

References 1C -

Permits

- 1C-01 Columbia Forest Products, air permit, August 28, 2003 (excerpt).
- 1C-02 – 1C-08 Thomas L. Henderson, “Analysis and Evaluation . . .,” October 30, 1980.
- 1C-09 – 1C-11 State Air Pollution Control Board permit notification, December 29, 1980.
- 1C-12 SECOR, “Backup Documentation,” June 17, 1996.
- 1C-13 Draft permit, October 14, 1997 (excerpt).
- 1C-14 Draft permit, undated (excerpt).
- 1C-15 – 1C-16 SECOR, “Comments on Draft No. 3 Operating Permit,” December 16, 1997.
- 1C-17 – 1C-18 DEQ-Lynchburg (Larry Leonard) to Brad Thompson, reply concerning third revised draft permit, December 23, 1997.
- 1C-19 Columbia Forest Products, air permit, February 9, 1998 (excerpt).

OPERATING/EMISSION LIMITATIONS

6. **Fuel** - The approved fuel for the boiler is wood waste generated from the hardwood panel consolidation facility, excluding any wood which contains chemical treatments or paper or plastic laminates. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850 of State Regulations)

7. **Not Used**

8. **Processing** - The UV finishing line shall process no more than 84,096,000 square feet of plywood surface per year, calculated as the sum of each consecutive 12 month period.
(9 VAC 5-170-160 of State Regulations)

9. **Emission Limits** - Emissions from the dust system controlled by UVB (including the roll coater sanders) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	3.4 tons/yr
PM-10	0.01 gr/dscf	3.4 tons/yr

The tons/yr emissions limits are derived from the estimated overall emission contribution and are included for emission inventory purposes. Compliance with these limits shall be determined as stated in Condition numbers 8 and 16.

(9 VAC 5-50-260 of State Regulations)

10. **Emission Limits** - Emissions from the woodworking operations shall not exceed the limits specified below:

Particulate Matter	4.0 lbs/hr	6.3 tons/yr
PM-10	4.0 lbs/hr	6.3 tons/yr

(9 VAC 5-80-850 of State Regulations)

11. **Emission Limits** - Emissions from the operation of the boiler shall not exceed the limits specified below:

Particulate Matter	0.4 lbs/10 ⁶ Btu	12.3 tons/yr
PM-10	0.4 lbs/10 ⁶ Btu	12.3 tons/yr
Sulfur Dioxide	0.1 lbs/hr	0.3 tons/yr

(9 VAC 5-80-850 of State Regulations)

12. **Not Used**

Assistant Executive Director-Enforcement

Director, Region III

Analysis and Evaluation of Permit Application by Whittle Plywood Corp., Chatham, Virginia - Registration No. 30120

October 30, 1980

INTRODUCTION AND BACKGROUND: Whittle Plywood Corp. has applied for a permit to install a new wood fired boiler. This boiler will be in addition to the two existing #2 oil/gas boilers. These boilers will be used as emergency standby units. The source is located in a commercial section of the town of Chatham on State Road 1424, one-half mile north of Route 57. The existing source manufactures plywood panels for cabinets and special orders.

PERMIT APPLICATION: Whittle Plywood Corp. desires to install and operate a new 7 x 10⁶ BTU input automatically fed wood fired boiler. Kiln dried wood will be used as fuel. Particulate emissions will be controlled by a Zurn multi-cyclone with a design efficiency of 90%. Sulfur emissions will be controlled by low sulfur fuel. The woodwaste fuel is transferred from the saws to a cyclone to a storage bin. The woodwaste will be conveyed to either a blower for pneumatic firing or will be screw conveyed to an overhead feeder to the boiler. Construction of this boiler is to commence December 1, 1980 and is to be completed January 1, 1981.

DISCUSSION: The Regional Director performed a preconstruction inspection on October 22, 1980. Testing ports are not required. Seventy percent of the heat output will be for process and thirty percent for space heating.

ENGINEERING EVALUATION: See enclosure (1) for estimated emissions and allowable emissions.

SPECIAL CONSIDERATIONS: The Whittle Plywood Corp. is located in an attainment area for both particulates and sulfur dioxide. There will be no significant increase in these pollutants, and therefore, little or no impact on existing air quality. The permit is meeting the requirements of Section 5.42 of the Regulations. NSPS, NESHAPS, PSD and Emission Offset are not applicable. A public hearing is required.

RECOMMENDATION: It is recommended that the permit for Whittle Plywood Corp. be approved subject to a public hearing and the conditions listed in enclosure 2.

Prepared by Thomas L. Henderson Approved by W. W. Parks
 Thomas L. Henderson, Regional Engineer W. W. Parks, Regional Director

1. Modification and operation shall be conducted as proposed in the October 22, 1980 permit application.
2. The particulate emissions from the boiler shall not exceed 0.40 lb/10⁶ BTU input or 12.26 tons per year.
3. The sulfur dioxide emissions from the boiler shall not exceed 0.66 pounds per hour or 2.89 tons per year.
4. Compliance with Part V, Section 5.03 - Performance Testing - of the Regulations for the Control and Abatement of Air Pollution requires a visible emission evaluation of the boiler by a qualified staff member. The details of the visible emission evaluation are to be arranged with the Director, Region III.
5. Part V Section 5.05 - Notification, Records and Reporting - of the Regulations for the Control and Abatement of Air Pollution requires that the Board (Attention: Director, Division of Compliance) and Director, Region III be furnished written notification of:
 - a. The date of commencement of modification postmarked no later than 30 days after such date.
 - b. The actual date of initial start-up of the boiler postmarked within 15 days after such date.
6. The approved fuel for this unit is woodwaste. Any change from this fuel requires a permit to modify and operate under Section 2.33 of the Regulations for the Control and Abatement of Air Pollution.
7. The Board reserves the right to modify and, if appropriate, to reissue or to rescind this permit if prior to operation there is a substantive change to the design capacity or the fundamental nature of the process or control equipment such that the potential to emit of any facility is increased.
8. The Board reserves the right to modify and, if appropriate, to reissue or to rescind this permit if prior to operation there is a substantive change in any of the data upon which the decision to approve this permit was based.
9. All local zoning and building requirements must be met before commencing construction.

1. POTENTIAL EMISSIONS:

	<u>Present</u>	<u>New/Modified - Woodwaste</u>
Maximum rated capacity: ¹	_____	7 x 10 ⁶ BTU/hr. input
Emission Factor: ²	_____	5 lb/ton
Reference: ³	_____	AP-42 (Sec. 1.6)
Operating Schedule: ¹	_____	8760 hr/yr.
Estimated annual production: ⁴	_____	0.44 ton/hr.
Total Potential Emissions:	_____	
	lbs/hr	2.20 lbs/hr
	lbs/day	52.80 lbs/day
	tons/yr	9.64 tons/yr

2. ACTUAL EMISSIONS:

	<u>Present</u>	<u>New/Modified</u>
Normal feed input: ¹	_____	0.44 ton/hr.
Emission Factor: ²	_____	5 lb/ton
Reference: ³	_____	AP-42 (Sec. 1.6)
Overall Control Efficiency: ⁵	_____ %	85 %
Total Controlled Emissions:	_____	
	lbs/hr	0.33 lbs/hr
	lbs/day	7.92 lbs/day
	tons/yr	1.45 tons/yr

3. ALLOWABLE EMISSIONS:

Reference: ³	_____	Asst. Exec. Dir. Memo of 1/10/80
Standard:	_____	(0.40 lb/10 ⁶ BTU input)
	lbs/hr	2.80 lbs/hr
	lbs/day	67.20 lbs/day
	tons/yr	12.26 tons/yr

1. POTENTIAL EMISSIONS:

Maximum rated capacity:¹
Emission Factor:²
Reference:³
Operating Schedule:⁴
Estimated annual production:⁴
Total Potential Emissions:

Present

lbs/hr
lbs/day
tons/yr

New/Modified - Woodwaste
7 x 10⁶ BTU/hr input
1.5 lb/ton
AP-42 (Sec. 1.6)
8760 hr/yr
0.44 ton/hr.
0.66 lbs/hr
15.84 lbs/day
2.89 tons/yr

2. ACTUAL EMISSIONS:

Normal feed input¹
Emission Factor:²
Reference:³
Overall Control Efficiency:⁵
Total Controlled Emissions:

Present

%
lbs/hr
lbs/day
tons/yr

New/Modified

%
lbs/hr
lbs/day
tons/yr

3. ALLOWABLE EMISSIONS:

Reference:³
Standard:

lbs/hr
lbs/day
tons/yr

Sec. 5.42 of the
Regulations
0.66 lbs/hr
15.84 lbs/day
2.89 tons/yr

The permit is approved under the authorities delegated to the Executive Director by the Board subject to the following conditions:

1. 1 ~~Relocation, Installation, Construction,~~ Modification and operation shall be conducted as proposed in the October 22, 1980 submittal.
2. X The yearly production of _____ shall not exceed _____ tons.
3. X The plant shall not operate more than _____ hours per day.
4. 2 The particulate emissions from the _____ boiler shall not exceed 0.40 lb/10⁶ BTU input or 12.26 tons per year.
 - 3 The sulfur dioxide emissions from the _____ boiler shall not exceed 0.66 pounds per hour or 2.89 tons per year.
 - X The volatile emissions from the _____ shall not exceed _____ pounds per hour or _____ tons per year.
 - X The nitrogen oxide emissions from the _____ shall not exceed _____ pounds per hour or _____ tons per year.
5. X Quarterly progress reports shall be submitted to the Board (Attention: Director, Division of Compliance) and the Region _____ Director, address below, beginning _____.
6. X A final completion report shall be submitted to the Board (Attention: Director, Division of Compliance) and Region _____ Director, address below, within 5 days after the _____ is, are put into operation.
7. 4 Compliance with Part V, Section 5.03 - Performance Testing - of the Regulations for the Control and Abatement of Air Pollution requires a visible emission evaluation of the _____ boiler by a qualified staff member. The details of the visible emission evaluation are to be arranged with the Region III Director. ~~The boiler~~ ~~is intended for testing of the~~ ~~is approved because of~~ ~~the substance of acceptable test performed by~~

8. X Compliance with Part V, Section 5.03 - Performance Testing - of the Regulations for the Control and Abatement of Air Pollution requires a particulate emission test of the _____

The _____ must be operating at design conditions during the testing. The test must be performed within 60 days after achieving the maximum operating rate but not more than 180 days after the date of initial operation. The standards prescribed in Part IV, Section 4.40(b)(2) of the Regulations for the Control and Abatement of Air Pollution shall apply to these tests. The details of the emission testing are to be arranged with the Region _____ Director.

9. 5 Part V Section 5.05 - Notification, Records and Reporting - of the Regulations for the Control and Abatement of Air Pollution requires that the Board (Attention: Director, Division of Compliance) and Region _____ Director be furnished written notification of:

- a. The date of commencement of ~~construction or reconstruction,~~ modification postmarked no later than 30 days after such date.
- b. The anticipated date of the initial start-up of the _____ postmarked not more than 60 days nor less than 30 days prior to such date.
- c. The actual date of initial start-up of the _____ boiler _____ postmarked within 15 days after such date.
- d. The anticipated date of the performance tests of the _____ and of the continuous monitoring systems performance evaluation postmarked at least 30 days prior to such date.

10. X The Board (Attention: Director, Division of Compliance) and Region _____ Director each must be furnished within 60 days, a copy of the results of the emission tests required in condition _____ above.
11. 6 The approved fuel for this unit is woodwaste. Any change from this, these fuels requires a permit to modify and operate under Section 2.33 of the Regulations for the Control and Abatement of Air Pollution.
12. X The _____ shall comply with all provisions of 40 CFR 60, Subpart _____ (attached), Standards of Performance for New Stationary Sources, _____.
13. 7 The Board reserves the right to modify and, if appropriate, to reissue or to rescind this permit if prior to operation there is a substantive change to the design capacity or the fundamental nature of the process or control equipment such that the potential to emit of any facility is increased.
14. 8 The Board reserves the right to modify and, if appropriate, to reissue or to rescind this permit if prior to operation there is a substantive change in any of the data upon which the decision to approve this permit was based.

1. The proposed project will be designed, built, equipped and able to operate in compliance with applicable provisions of the Regulations for Control and Abatement of Air Pollution.
2. The proposed project will be able to operate without causing or exacerbating a violation of the National Ambient Air Quality Standards, and will not prevent the attainment or maintenance of those standards if constructed.
3. The source will be designed built and equipped to comply with the standards of performance prescribed under Part V 5.42(b).
4. The source will not emit hazardous pollutants in excess of the standards prescribed in Part VI 6.22(b).

In view of the above facts and pending the results of the public comment period and hearing, the proposed project is deemed approvable by the State Air Pollution Control Board staff.

William M. Jewell, Jr.
Director, Division of Compliance
State Air Pollution Control Board

6 14/16
RECEIVED

DEC 31 1980

REGION III

December 29, 1980

Mr. Henry D. Whittle, Jr.
Whittle Plywood Corporation
Drawer F
Chatham, Virginia 24531

Location: Chatham
Registration Number: 30120

Dear Mr. Whittle:

The Staff of the State Air Pollution Control Board has analyzed your permit application to modify and operate a new boiler fired with woodwaste. The permit application was deemed complete on October 30, 1980 after receipt of the application dated October 22, 1980. A public hearing was held on December 18, 1980 to allow comments on this project.

The new additional boiler is manufactured by Houston, Stanwood and Compie, Model #CU, with a rated input capacity of 7×10^6 BTU/hr. The emissions are to be controlled by a multicyclone.

The permit is approved under the authority delegated to the Executive Director by the Board subject to the following conditions:

1. Modification and operation shall be conducted as proposed in the October 22, 1980 permit application.
2. The particulate emissions from the boiler shall not exceed 0.40 lb/10⁶ BTU input or 12.26 tons per year.
3. The sulfur dioxide emissions from the boiler shall not exceed 0.66 pounds per hour or 2.67 tons per year.
4. Compliance with Part V, Section 5.03 - Performance Testing - of the Regulations for the Control and Abatement of Air Pollution requires a visible emission evaluation of the boiler by a qualified staff member. The details of the visible emission evaluation are to be arranged with the Director, Region III.

3. Part V Section 5.05 - Notification, Records and Reporting - of the Regulations for the Control and Abatement of Air Pollution requires that the Board (Attention: Director, Division of Compliance) and Director, Region III be furnished written notification of:
 - a. The date of commencement of modification postmarked no later than 30 days after such date.
 - b. The actual date of initial start-up of the boiler postmarked within 15 days after such date.
6. The approved fuel for this unit is woodwaste. Any change from this fuel requires a permit to modify and operate under Section 3.33 of the Regulations for the Control and Abatement of Air Pollution.
7. The Board reserves the right to modify and, if appropriate, to refuse or to rescind this permit if prior to operation there is a substantive change to the design capacity or the fundamental nature of the process or control equipment such that the potential to emit of any facility is increased.
8. The Board reserves the right to modify and, if appropriate, to refuse or to rescind this permit if prior to operation there is a substantive change in any of the data upon which the decision to approve this permit was based.
9. All local zoning and building requirements must be met before commencing construction.

Part II, Section 2.11 - Conditions on Approvals - of the Regulations for the Control and Abatement of Air Pollution provides for the automatic revocation of this permit if the owner or other person fails to adhere to these conditions.

Part II, Section 1.33(h) - Permits - New and Modified Sources - Revocation of Permits - of the Regulations for the Control and Abatement of Air Pollution provides that this permit becomes invalid if a program of continuous construction, reconstruction or modification is not commenced within 18 months from the date the permit is granted, if a program of construction, reconstruction or modification is discontinued for a period of 18 months or more, or if a program of construction, reconstruction or modification is not completed within a reasonable time. The regulations provide that the above time periods may be extended if there are delays in getting approval from other governmental entities or if there is litigation involved; also, the Board may extend the above time periods upon a satisfactory showing that an extension is justified.

You are cautioned that approval of this permit should not be construed to mean your operation is automatically in compliance with all aspects of the Regulations for the Control and Abatement of Air Pollution. Regional personnel will be constantly evaluating all sources for compliance with Part V, Section 5.12 - Emission Standards for Visible Emissions and Section 5.13 - Fugitive Dust.

Mr. Henry B. Whittle
December 29, 1980
Page 3

In addition, yearly updating of emissions from sources will require visits by staff personnel. Compliance with all air pollution regulations must be a continuing, full time effort.

This permit approval is only applicable to the permit requirements of the Air Pollution Control Board and does not alter permit requirements by any other local, state or federal government agency.

Sincerely,

W. R. Meyer
Executive Director

By John M. Daniel, Jr.
Assistant Executive Director

WAN/KLN/jld

cc: Director, Division of Compliance
Director, Division of Engineering

Director, Region III
State Air Pollution Control Board
7701-02 Timberlake Road
Lynchburg, Virginia 24502

**Boiler Emission Estimates
Emission Unit 1
Backup Documentation**

The facility uses a hogged fuel boiler to provide steam for the plywood presses. The hogged fuel is "white wood" (no bark) consisting of plywood trim, sawdust, sander dust, and scrap such as crate heads. The average moisture content is estimated to be 10%.

Criteria pollutant emission factors were obtained from AP-42 Table 1.6-1 for wood-fired boilers with a mechanical collector without flyash reinjection. HAP emissions were obtained from AP-42 Tables 1.6-2 and 1.6-3 for stoker boilers. The AP-42 emission factors and the hogged fuel usage were corrected to a bone dry ton (BDT) basis prior to performing emission calculations.

SECOR calculated the emissions by multiplying the emission factors by the fuel usage of the boiler. The hogged fuel usage was calculated based on boiler feed rate at 80% firing rate and the hours of operation for 1995 and for the max-op scenario. Short-term fuel usage for was calculated based on the 100% firing rate. The boiler emissions for the 1995 actual hogged fuel usage and the max-op scenario are presented in Tables 3, 3a, 4, and 4a.

7. The approved fuel for the boiler is wood waste, excluding any wood which contains chemical treatments or has affixed thereto paint and/or finishing materials or paper or plastic laminates. A change in the fuel may require a permit to modify and operate.
 (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
8. The diesel engine shall consume no more than 60,000 gallons of diesel fuel per year, calculated as the sum of each consecutive 12 month period.
 (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
9. The UV finishing line shall process no more than 84,096,000 square feet of plywood surface per year, calculated as the sum of each consecutive 12 month period.
 (9 VAC 5-20-110 (formerly Section 120-02-11) of State Regulations)
10. The presses shall process no more than 3,528,000 (4' x 8' x 11/16" basis) panels per year, calculated monthly as the sum of each consecutive 12 month period.
 (9 VAC 5-20-110 (formerly Section 120-02-11) of State Regulations)
11. Emissions from the woodworking operations (excluding the roll coater sander) shall not exceed the limits specified below:
- | | | |
|-----------------------------|------------|-------------|
| Total Suspended Particulate | 1.4 lbs/hr | 2.8 tons/yr |
| PM-10 | 1.4 lbs/hr | 2.8 tons/yr |
- (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
12. Emissions from the operation of the boiler shall not exceed the limits specified below:
- | | | |
|-----------------------------|-----------------------------|--------------|
| Total Suspended Particulate | 0.4 lbs/10 ⁶ Btu | 12.3 tons/yr |
| PM-10 | 0.4 lbs/10 ⁶ Btu | 12.3 tons/yr |
| Sulfur Dioxide | 0.7 lbs/hr | 2.9 tons/yr |
- (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
13. Emissions from the operation of the diesel engine shall not exceed the limits specified below:
- | | | |
|---------------------------------------|-------------|--------------|
| Total Suspended Particulate | 0.8 lbs/hr | 1.1 tons/yr |
| PM-10 | 0.8 lbs/hr | 1.1 tons/yr |
| Sulfur Dioxide | 0.8 lbs/hr | 1.1 tons/yr |
| Nitrogen Oxides (as NO ₂) | 11.8 lbs/hr | 16.8 tons/yr |
| Carbon Monoxide | 2.5 lbs/hr | 3.6 tons/yr |
| Volatile Organic Compounds | 1.0 lbs/hr | 1.4 tons/yr |
- (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)



December 16, 1997

Mr. Larry Leonard
 Mr. Frank Bowman
 Commonwealth of Virginia
 Department of Environmental Quality
 Lynchburg Satellite Office
 7705 Timberlake Road
 Lynchburg, Virginia 24502

DEC 22 1997
 DEQ LYNCHBURG

RE: Comments on Draft No. 3 Operating Permit
 Registration #30120
 Columbia Forest Products, Panel Products Division, Chatham, Virginia
 SECOR PN: F0169-007-01

Gentlemen:

SECOR International Incorporated (SECOR) has been retained by Columbia Forest Products (CFP) to review the Stationary Source Permit to Operate drafted by the Commonwealth of Virginia Department of Environmental Quality (DEQ) dated December 4, 1997. At CFP's request, SECOR has prepared this review of the draft Permit to Operate.

CFP requests that the following changes be made to the draft permit:

Condition 2

CFP would like the equipment list revised for clarity. CFP suggests that the bottom four bullet items in the equipment list should be consolidated to read:

- UV coating operation (two sanders, two roll coaters, and two UV lamp sets)
- three spreaders (two Black Brothers 104" and one Globe 108")
- two presses (Baldwin and Williams White)

Condition 4

Condition 4 relates to the old UV line dust collection system exhausting inside the building. That system was replaced by the Pneumafil baghouse exhausting outside the building, as submitted in the permit modification dated November 4, 1997. CFP requests that this condition be corrected to be appropriate for the new modifications. For instance, the phrase "with no exhaust to the ambient air" should be deleted to suit the new baghouse system.

Mr. Larry Leonard
 Mr. Frank Bowman
 December 16, 1997
 Page 2

Condition 6

As discussed in the comments on Condition 4, this condition also relates to the old dust collection system. CFP requests that the condition be modified to delete the requirement that the transfer system be "controlled by a complete enclosure."

Condition 7

As the DEQ is aware, CFP burns the ply trim from plywood which contains resin, as well as sanderdust which contains sealer coating material, in the boiler. The facility would like this acceptable practice to be documented in writing to distinguish it from "any wood which contains chemical treatments ..."

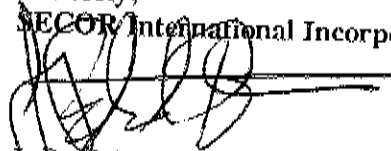
Condition 14


It was agreed during the December 3, 1997 conference call that the permit limit for total VOC and total HAP emissions would be adjusted to a maximum of 19.6 tons/yr. This limit includes a maximum of 9.8 tons/yr of methanol and 9.8 tons/yr of formaldehyde emitted simultaneously. These changes were made in the December 4, 1997 draft permit; however, the corresponding short-term emissions appear to have been overlooked. Therefore, CFP requests that the short-term formaldehyde limit be changed from 4.2 lbs/hr to 4.9 lbs/hr, as submitted in Table 7a of the SECOR fax dated December 3, 1997.

On behalf of Columbia Forest Products, SECOR appreciates the opportunity to provide these comments regarding the draft stationary source permit to operate. SECOR and CFP would be happy to provide any additional information which the Department requires to implement the requested modifications and develop an improved permit document.

Sincerely,

SECOR International Incorporated


 J. Patrick Stevens
 Associate Mechanical Engineer


 Jay W. Russell
 Principal Chemist

JPS/JWR:kld

cc: Mr. Brad Thompson, Columbia Forest Products, Chatham, VA
 Mr. Doane Cowan, Columbia Forest Products, Chatham, VA
 Mr. Dave Abts, Columbia Forest Products, Chatham, VA

PERMIT CONDITIONS - the regulatory reference and authority for the condition is listed in parentheses () after each condition.

1. Except as specified in this permit, the permitted facility is to be operated as represented in the permit application dated November 20, 1996, including amendment information dated November 4, 1997. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit.
(9 VAC 5-80-40 D (formerly Section 120-08-04 D) of State Regulations)
2. Equipment consists of:
 - a 7,000,000 Btu/hr rated input capacity Houston, Stanwood and Cample boiler, Model #CU
 - a 2,940,000 Btu/hr rated input capacity Cummins diesel engine (for wood hog)
 - UV coating operation (2 sanders, 2 roll coaters, and 2 UV lamp sets)
 - three spreaders (2 Black Brothers 104" and 1 Globe 108")
 - two presses (Baldwin and Williams White)

The woodworking equipment consists of assorted pieces of woodworking equipment, including but not limited to:

 - Progressive saw
 - sanders (back, face, and 1/4")
 - one wood hog
3. Particulate emissions from the boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection.
(9 VAC 5-80-40 F (formerly Section 120-08-04 F) of State Regulations)
4. Particulate emissions from all saws and sanders shall be controlled by a fabric filter. The fabric filter shall be provided with adequate access for inspection.
(9 VAC 5-80-10 H, 9 VAC 5-40-260 and 9 VAC 5-50-260 (formerly Sections 120-08-01 H, 120-04-1703 and 120-05-0403) of State Regulations)
5. All subsequent transfer of the collected material from the roll coater sander including truck loading shall be controlled by a fabric filter and/or a completely enclosed transfer system. Fugitive particulate emissions from the collection and transferring of collected wood waste shall be controlled by complete enclosure.
(9 VAC 5-20-110 (formerly Section 120-02-11) of State Regulations)
6. The approved fuel for the boiler is wood waste generated from the hardwood panel consolidation facility, excluding any wood which contains chemical treatments ~~or has affixed thereto paint and/or finishing materials~~ or paper or plastic laminates. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
7. The diesel engine shall consume no more than 60,000 gallons of diesel fuel per year, calculated as the sum of each consecutive 12 month period.
(9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

Becky Norton Dunlop
Secretary of Natural Resources

LYNCHBURG SATELLITE OFFICE

7705 Timberlake Road
Lynchburg, Virginia 24502
(804) 582-5120
FAX (804) 582-5125
<http://www.deq.state.va.us>

December 23, 1997

Thomas L. Hopkins
Director

Thomas L. Henderson
Regional Director

Mr. Brad Thompson
Panel Products General Manager
Columbia Forest Products
100 Paul Road, SW
P.O. Drawer F
Chatham, VA 24531

Location: Chatham
Registration No: 30120
County-Plant No: 143-0017

Dear Mr. Thompson:

Attached is a copy of the third revised draft permit for the hardwood panel consolidation facility located at 100 Paul Road, SW in Chatham, Virginia. Please review and respond with any comments in writing by January 5, 1998.

Regarding your concerns expressed in the December 16, 1997 letter from SECOR, the following is provided:

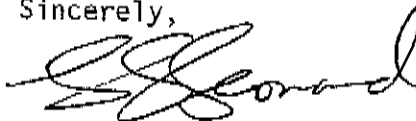
- the equipment list has been revised to agree with your request
- the phrase "with no exhaust to the ambient air" has been deleted from condition about the baghouse
- all transfer of material collected by a baghouse must be controlled by a complete enclosure (Condition 5)
- the "wood waste" condition has been clarified; it includes composite wood generated on-site, but prohibits burning of waste containing plastics or chemical treatments such as creosote
- the formaldehyde emission limit has been changed to 4.9 pounds per hour

You are advised that this office will not continue to process the permit application until written comments are received. If the draft permit is acceptable, please state so in your written comments.

Mr. Brad Thompson
Page 2

If you have any questions, please contact Frank Bowman of this office, at
(804) 582-5120.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Leonard".

Larry Leonard
Air Permit Manager

LSL:gfb

attachment

cc: Patrick Stevens

Columbia Forest Products
 Registration Number: 30120
 February 9, 1998
 Page 2

PERMIT CONDITIONS - the regulatory reference and authority for the condition is listed in parentheses () after each condition.

1. Except as specified in this permit, the permitted facility is to be operated as represented in the permit application dated November 20, 1996, including amendment information dated November 4, 1997. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit.
 (9 VAC 5-80-40 D (formerly Section 120-08-04 D) of State Regulations)
2. Equipment consists of:
 - a 7,000,000 Btu/hr rated input capacity Houston, Stanwood and Cample boiler, Model #CU
 - a 2,940,000 Btu/hr rated input capacity Cummins diesel engine (for wood hog)
 - UV coating operation (2 sanders, 2 roll coaters, and 2 UV lamp sets)
 - three spreaders (2 Black Brothers 104" and 1 Globe 108")
 - two presses (Baldwin and Williams White)

The woodworking equipment consists of assorted pieces of woodworking equipment, including but not limited to:

 - Progressive saw
 - sanders (back, face, and 1/4")
 - one wood hog
3. Particulate emissions from the boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection.
 (9 VAC 5-80-40 F (formerly Section 120-08-04 F) of State Regulations)
4. Particulate emissions from all saws and sanders shall be controlled by a fabric filter. The fabric filter shall be provided with adequate access for inspection.
 (9 VAC 5-80-10 H, 9 VAC 5-40-260 and 9 VAC 5-50-260 (formerly Sections 120-08-01 H, 120-04-1703 and 120-05-0403) of State Regulations)
5. All subsequent transfer of the collected material from the roll coater sander including truck loading shall be controlled by a fabric filter and/or a completely enclosed transfer system. Fugitive particulate emissions from the collection and transferring of collected wood waste shall be controlled by complete enclosure.
 (9 VAC 5-20-110 (formerly Section 120-02-11) of State Regulations)
6. The approved fuel for the boiler is wood waste generated from the hardwood panel consolidation facility, excluding any wood which contains chemical treatments or paper or plastic laminates. A change in the fuel may require a permit to modify and operate.
 (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)
7. The diesel engine shall consume no more than 60,000 gallons of diesel fuel per year, calculated as the sum of each consecutive 12 month period.
 (9 VAC 5-80-40 F (formerly Sections 120-08-04 F) of State Regulations)