Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Martco Limited Partnership
Martco Limited Partnership - Chopin Mill
Chopin Natchitoches Parish, Louisiana
Agency Interest Number: 32484
Activity Number: PER20080001
Proposed Permit Number: 1980-00027-V6

I. APPLICANT

Company:
Martco Limited Partnership - Chopin Mill
1695 Hwy 490
Chopin, Louisiana 71447

Facility:
Martco Limited Partnership
1695 Hwy 490
Chopin, Natchitoches Parish, Louisiana
Latitude: 31° 29' 80", Longitude 92° 51' 84"

II. FACILITY AND CURRENT PERMIT STATUS

The Chopin Mill, an existing plywood manufacturing facility, began operation in 1994, under Permit No. 1980-00027-00, issued July 8, 1994. Martco Limited Partnership received an initial Part 70 permit for the Chopin Mill on September 8, 1996 and the first renewal permit on August 19, 2003. Martco's Chopin Mill currently operates under Permit No. 1980-00027-V5, issued January 17, 2007.

Martco Limited Partnership - Chopin Mill is a designated Part 70 source. The facility submitted timely applications for a renewal to the Part 70 permit.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Martco Limited Partnership on February 19, 2008 requesting a renewal and modification to the Part 70 operating permit. Additional information dated November 30, December 8, 2009, and January 29, 2010 was also received.

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Project

The Chopin Mill is a manufacturer of plywood and other wood products. Logs are unloaded from trucks and are stored in the log storage yard. Water is sprayed on the log piles to help prevent premature drying, condition the wood for processing, and protect the logs from decay. Logs are sent for debarking and conditioning. Afterwards they are prepared for processing. Bark is hogged and collected in a storage area for sale or transport to the fuel house where they are processed into acceptable fuel for the Wellons Furnaces and the Teaford Thermal Oil Heating Unit. These units heat oil for the two presses, the log heating vats, and the three veneer dryers.

Recycled wood waste generated in the manufacturing process provides the necessary heat and steam for the facility. Creosote treated lumber waste may also be disposed as fuel for the furnaces. Creosote treated lumber waste is a supplemental fuel used at not more than a 50% mix with untreated fuel. The creosote treated lumber waste is not a hazardous waste as defined in the Resource Conservation and Recovery Act (RCRA).

Debarked logs are cut into billets and placed on lathes. Lathes peel the wood to form green veneer. The billet cores are chipped, sold as round cores, or processed further and sold as a landscape product. The green veneer peeled from the billets is routed to the veneer composer area where the wood is glued together to form sheets. An on site glue mixing facility provides the glue. These plywood sheets along with other sized sheets are sent to the lay-up line where they are pressed together. The resulting plywood panels are trimmed to size and then sent to market.

This renewal of the Chopin Mill Title V Permit No. 1980-00027-V5 incorporates the results of a stack test which was conducted for Methanol on EQT027, 2-05 - 50 Opening Press C. The test results indicate that the Methanol emissions were not adequately permitted before and increased in value after the test. The total VOC rate at the source remained the same.

Proposed Permit

Permit No. 1980-00027-V6 will be the renewal and modification of Part 70 operating Permit No. 1980-00027-V5 for the Chopin Mill.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	48.83	48.83	-
SO_2	24.67	24.67	-
NO_X	130.57	130.57	-
CO	240.41	240.41	-
VOC *	61.10	61.10	-

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*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):		Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):	
Pollutant	Emissions	Pollutant	Emissions
Acetaldehyde	0.738	1,1,1 - Trichloroethane	< 0.001
Acrolein	0.008	Arsenic (and compounds)	0.002
Benzene	0.077	Barium (and compounds)	0.214
Chlorinated dibenzo-p-dioxins	0.000000024	Cadmium (and compounds)	0.001
Carbon disulfide	0.087	Chromium VI (and compounds)	0.003
Chlorinated dibenzofurans	0.000000024	Cobalt compounds	0.008
Chloroform	< 0.001	Copper (and compounds)	0.003
Ethylbenzene	< 0.001	Dichloromethane	0.447
Formaldehyde	9.906	Lead compounds	0.010
Methanol	9.164	Manganese (and compounds)	0.257
Methyl ethyl ketone	0.122	Mercury (and compounds)	< 0.001
Methyl isobutyl ketone	0.359	Selenium (and compounds)	< 0.001
Naphthalene	0.041	Zinc (and compounds)	0.108
Phenol	0.335	Total	1.055
Polynuclear Aromatic Hydrocarbons	0.064		
Styrene	0.009		
Toluene	0.011		
Trichloroethylene	0.001		
Xylenes	0.074		
Total	20.996		
Other VOC	40.104		

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

Shown in the tables below.

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I. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter													40 CFR 60 NSPS						40 CFR 63 NESHAP						40 CFR		
		2	5▲	509	9	11	13	15	2103	2113	51*	53*	56	59*	A	K	Ka	Kb	Db	Dc	A	HH	SS	VV	HHH	DDDD	52	64	68
UNF001	Chopin Mill	1	1		1	1	1			1	3		1	3	1											2			3
EQT001	1-94A - Veneer Dryer No. 1 Cooler Stacks		1																										
EQT002	2-94A - Veneer Dryer No. 2 Cooler Stacks		1																										
EQT003	3-94A - Veneer Dryer No. 3 Cooler Stacks		1																										
EQT004	5-94 - Sander No. 1 Cyclone		1				1																					1	
EQT005	6-94 - Sawline Sander No. 2 Composer Cyclone		1				1																					1	
EQT006	7-94 - Gasoline Storage Tank								1							3	3	3											
EQT007	8-94 - 50 Opening Press A		1																										
EQT008	8A-94 - 50 Opening Press B		1																										
EQT009	9-94 - Thermal Oil Heating Unit A																		3	1									
EQT010	9A-94 - Thermal Oil Heating Unit B																		3	1									
EQT011	1-97 - Dry Hog Cyclone		1				1																						
EQT012	1-02 - Filler Storage Silo 44132-1		1				1																						

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		2	5▲	509	9	11	13	15	2103	2113	51*	53*	56	59*	A	K	Ka	Kb	Db	Dc	A	HH	SS	VV	HHH	DDDD	52	64	68
EQT013	2-02 - Corn Flour Storage Silo 44133-1		1				1																						
EQT014	3-02 - Wheat Flour Storage Silo 44134-1		1				1																2	2	2				
EQT015	4-02 - Soda Ash Dump Station 44135		1				1																						
EQT016	5-02 - Filter Receiver 44139		1				1																						
EQT017	6-02 - Reactor Complete Additive Tank								3							3	3	3											
EQT018	7-02 - Resin/RCA Weigh/Dump Tank								3							3	3	3											
EQT025	8-02 – Power Bin Vent 44145		1				1																						
EQT026	1-05 – Veneer Dryer No. 4 Cooler Stacks		1																										
EQT027	2-05 – 50 Opening Press C		1																										
EQT028	4-05 – Dry Waste Cyclone/ Baghouse System No. 2		1				1																					1	
EQT029	3-05 – Thermal Oil Heating Unit C		1			1	1	3											3	1								1	
EQT030	1-06 Dry Fuel Transport System Baghouse		1				1																					1	
FUG001	11-94 Fugitives/Debarker		1				1																						

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RLP032	9-94/9A-94 – Thermal Oil Heating Unit A & B		1			1	1	3																				1	

* The regulations indicated above are State Only regulations.
▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF001	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5101.A]	DOES NOT APPLY. The provisions of this LAC 33:III Chapter 51 apply to any major source of TAPs as defined in LAC 33:III.5103.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.5901]	DOES NOT APPLY. The Chopin Mill contains no sources which produce, handle, process, or store substances listed in LAC 33:III.5907.A Table A in quantities greater than the listed threshold.
	Chemical Accident Prevention Provisions [40 CFR 68]	DOES NOT APPLY. The Chopin Mill contains no sources which produce, handle, process, or store substances listed in 40 CFR 68.130 in quantities greater than the listed threshold.
EQT006	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. The gasoline tank was constructed after May 19, 1978.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. The gasoline tank was constructed after July 23, 1984.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The capacity of the gasoline tank is less than 40 cubic meters.
EQT009, EQT010	NSPS Subpart Db - Standards of Performance for IndustrialCommercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	DOES NOT APPLY. The provisions of this Subpart apply to steam generating units that have a heat input capacity greater than 100 MM Btu/hr.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT017, EQT018	Control of Emissions of Organic Compounds – Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. The vapor contents of the material being stored are less than 1.5 psia.
	NSPS Subpart K – Standards of Performance for Storage Vessels for Which Construction, Reconstruction, or Modification Commences after June 11, 1973 and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. The gasoline tank was constructed after May 19, 1978.
	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after May 18, 1978 and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. The gasoline tank was constructed after July 23, 1984.
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. The capacity of the gasoline tank is less than 40 cubic meters.
EQT029	Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]	DOES NOT APPLY. The provisions of LAC 33:III Chapter 15 are not applicable to sources that have the potential to emit of less than 5 tons per year.
	NSPS Subpart Db - Standards of Performance for Industrial Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	DOES NOT APPLY. The provisions of this Subpart apply to steam generating units that have a heat input capacity greater than 100 MM Btu/hr.
RLP032	Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]	DOES NOT APPLY. The provisions of LAC 33:III Chapter 15 are not applicable to sources that have the potential to emit of less than 5 tons per year.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
RLP032 (Continued)	Compliance Assurance Monitoring [40 CFR 64.2(3)]	DOES NOT APPLY. CAM does not apply to PM10 because the emissions are less than 100 TPY prior to use of the control device

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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Prevention of Significant Deterioration/Nonattainment Review

Prevention of Significant Deterioration (PSD) review is not required for this permit modification. The New Iberia Facility is not listed as one of the 26 source categories in LAC 33:III.509.B.Table A nor does it have the potential to emit of 250 TPY of any criteria pollutant.

A streamlined fugitive emission monitoring program is not included in this permit.

Chopin Mill	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
NA	NA	NA	NA

MACT Requirements

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

Air Quality Analysis

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield is not included in the proposed permit per 40 CFR 60.6(f) and LAC 33:III.507.I.

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VI. PERIODIC MONITORING

Source		Monitor	Method	Citation
EQT001	1-94A - Veneer Dryer No. 1 Cooler Stacks	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT002	2-94A - Veneer Dryer No. 2 Cooler Stacks	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT003	3-94A - Veneer Dryer No. 3 Cooler Stacks	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT004	5-94 –Sander No. 1 Cyclone	Leaks of PM_{10} Emissions	Continuous monitoring using leak detection system	40 CFR 64.6(c)
EQT005	6-94 – Sawline Sander No. 2 Composer Cyclone	Leaks of PM_{10} Emissions	Continuous monitoring using leak detection system	40 CFR 64.6(c)
EQT007	8-94 - 50 Opening Press A	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT008	8A-94 - 50 Opening Press B	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
RLP032	9-94/9A-94 – Thermal Oil Heating Unit A & B	Temperature	Minimum temperature of 1,000° F	40 CFR 64.6(c)
		Operating Time	Technically sound method	LAC 33:III.507.H.1.a
		Fuel Rate	Monitor fuel rate of crosstie derived fuel	LAC 33.III.507.H.1.a
		Opacity	Continuous Opacity Monitor	40 CFR 60.47c
EQT011	1-97 – Dry Hog Cyclone	Visible Emissions	Daily visual inspection	LAC 33:III.501.C.6
		Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT026	1-05 – Veneer Dryer No. 4 Cooler Stacks	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT027	2-05 – 50 Opening Press C	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
EQT028	4-05 – Dry Waste Cyclone/Baghouse System No. 2	Leaks of PM_{10} Emissions	Continuous monitoring using leak detection system	40 CFR 64.6(c)
EQT029	3-05 – Thermal Oil Heating Unit C	Opacity	Continuous Opacity Monitor	40 CFR 60.47c
		Temperature	Minimum temperature of 1,000° F	40 CFR 64.6(c)
		Operating Time	Technically sound method	LAC 33:III.507.H.1.a
		Maximum Heat Input	Technically sound method	LAC 33:III.507.H.1.a
EQT030	1-06 – Dry Fuel Transport System Baghouse	Leaks of PM_{10} Emissions	Continuous monitoring using leak detection system	40 CFR 64.6(c)
EQT030	1-06 Dry Fuel Transport System Baghouse	Operating Time	Technically sound method	LAC 33:III.507.H.1.a
FUG001	11-94 Fugitives/Debarker	Operating Time	Technically sound method	LAC 33:III.507.H.1.a

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_X) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.