



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5352-00007/00023**

**Renewal Number: 3**

**10/19/2015**

**Facility Identification Data**

Name: COMMONWEALTH PLYWOOD INC

Address: 10068 US RTE 4

WHITEHALL, NY 12887

**Owner/Firm**

Name: COMMONWEALTH PLYWOOD INC

Address: 15 LABELLE BLVD

PO BOX 90

STE-THERESE, QC J7E 4H9, CAN

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

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232 GOLF COURSE RD

WARRENSBURG, NY 12885

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Air Permitting Contact:

Name: CHRISTIAN NOEL

Address: COMMONWEALTH PLYWOOD INC

PO BOX 30

WHITEHALL, NY 12887

Phone:

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

This is a Renewal application only. There are no modifications to the existing Title V Permit. They have updated their VOC RACT analyses which continues to conclude that any effective control would cost



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more than required under RACT. This Source Specific VOC RACT analysis has been sent to EPA for their review and approval.

**Attainment Status**

COMMONWEALTH PLYWOOD INC is located in the town of WHITEHALL in the county of WASHINGTON.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor.

**Facility Description:**

Commonwealth Plywood produces softwood and hardwood plywood panels. Veneers are peeled from rough cut logs and dried in a direct fired veneer dryer. Veneers that do not meet the moisture specification are re-dried in an indirect fired veneer dryer. The facility also purchases dried hardwood veneers. The dried veneers are assembled using a heat-set resin, and processed in the glue press to form plywood cores or panels. The plywood panels are then trimmed and sanded to 4' X 8' sheets of various thicknesses and grades.

**Permit Structure and Description of Operations**

The Title V permit for COMMONWEALTH PLYWOOD INC

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types: combustion - devices which burn fuel to generate heat, steam or power



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incinerator - devices which burn waste material for disposal  
control - emission control devices  
process - any device or contrivance which may emit air contaminants  
that is not included in the above categories.

COMMONWEALTH PLYWOOD INC is defined by the following emission unit(s):

Emission unit 101997 - This emission unit includes direct-fired and indirect-fired veneer dryers and the 25-million Btu/hr wood-fired fuel cell. The fuel cell provides hot air for the direct-fired veneer drying process. The direct-fired veneer dryer is the exhaust for the fuel cell.

Emission unit 101997 is associated with the following emission points (EP):  
00004, 00005, 0003A, 0003B, 0020A, 0020B, 0020C, 0021A, 0021B, EF001, EF002, EF003, EF004  
Process: 260 is located at Building A - Mixed species veneers, including poplar and pine, of varying thicknesses and grades are dried to specified moisture contents in an indirect-fired dryer using process steam.

Process: 261 is located at Main, Building A - Mixed species veneers, including poplar and pine, of varying thicknesses and grades are dried to specified moisture contents in a direct-fired dryer that is provided with hot air from a wood-fired fuel cell.

Emission unit 131997 - This emission unit includes the equipment used for storage and mixing of resins applied to veneers in the plywood press. these sources include the 2-compartment resin storage tank and the resin mix station. The storage tank compartments include conservation vents, which discharge within the building. The mix station includes a canopy hood and is vented to Emission Point 00019

Emission unit 131997 is associated with the following emission points (EP):  
00019

Process: 268 is located at Main, Building A - This process consists of the preparation and storage of PF resin to be applied to veneers in the glue press plus the storage of caustic.

Process: 269 is located at Main, Building A - This process consists of the storage of urea-formaldehyde resin to be applied to veneers prior to pressing.

Emission unit 111997 - This emission unit includes a 16-million Btu/hr wood fired boiler, a 20-million Btu/hr propane-fired boiler, a log kiln, and a plywood press. The wood-fired boiler provides process steam for the log kiln and the glue press. The propane boiler is used as a back-up to the wood-fired boiler. Emissions from the plywood press are vented inside the mill.

Emission unit 111997 is associated with the following emission points (EP):  
00007, 00015

Process: 262 is located at MAIN, Building A - The 20.9 MMBTU/hr propane backup boiler is used to provide process steam when the Wellons Boiler is unavailable.

Process: 263 is located at Main, Building A - Logs are heated in the Log Kiln, a non-point source, using steam from the wood-fired or propane-fired boilers.



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Process: 264 is located at MAIN, Building A - Dried veneers are glued together in the plywood press using phenol-or urea-formaldehyde resin and process steam.

Process: 265 is located at MAIN, Building A - Wood residue is combusted in the 16-mmBTU/hr Wellons boiler to produce process steam.

Emission unit 121997 - This emission unit includes the equipment used for trimming the veneer and trimming and sanding the plywood panels, including the veneer clipper, trim saw, hogger, and sander. Veneer and plywood trimmings are conveyed to the hogger, and the hogged wood residue is directed to either the dry bin, via a cyclone, or to the dry silo to be used as fuel. Sander dust is captured and directed to the baghouse.

Emission unit 121997 is associated with the following emission points (EP):

00001, 00016, 00018

Process: 266 is located at MAIN, Building A - The plywood is sanded prior to distribution. Sander dust is captured and directed to the baghouse.

Process: 267 is located at MAIN, Building A - Veneer and plywood trimmings are captured and conveyed to the hogger. Hogged wood is conveyed to either the Dry Bin via Cyclone #1, or the the dry Silo.

**Title V/Major Source Status**

COMMONWEALTH PLYWOOD INC is subject to Title V requirements. This determination is based on the following information:

This facility is major for:

PM at > 100 and < 250 tpy,  
VOC at > 50 and < 100 tpy, and  
CO which is capped at < 225 tpy

**Program Applicability**

The following chart summarizes the applicability of COMMONWEALTH PLYWOOD INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO

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TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

**PSD** Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS** New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV Acid Rain Control Program (40 CFR 72 thru 78)** - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G)** - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

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SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis

of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

**SIC Code**

**Description**

2421	SAWMILLS & PLANING MILLS GENERAL
2435	HARDWOOD VENEER AND PLYWOOD
2436	SOFTWOOD VENEER AND PLYWOOD

**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

**SCC Code**

**Description**

1-02-009-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE
1-02-010-02	Wood/Bark-Fired Boiler (> 50,000 LB STM) EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - LIQUEFIED PETROLEUM GAS (LPG)
3-07-007-02	Propane PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS
3-07-007-10	Sanding Operations PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS
3-07-007-16	PULP & PAPER AND WOOD PRODUCTS: PLYWOOD/PARTICLEBOARD OPERATIONS: SAWING
3-07-007-30	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS POPLAR WOOD FIRED VENEER DRYER PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD

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3-07-007-69	OPERATIONS WOOD PRODUCTS: PLYWOOD/PARTICLE BOARD OPERATIONS: WOOD STEAMING PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS Plywood Operations - Indirect Heated Dryer: Poplar Veneer
3-07-007-81	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PLYWOOD/PARTICLEBOARD OPERATIONS Plywood Operations - Plywood Press: Urea- Formaldehyde Resin
3-14-015-03	TRANSPORTATION EQUIPMENT TRANSPORTATION EQUIPMENT - BOAT MANUFACTURING RESIN STORAGE

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
035822-46-9	1,2,3,4,6,7,8- HEPTACHLORODIBENZODI OXIN		> 0 but < 2.5 tpy
067562-39-4	1,2,3,4,6,7,8- HEPTACHLORODIBENZOF URAN		> 0 but < 2.5 tpy
057117-44-9	1,2,3,6,7,8- HEXACHLORODIBENZOFU RAN		> 0 but < 2.5 tpy
057653-85-7	1,2,3,6,7,8- HEXACHLORODIBENZO-P- DIOXIN		> 0 but < 2.5 tpy
000098-86-2	1-PHENYLETHANONE		> 0 but < 10 tpy
051207-31-9	2,3,7,8- TETRACHLORODIBENZOF URAN		> 0 but < 10 tpy
001746-01-6	2,3,7,8-		> 0 but < 10 tpy

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	TETRACHLORODIBENZO- P-DIOXIN		
000051-28-5	2,4, DINITROPHENOL		> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL		> 0 but < 10 tpy
000091-57-6	2-METHYL NAPHTHALENE		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000056-49-5	3- METHYLCHOLANTHRENE		> 0 but < 2.5 tpy
000057-97-6	7,12- DIMETHYLBENZ[A]ANTHR ACENE		> 0 but < 10 tpy
000083-32-9	ACENAPHTHENE		> 0 but < 10 tpy
000208-96-8	ACENAPHTHYLENE		> 0 but < 2.5 tpy
000075-07-0	ACETALDEHYDE		> 0 but < 10 tpy
000107-02-8	ACROLEIN		> 0 but < 10 tpy
000120-12-7	ANTHRACENE		> 0 but < 10 tpy
007440-36-0	ANTIMONY		> 0 but < 10 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000095-47-6	BENZENE, 1,2-DIMETHYL		> 0 but < 10 tpy
000056-55-3	BENZO(A)ANTHRACENE		> 0 but < 10 tpy
000050-32-8	BENZO(A)PYRENE		> 0 but < 10 tpy
000205-99-2	BENZO[B]FLUORANTHENE		> 0 but < 10 tpy
000191-24-2	BENZO[G,H,I]PERYLENE		> 0 but < 10 tpy
000207-08-9	BENZO[K]FLUORANTHENE		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
000127-91-3	BETA-PINENE		>= 10 tpy but < 25 tpy
000080-56-8	BICYCLO(3.1.1)HEPT-2- ENE, 2,6,6-TRIMETHYL C10H16		>= 25 tpy but < 40 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE	450000	
000056-23-5	CARBON TETRACHLORIDE		> 0 but < 10 tpy
007782-50-5	CHLORINE		> 0 but < 10 tpy
000108-90-7	CHLOROBENZENE		> 0 but < 10 tpy
000067-66-3	CHLOROFORM		> 0 but < 10 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
000218-01-9	CHRYSENE		> 0 but < 10 tpy
007440-48-4	COBALT		> 0 but < 10 tpy
004170-30-3	CROTONALDEHYDE		> 0 but < 2.5 tpy
000053-70-3	DIBENZ[A,H]ANTHRACENE		> 0 but < 10 tpy
025321-22-6	DICHLOROBENZENE		> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE		> 0 but < 10 tpy
000067-64-1	DIMETHYL KETONE		> 0 but < 2.5 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
000206-44-0	FLUORANTHENE		> 0 but < 10 tpy
000086-73-7	FLUORENE		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
000110-54-3	HEXANE		> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE		> 0 but < 10 tpy
000193-39-5	INDENO[1,2,3-CD]PYRENE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-96-5	MANGANESE		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL		> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE		> 0 but < 10 tpy
000091-20-3	NAPHTHALENE		> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
039001-02-0	OCTACHLORODIBENZOFU RANS, TOTAL		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 10 tpy but < 25 tpy



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000100-02-7	PARA-NITROPHENOL	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	>= 100 tpy but < 250 tpy
036088-22-9	PENTACHLORODIBENZODI OXIN	> 0 but < 2.5 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 tpy
000085-01-8	PHENANTHRENE	> 0 but < 10 tpy
000108-95-2	PHENOL	> 0 but < 10 tpy
000087-86-5	PHENOL, PENTACHLORO	> 0 but < 10 tpy
0NY075-02-5	PM 2.5	>= 100 tpy but < 250 tpy
0NY075-00-5	PM-10	>= 100 tpy but < 250 tpy
000000-62-4	POLYCHLORINATED DIBENZOFURANS, TOTAL	> 0 but < 2.5 tpy
000123-38-6	PROPIONALDEHYDE	> 0 but < 10 tpy
000129-00-0	PYRENE	> 0 but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
000100-42-5	STYRENE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 2.5 tpy but < 10 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP	>= 10 tpy but < 25 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 25 tpy but < 40 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any

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applicable requirement.

**Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**

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 reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

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**Permit ID: 5-5352-00007/00023**

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**Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same



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procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item L: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Regulatory Analysis**

Location	Regulation	Condition	Short Description
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**Facility/EU/EP/Process/ES**

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FACILITY	ECL 19-0301	39	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21(j) (2)	24, 25	Best Available Control Technology (BACT) (see narrative)
FACILITY	40CFR 63-JJJJJJ	32, 33	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers
FACILITY	40CFR 68	19	Area Sources
FACILITY	40CFR 82-F	20	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	10	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	40	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	11	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	12	Recycling and Salvage
FACILITY	6NYCRR 201-3.2(a)	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 34, 35	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(d)(4)	22	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22	Compliance Schedules



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FACILITY	6NYCRR 201-6.4 (e)	6	- Progress Reports
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Compliance
FACILITY	6NYCRR 201-7	23, 24, 25	Certification
FACILITY	6NYCRR 202-1.1	18	Off Permit Changes
FACILITY	6NYCRR 202-2.1	7	Federally Enforceable
FACILITY	6NYCRR 202-2.5	8	Emissions Caps
FACILITY	6NYCRR 211.1	26	Required emissions tests.
FACILITY	6NYCRR 211.2	41	Emission Statements - Applicability
FACILITY	6NYCRR 212.10 (c) (4) (iii)	31	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 212.4 (c)	27	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.6 (a)	28, 29	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212.9 (b)	30	General Process Emission Sources - NOx and VOC RACT required at major facilities
FACILITY	6NYCRR 215.2	9	General Process Emission Sources - emissions from new processes and/or modifications
1-11997/00015	6NYCRR 227-1.2 (a) (4)	37	General Process Emission Sources - opacity of emissions limited
1-11997/00007	6NYCRR 227-1.3 (a)	36	General Process Emission Sources - tables
1-11997/00015	6NYCRR 227-1.3 (a)	38	Open Fires - Prohibitions
			Particulate Emissions
			Firing Solid Fuels.
			Smoke Emission
			Limitations.
			Smoke Emission
			Limitations.

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and



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repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)



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This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the





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statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, COMMONWEALTH PLYWOOD INC has been determined to be subject to the following regulations:

40 CFR 52.21 (j) (2)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the **special** permit conditions, separately by the permit reviewer.

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.



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6 NYCRR 212.10 (c) (4) (iii)

This section allows source owners who cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the Department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the Department.

6 NYCRR 212.4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 212.9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6 NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

**Compliance Certification**

**Summary of monitoring activities at COMMONWEALTH PLYWOOD INC:**

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring



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FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	27	intermittent emission testing
FACILITY	28	intermittent emission testing
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	work practice involving specific operations
1-11997/00015	37	intermittent emission testing
1-11997/00007	36	intermittent emission testing
1-11997/00015	38	monitoring of process or control device parameters as surrogate

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**Basis for Monitoring**

Condition 23 - Facility cap on emissions of carbon monoxide (CO). This cap is set at 10% less than the PSD applicability level in order to assure that it is not exceeded.

Condition 24 - This monitoring condition details how emissions of CO are calculated from each of the affected sources at this facility.

Condition 25 - This monitoring condition is different from condition #24 in that it requires an annual stack test of the direct fired boiler and that no bark be burned in this unit.

Condition 27 - This monitoring condition has been included to address particulate emission requirements of Part 212 for process sources. Stack testing will verify compliance with this requirement. The rule does not specify any monitoring frequency. Since, opacity is monitored daily and is related to particulate emissions this will give the Department indication when stack testing is necessary. Therefore, monitoring at the Department's discretion is justified.

Condition 28 - This monitoring condition has been included to address the visible emissions requirements of Part 212 for process sources. This emission unit includes a 25 MMBtu wood waste fuel cell which is used to produce heat for the veneer dryers. The daily monitoring frequency is justified due to the highly variable nature of opacity emissions from this source. This monitoring condition requires if any visible emissions other than steam are noted, a Method 9 visible emissions observation is to be conducted within two days. If the opacity limit is contravened, it shall be reported to the Department within one business day along with corrective action or a compliance schedule to assure compliance.

Condition 29 - These monitoring conditions have been included to address the visible emissions requirements of Part 212 for process sources. Performance of Visible Emissions Observations (Method 9) will verify compliance with this requirement. The rule does not specify any monitoring frequency. Since, it is unlikely there will be any visible emissions of any magnitude from this zone, monitoring at Department's discretion is justified

Condition 30 – This is a limit on the hours of operation per year for the Plymac indirect drier. This limit assures the facility wide annual emissions of formaldehyde and acetaldehyde do not exceed Air Guide-1 acceptable levels.



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Condition 31 - This condition requires the company to reevaluate, once per permit term, their analyses which indicates that no control is reasonably cost effective at this time. This analyses has been submitted to EPA for their review and approval as a SIP revision.

Condition 32 & 33 – Indicates that the facility is an area source for HAPs and is subject the boiler MACT regulations under Subpart JJJJJ. NYS has not accepted delegation of this regulation so any enforcement of this regulation should be referred to USEPA.

Condition 36 - This monitoring condition has been included to address the visible emissions requirements of subpart 227-1 for combustion sources. Performance of Visible Emissions Observations (Method 9) will verify compliance with this requirement. This monitoring requirement is associated with visible emissions from a 20.9 MMBTU propane fired combustion source used to provide steam to the log kiln. The rule does not specify any monitoring frequency. Since, it is unlikely there will be any visible emissions of any magnitude from this type of fuel combustion, monitoring at Department's discretion is justified.

Condition 37 - Daily monitoring of visible emissions along with required Method 9 observations will provide reasonable assurance that the particulate level is being met on a daily basis. This monitoring condition has been included to address particulate emission requirements of subpart 227-1 for combustion sources. Stack testing will verify compliance with this requirement This monitoring requirement is associated with the emissions from the 16 MMBTU/hr wood waste boiler used to provide steam to the log kiln. The rule does not specify any monitoring frequency. The potential for this source to have some visible emissions depends on whether proper combustion techniques are being used. To insure these techniques are achieved, it is necessary to quantify these emissions once during the permit terms.

Condition 38 - This monitoring condition has been included to address visible emission requirements of subpart 227-1 for combustion sources. Performance of Visible Emission Observation (Method 9) will verify compliance with this requirement This monitoring requirement is associated with the emissions from a 16 MMBTU/hr wood waste boiler used to supply steam to the log kiln. The daily monitoring frequency of visible emissions is justified due to the highly variable nature of opacity emissions from this type of combustion. This monitoring condition requires if any visible emissions are noted for two consecutive days, other than steam, a Method 9 visible emissions observation shall be conducted within two day. If the opacity limit is contravened, it shall be reported to the Department within one business day along with corrective actions or a compliance schedule to assure compliance.