Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	**Boise Building Solutions, LLC**	**AI #:**	**4045**	**TEMPO Activity No:**	**PER20080001 PER20080002**
Facility Name:	**Oakdale Plywood Plant**	**Remarks Submitted by:**			
Permit Writer:	**Sanford Phillips**	**Permit Writer Email address:**	**Sanford.phillips@la.gov**		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Specific Condition 120", or "Section II Air Permits Briefing Sheet", etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted.*** Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- ***DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Both Title V and PSD Drafts	The changes requested below are specific to the Draft Title V Permit. However, when applicable, these changes should also be made to the PSD draft permit.	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Bis(2-ethylhexyl)phthalate needs to be <0.001 and the change value needs to be "-". ***(All these changes are from values found in the existing active permit dated June 7th, 2005)***	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Chlorinated dibenzo furans needs to be <0.0001 and the change value needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Chlorinated dibenzo-p-dioxins needs to be < 0.0001 and the change value needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Dichloromethane needs to be "0.2" and the change value needs to be "-0.01".	**This change has been made.**

Air Permit Briefing Sheet, (TAPs)	Before Value for n-Hexane needs to be 0.52 and the change value needs to be -0.02.	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Methyl bromide needs to be 0.01 and the change value needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Methyl Ethyl Ketone needs to be 0.024 and the change value needs to be +0.01.	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Pentachlorophenol needs to be <0.001	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for Polychlorinated Biphenyls (PCB) needs to be <0.001.	**This change has been made.**
Air Permit Briefing Sheet, (TAPs)	Before value for 1,1,1-Trichloroethane needs to be 0.02 and the change needs to be"-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Antimony needs to be 0.01 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Arsenic needs to be 0.016, the after value needs to be 0.016 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Barium needs to be 0.226, and the change needs to be -0.116.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Beryllium needs to be 0.01 and the change needs to be -0.009.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Cadmium needs to be 0.092 and the change needs to be -0.089.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Chlorine needs to be 0.56 and the change needs to be -0.05.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Chromium needs to be 0.016 and the change needs to be -0.006.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Cobalt needs to be 0.101 and the change needs to be -0.097.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Copper needs to be 0.03 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Lead needs to be 0.03 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Manganese needs to be 1.13 and the change needs to be -0.1.	**This change has been made.**
Air Permit Briefing	Before value for Mercury needs to be 0.01 and the change needs to	**This change has been made.**

Sheet, (Non-VOC TAPs)	be -0.009.	
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Nickel needs to be 0.02 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Phosphorus needs to be 0.02 and the change needs to be "-".	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Selenium needs to be 0.03 and the change needs to be -0.03.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Before value for Zinc needs to be 0.3 and the change needs to be - 0.02.	**This change has been made.**
Air Permit Briefing Sheet, (Non-VOC TAPs)	Add this Sentence to last paragraph on Page 5 Section IV: "and hazardous air pollutants (HAPs) pursuant to 40 CFR 63."	**This change has been made.**
Air Permit Briefing Sheet, (Insignificant Activities)	Delete "Fire Water Diesel Tank 1,000 gallons", add " Fire Water Diesel Tank #1 550 gallons" and "Fire Water Diesel Tank #2 280 gallons" This is a physical change to the facility to comply with fire code that does not increase emissions.	**This change has been made.**
Inventories, Page 1 of 2	For EQT 0005, LSV – Log Steam Vats, the max. operating rate units need to be changed from M bd ft/yr to MM sq ft/yr.	**This change has been made.**
Inventories, Page 1 of 2	EQT 0016, T3-Gasoline Tank, Max. Operating Rate units need to be changed from MM lbs/yr to gal./yr.	**This change has been made.**
Emission Rates for TAP/HAP & Other Pollutants	EQT 0003, B1, delete the row for 1,4 Dichlorobenzene.	**This change has been made.**
Emission Rates for TAP/HAP & Other Pollutants	EQT 0014, D4, Delete the rows for: Acrolein, Methyl isobutyl ketone, and Xylene	**This change has been made.**
Emission Rates for TAP/HAP & Other Pollutants	FUG 0001, PAF, delete the row for Ethylene Glycol. This chemical is not used in the formulation of our adhesives.	**This change has been made.**
Specific Requirements	CRG 0001 – Veneer Dryre is incorrectly spelled in all references. Should be Veneer Dryer.	**This change has been made.**
Specific Requirements	Delete SRs 1-3 & 5-6 as only one is required for Panel MACT compliance demonstration and SR 4 is the compliance demonstration selected by the facility.	**This change has been made.**
Specific Requirements	Delete SRs 11-15 as they apply only to re-dryers as defined by MACT. The facility does not have MACT defined re-dryers.	**This change has been made.**
Specific Requirements	Delete SRs 21-23. They are not applicable because the boiler is not an NSPS Boiler.	**This change has been made.**
Specific Requirements	Delete SR 55. Recordkeeping requirements in 2103.i are not applicable for the plant's gasoline tank.	**This change was not made. The referenced condition is applicable to tanks at this facility. LDEQ has determined that it is appropriate to list each referenced condition in the permit. The requirement states to keep records, as applicable to this specific tank.**

Specific Requirements	SR 56, change language to state: "40 CFR 63.2271(a). Maintain RTO fire box temperature at or above the minimum temperature established during the most recent performance test. Subpart DDDD. Which months: All Year Statistical Basis: 3-hour block average"	**The requirement was changed to the following: Temperature >=1500 F, for the firebox temperature. The owner or operator may redetermine the upper and/or lower temperature limit, as appropriate, based on data established during the most recent performance test or other information and submit an application to the applicable regulatory authority to change the applicable limit(s). The redetermined limit shall become effective upon approval by the applicable regulatory authority. The Department's approval need not be in the form of a permit modification if the conditions outlined in 40 CFR 70.4(b)(12) and 502(b)(10) of the Clean Air Act are satisfied, and can be incorporated under an administrative amendment. Subpart DDDD.** **Which Months: All year Statistical Basis: 3-hour block**
Specific Requirements	SRs 57-62. Change language to state: "40 CFR 63.2240(b). Comply with one of the six compliance options and operating requirements for RTOs listed in Tables 1b and 2 for all softwood veneer dryer heated zones. Subpart DDDD. Which months: All Year Statistical Basis: 3-hour block average."	**This change has been made.**
Specific Requirements	SR 75. Needs to be identical to SR 76 ("Statistical Basis: six-minute average")	**This change has been made.**
Specific Requirements	SR 77. Statistical Basis should be a 'three-hour average:', based on the source testing procedures, not "constant".	**This change has been made.**
Specific Requirements	SR 80, change language to state: "40 CFR 63.2271(a). Maintain RTO fire box temperature at or above the minimum temperature established during the most recent performance test. Subpart DDDD. Which months: All Year Statistical Basis: 3-hour block average"	**The requirement was changed to the following: Temperature >=1500 F, for the firebox temperature. The owner or operator may redetermine the upper and/or lower temperature limit, as appropriate, based on data established during the most recent performance test or other information and submit an application to the applicable regulatory authority to change the applicable limit(s). The redetermined limit shall become effective upon approval by the applicable regulatory authority. The Department's approval need not be in the form of a permit modification if the conditions outlined in 40 CFR 70.4(b)(12) and 502(b)(10) of the Clean Air Act are satisfied, and can be incorporated under an administrative amendment. Subpart DDDD.** **Which Months: All year Statistical Basis: 3-hour block**
Specific Requirements	SRs 81-86. Change to state: "40 CFR 63.2240(b). Comply with one of the six compliance options and operating requirements for RTOs listed in Tables 1b and 2 for all softwood veneer dryer heated zones."	**This change has been made.**
Specific Requirements	SR 99. Needs to be identical to SR 100 ("Statistical Basis: six-minute average")	**This change has been made.**
Specific Requirements	SR 101. Needs to be removed. The facility emits less than 5 TPY SO_2. This doesn't apply.	**This change has been made.**
Specific Requirements	SR 102. Statistical Basis should be a 'three-hour average:', based on the source testing procedure, not "constant".	**This change has been made.**
Specific Requirements	SR 105 needs to be moved from FUG-0001 to UNF 0001 because	**No change was made. This requirement applies to fugitive sources.**

	this applies to the entire facility, not just Panel Assembly Fugitives.	
Specific Requirements	SR 106. Annual resin usage needs to be changed to 10.4 MMlb/yr	**This change has been made.**
Statement of Basis	Page 2, Section V, 1st paragraph – modification is misspelled.	**This change has been made.**
Statement of Basis	Page 2, Section V, 3rd paragraph – wood waste is misspelled.	**This change has been made.**
Statement of Basis	Page 10, number 1 – the first sentence should read: "The facility's source category is <u>not</u> listed in Table A…"	**This change has been made.**
Statement of Basis	Page 11 under PSD Analysis Summary, the first sentence should read: " Based on the changes proposed by <u>the</u> Oakdale Plywood Plant…"	**This change has been made.**
Statement of Basis	Page 15, Section IX. The Q/d formula is incorrect, it should be : Q/d =(0 + 66.30 (NOX) + 3.22 (SO2) + 0)/365 = 0.19	**This change has been made.**
Statement of Basis	Page 15, Section X. Remove EQT011 through EQT015 additional monitoring requirements, as correctly stated in SRs 46-49 and SR 51, "due to the configuration of the exhaust stacks, Method 9 testing is not possible."	**The following statement was added to Section IX of the SOB: *Due to the configuration of the exhausts stacks, Method 9 testing is not possible for EQT11- EQT015.**
Statement of Basis	Page 17, Section XIV, the first sentence should read: "The Oakdale Plywood Plant's compliance history can be found in <u>Section 15-A</u> of the permit application."	**This change has been made.**