process Weight

Rule Description

A person shall not discharge into the atmosphere in any one hour from any source whatsoever solid particulate matter in excess of the amount shown in the process weight table or in the interpolation equation. The provisions of the Rule do not apply to combustion equipment, which derives at least 80% of its fuel input heat content from wood or wood associated waste.

$$E = 3.59P^{**0.62} \text{ (for } P < 30 \text{ tons/hr)}$$

Where:

E = Emission in pounds per hour

P = Process weight rate in tons per hour

Compliance Status

This rule allows approx. 30 lbs/hr of PM based on a fuel feed rate of 252,000 tons/yr. Actual emissions are 9 lbs/hr. Therefore, Collins Pine Co. is in compliance with this requirement.

RULE 213 Storage of Gasoline Products

Rule Description

Requires the installation of a submerged fill pipe for gasoline tanks 250 gallons or more in size.

Compliance Status

This Rule may not be applicable to Collins Pine Co. Need to confirm if they have any gasoline tanks on-site.

RULE 225 Compliance Testing

Rule Description

Except as otherwise stated in these rules and regulations, performance tests undertaken to determine compliance of sources with Regulation II shall comply with the provisions of CFR 40, Part 60, Appendix A except that Method 5 shall be modified to include the impinger train catch.

Compliance Status

Collins Pine Co. is in compliance with this requirement. This condition is incorporated into the PSD and the facility's permit to operate.

COMPLIANCE WITH FEDERAL NSPS REQUIREMENTS

FEDERAL NEW SOURCE PERFORMANCE REQUIREMENTS

NSPS Part 60 subpart Db section 60.43bc)(1)

Rule Description

PM not exceed .1 lbs/million BTU heat input. Current permit limits emissions to 14.90 hrs/hr which is equivalent TO 0.061 lbs/mmmbtu.

Compliance Status

Collins Pine Co. is in compliance with this requirement.

NSPS Part 60 subpart Db section 60.43b(f)

Rule Description

Visible emissions limit to 20% for no more than 6 minutes.

Compliance Status

Collins Pine Co. is in compliance with this requirement. District rules limit opacity to 20% for no more than 3 minutes.

NSPS Part 60 subpart Db section 60.44b(d)

Rule Description

NOx not to exceed .3 lbs/million BTU heat input

Compliance Status

Collins Pine Co. is in compliance with this requirement. Current permits limits Nox to 55.0 lbs/hr which is equivalent to 0.22 lbs/MMBTU.

NSPS Part 60 subpart Db section 60.46b(a)

Rule Description

PM and opacity standards apply except during startup, shutdown, or malfunction

Compliance Status

Collins Pine Co. is in compliance with this requirement. This condition is contained in current permits.

NSPS Part 60 subpart Db section 60.46b(b)

Rule Description

PM compliance determined by performance testing

Compliance Status

Collins Pine Co. is in compliance with this requirement. This condition is contained in current PSD permit and District PTO.

NSPS Part 60 subpart Db section 60.46b(d)

Rule Description

PM and opacity standards apply except during startup, shutdown, or malfunction

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits.

NSPS Part 60 subpart Db Section 60.48b(3)

Rule Description

Install, operate and maintain continuous opacity monitors

Compliance Status

Collins Pine Co. is in compliance with this requirement. Collins Pine Co. has CEMS installed

NSPS Part 60 subpart Db section 60.48b(e)(1)

Rule Description

Span value between 60 and 80 percent of full range

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits.

NSPS Part 60 subpart Db section 60.49b(d)

Rule Description

Record and Maintain records of fuel combusted

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 subpart Db section 60.49(f)

Rule Description

PM and opacity standards apply except during startup, shutdown or malfunction

Compliance Status

Collins Pine Co. is in compliance with this requirement.

NSPS Part 60 subpart Db section 60.49(h)

Rule Description

Record and maintain records of opacity

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.7(a)(4)

Rule Description

Notification of change of existing facility resulting in emissions increase unless exempt

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.7(b)**Rule Descriptions**

Maintain records of start-ups, shutdowns, and breakdowns.

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.7(c)**Rule Description**

Submit excess emissions and monitoring system performance reports semi-annually

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.47(d)**Rule Description**

Summary report information requirements

Compliance Status

Collins Pine co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.47(f)**Rule Description**

Maintain records for 2 years

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.48(d)**Rule Description**

Provide 30 day notification of performance test

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.8(e)

Rule Description

Provide performance test facilities

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.11(b)

Rule Description

Compliance with opacity determined by reference method #9 or alternative method or COMS

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.11(d)

Rule Description

Maintain and operate the facility consistent with good air pollution control practices to minimize emissions at all times

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits

NSPS Part 60 Section 60.12

Rule Description

No Circumvention

Compliance Status

Collins Pine Co. is in compliance with this requirement, Required by current permits

NSPS Part 60 Section 60.13

Rule Description

COMS conform to design and quality assurance requirements specified in this section and appendix B.

Compliance Status

Collins Pine Co. is in compliance with this requirement. Required by current permits.

**COMPLIANCE WITH MISC. FEDERAL
REQUIREMENTS
MISC. FEDERAL REQUIREMENTS**

PSD (40 CFR 52.21)

The facility has been issued a PSD permit. The current operating permit incorporates PSD permit conditions.

Ozone Depleting Chemicals (40 XCFR 82.161)

This requirement, while part of Title V permit program, is not applicable to Collins Pine Co. since it does not use any CFCs, halons, carbon tetrachloride or methyl chloroform

Risk Management Plans (40 CFR 68)

Collins Pine Co. would be subject to this requirement. Confirm that an RMP was submitted to the local emergency coordinator.

Acid Rain (40 CFR 72 to 78)

This facility is not subject to this requirement since it's primary fuel is wood not fossil fuels.

General Title V Permit Conditions

GENERAL TITLE V PERMIT CONDITIONS

A. Permit Life/ Term

This Permit to Operate shall become invalid five years from the time of issuance. The permittee shall apply for renewal of this permit no earlier than 18 months before the date of expiration nor later than 6 months before the date of expiration. [Rule 522, Federal Operating Permits Program §402]

B. Payment of Fees

The Permittee shall remit the Title V supplemental annual fee in a timely basis. Failure of remitting fees in a timely basis shall result in the forfeiture of this Permit to Operate. Operation without a permit subjects the source to potential enforcement action by the District and the U.S.EPA pursuant to § 502(a) of the Clean Air Act. [Rule 522, Federal Operating Permits Program, §403]

C. Right of Entry

The Regional Administrator, The Executive Officer of the California air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted:

1. To enter upon the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Permit to Operate; and
2. At reasonable times to have access to, inspect and copy and records required to be kept under the terms and conditions of this Permit to Operate; and

3. To inspect any equipment at the stationary source, operation, work practices, emission-related activities or method required in this Permit to Operate; and
4. To sample emissions from the source or other monitoring activities. [PSD permit issued under the authority of 40 CFR Part 52; Rule 522, Federal Operating Permits Program, §402.2]

D. Severability

The Provisions of this Permit to Operate are able, and, if any provision of this Permit to Operate is held invalid, the remainder of this Permit to Operate shall not be affected thereby. [PSD permit issued under the authority of 40 CFR Part 52; Rule 522, Federal Operating Permits Program, §402.2]

A. Need to Halt or Reduce Activity Not A Defense

The permittee shall not use the “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition. [Rule 522, Federal Operating Permits Program, §402.2 k.4]

B. Modification, Revocation, Reopening for Cause

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any permit condition. [Rule 522, Federal Operating Permits Program, §402.2. k.56, 40 CFR 70.6(a)(6)(i)]

C. Information and Records Submitted

Within a reasonable time period, the permittee shall furnish any information requested by the air pollution control officer (APCO) of Northern Sierra Air Quality Management District, in writing, for the purpose of determining:

Compliance with the permit, or

2. Whether or not cause exists for a permit or enforcement action [Rule 522, Federal Operating Permits Program §402]

D. Compliance

The permittee shall comply with provisions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial for a permit renewal application. [Rule 522, Federal Operating Permits Program, §402.2 K.3, 40 CFR 70.6(a)(6)(iii)]

E. Property Rights

- 3) This permit does not convey property rights or exclusive privilege of any sort. [Rule 522 Federal Operating Permits Program, §402]

F. Duty to Apply for Renewal

The permittee shall apply for renewal of this permit no earlier than 18 months before the date of expiration nor later than 6 months before the date of expiration. [Rule 522, Federal Operating Permits Program, §402.2]

G. Facilities Operation

At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extend practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d), NSR permits]

H. Emergency Provisions

The permittee shall comply with the requirements of Rule 404, Upset Conditions, Breakdown and Scheduled maintenance. [Rule 522, Federal Operating Permits Program, §402]

3. Definition. An “emergency” is any situation arising from a sudden and reasonably unforeseeable event beyond the control of a permittee (e.g., an act of God) which causes the exceedance of a technology-based emission limitation under a permit and requires immediate corrective action to restore compliance. An “emergency” shall not include noncompliance as a result of improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error [Rule 522 §212, 40 CFR 70.6(g)(1)]
4. Effect of an emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the reporting requirements of condition VI.A.2 of this permit are met. [40 CFR 70.6(g)(2)]
5. The affirmative defense of emergency shall be demonstrated through property signed, contemporaneous operating logs, or other relevant evidence that:
 - a. The permittee shall comply with the requirements of Rule 516, UPSET CONDITIONS, BREAKDOWN AND SCHEDULED MAINTENANCE, and the emergency provisions contained in all applicable federal requirements and
 - b. Within two weeks of an emergency event, the responsible official submits to the District a properly signed, contemporaneous log or other relevant evidence which demonstrates that:

An emergency occurred;

The permitted can identify the cause(s) of the emergency; and
The facility was being properly operated at the time of the emergency;

and

All steps were taken to minimize the emissions resulting from the

emergency; and

(v) Within two working days of the emergency event, the permittee provided the district with a description of the emergency and any mitigating or corrective actions taken; and

4. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred.