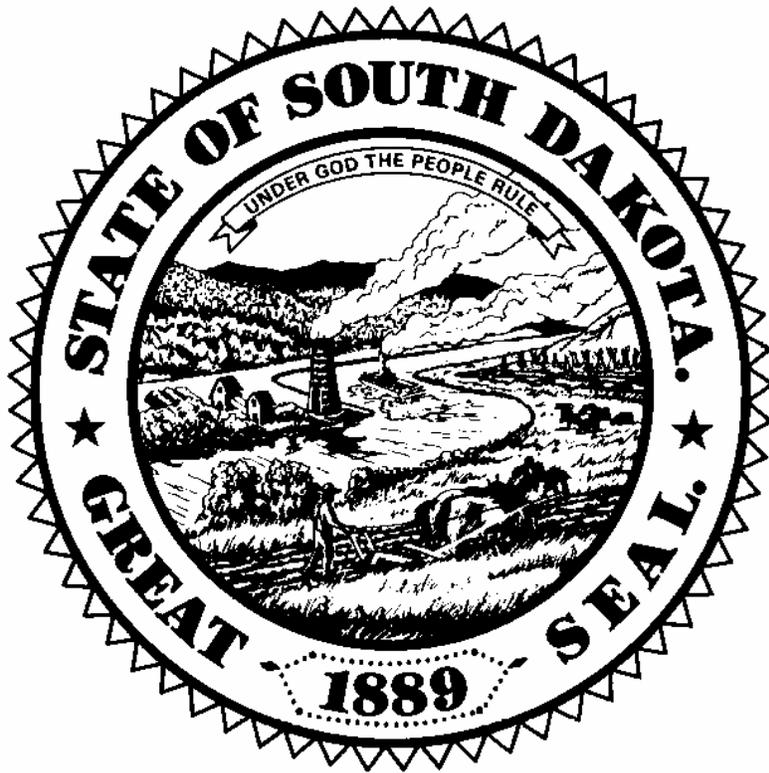


**SOUTH DAKOTA**

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



PART 70  
AIR QUALITY PERMIT TO OPERATE

MERILLAT INDUSTRIES  
#28.4428-02

**RECOMMENDATION FOR A PART 70 PERMIT TO OPERATE**

**Under the South Dakota Air Pollution  
Control Regulations**

**Pursuant to Chapter 34A-1-21 of the South Dakota Codified Laws, and the Air Pollution Control Regulations of the State of South Dakota, and in reliance on statements made by the owner designated below, the Department of Environment and Natural Resources issues a Part 70 Operating Permit to the owner to operate the source unit(s) at the location designated below and under the listed conditions:**

**Company name and Address:**

Merillat Corporation  
P.O. Box 4300  
4300 South Highway 79  
Rapid City, South Dakota 57709

**Legal location:** Tract 1, Merillat Subdivision, SW 1/4, Section 17, T1N, R8E,  
Pennington County

**Permit Number:** 28.4428-02

**AIRS Number:** SD 103 00010

**SIC Code(s):** 2491

**Type of Operation:** Particle Board Manufacturer

**Responsible Official:**

**Contact Person:**

Richard Krull, Plant Manager  
(605) 348-3900

Wayne Bunge, Plant Engineer  
(605) 348-3900

Issued by the Department of Environment and Natural Resources

**Date Permit Issued:** January 31, 2000

**Date Permit Expired:** January 31, 2005

**Nettie H. Myers, Secretary**



# Rapid City

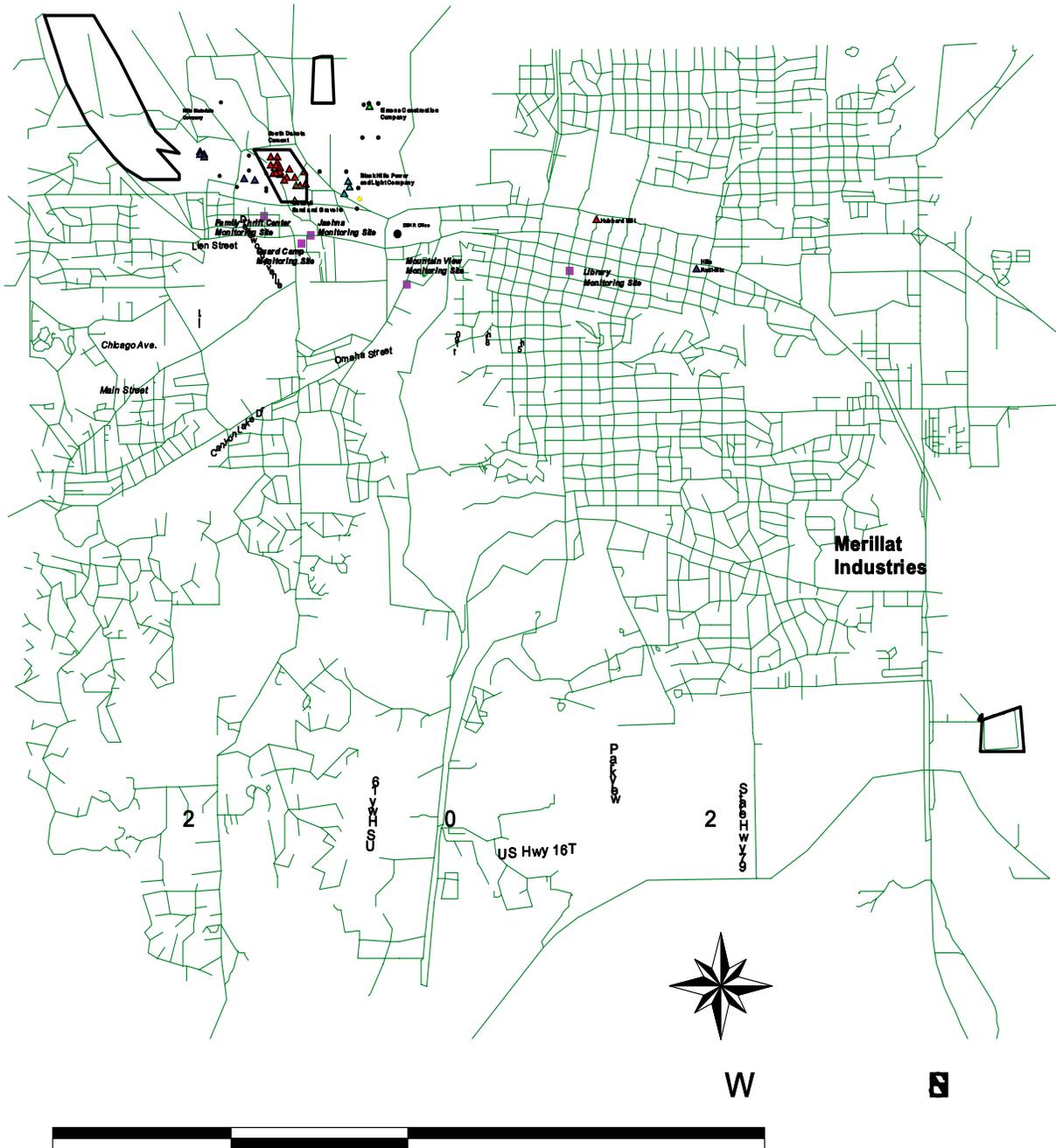


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## **1.0 GENERAL CONDITIONS**

**1.1 Operation of source.** The owner or operator shall operate the unit(s) according to the application received April 19, 1996, unless modified by the conditions of this permit. The application consists of the application forms, supporting data, and correspondence.

**1.2 Duty to comply.** In accordance with Administrative Rules of South Dakota (ARSD) 74:36:05:16.01(12), the owner or operator shall comply with all the conditions of this permit. A violation of any condition in this permit is grounds for enforcement, reopening this permit, permit termination, or denial of a permit renewal application. The owner or operator, in an enforcement action, cannot use the defense that it would have been necessary to cease or reduce the permitted activity to maintain compliance. This permit does not convey any property rights or any exclusive privilege. The owner or operator shall provide any information requested by the department to determine compliance or whether cause exists for reopening or terminating this permit.

**1.3 Inspection and entry.** The owner or operator, pursuant to SDCL 34A-1-41, shall allow the department to:

1. Enter the premises where a regulated activity is located or where pertinent records are stored;
2. Have access to and copy any records that are required under this permit;
3. Inspect operations regulated under this permit; or
4. Sample or monitor any substances or parameters regulated under this permit.

**1.4 Severability.** In accordance with ARSD 74:36:05:16.01(11), any portion of this permit that is void or challenged shall not affect the validity of the remaining permit requirements.

**1.5 Permit revision.** In accordance with ARSD 74:36:05:40, the department may reopen and revise this permit to meet requirements of SDCL 34A-1 or the federal Clean Air Act.

**1.6 Permit termination, modification, or revocation.** In accordance with ARSD 74:36:05:46, the department may recommend that the Board of Minerals and Environment terminate, modify, or revoke this permit for violations of SDCL 34A-1, the federal Clean Air Act, or for nonpayment of any outstanding fee or enforcement penalty.

## **2.0 PERMIT FEES**

**2.1 Annual air fee required.** In accordance with ARSD 74:36:05:06.01, the owner or operator shall submit an annual administrative fee and an annual fee. The fee is based on actual emissions in accordance with ARSD 74:37.

**2.2 Annual operational report.** In accordance with ARSD 74:37:01:06, the department will supply the owner or operator with an annual operational report in January of each year. The owner or operator shall complete and submit the operational report to the department by March 1 of each year. The operational report must be signed by the owner or operator in the presence of a notary public.

**2.3 Annual air fee.** In accordance with ARSD 74:37:01:08, the department will notify the owner or operator of the required annual air emission fee and administrative fee by June 1 of each year. The fees shall accrue on July 1 and are payable to the Department of Revenue by July 31 of each year.

## **3.0 PERMIT AMENDMENT AND MODIFICATION CONDITIONS**

**3.1 Permit flexibility.** In accordance with ARSD 74:36:05:30, the owner or operator shall have the flexibility to make changes to the source during the term of this permit. The owner or operator shall provide the department written notice at least seven days in advance of the proposed change (NOTE: The department will forward a copy of the written notice to EPA). The written notice shall include a brief description of the change, the date on which the change is to occur, any change in emissions, and the proposed changes to this permit.

The department will notify the owner or operator whether the change is an administrative permit amendment, a minor permit amendment, or a permit modification. A proposed change that is considered an administrative permit amendment or a minor permit amendment can be completed immediately after the department receives the written notification. The owner or operator must comply with both the applicable requirements governing the change and the proposed permit terms and conditions until the department takes final action on the proposed change.

A proposed change that is considered a modification can not be completed until the department takes final action on the proposed change. Permit modifications are subject to the same

procedural requirements, including public comment, as the original permit issuance except that the required review shall cover only the proposed changes.

**3.2 Administrative permit amendment.** In accordance with ARSD 74:36:05:33, the department has 60 days from receipt of a written notice to verify that the proposed change is an administrative permit amendment. The department considers a proposed change an administrative permit amendment if the proposed change accomplishes one of the following:

1. Corrects typographical errors;
2. Changes the name, address, or phone number of any person identified in this permit or provides a similar minor administrative change at the source;
3. Requires more frequent monitoring or reporting by the source;
4. The ownership or operational control of a source changes and the department determines that no other change in this permit is necessary. However, the new owner must submit a certification of applicant form and a written statement specifying the date for transfer of operating permit responsibility, coverage, and liability; or
5. Any other change that the department determines to be similar to those requirements in this condition.

**3.3 Minor permit amendment.** In accordance with ARSD 74:36:05:38, the department has 90 days from receipt of a written notice or 15 days after the end of EPA's 45-day review period, whichever is later, to take final action on a minor permit amendment. Final action consists of issuing or denying a minor permit amendment or determining that the proposed change is a permit modification. The department considers a proposed change to be a minor permit amendment if the proposed change:

1. Does not violate any applicable requirements;
- 2.. Does not involve significant changes to existing monitoring, reporting, or record keeping requirements;
3. Does not require or change a case-by-case determination of an emission limit or other standard, a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis; or
4. Does not seek to establish or change a permit term or condition for which the source has assumed to avoid an applicable requirement, a federally enforceable emission cap, or an alternative emission limit. An alternative emission limit is approved pursuant to regulations promulgated under section 112(I)(5) of the federal Clean Air Act.

**3.4 Permit modification.** In accordance with ARSD 74:36:05:39, an owner or operator may apply for a permit modification. A permit modification is any proposed change that is not an administrative amendment or a minor permit amendment. Permit modifications are subject to the same procedural requirements, including public comment, as the original permit issuance except that the required review shall cover only the proposed changes.

**3.5 Testing new fuels or raw materials.** In accordance with ARSD 74:36:11:04, an owner or operator may request permission to test a new fuel or raw material to determine if it is compatible with existing equipment before requesting a permit amendment or modification. A complete test proposal shall consist of the following:

1. A written proposal that describes the new fuel or raw material, operating parameters, and parameters that will be monitored and any testing associated with air pollutant emissions during the test;
2. An estimate of the type and amount of regulated air pollutant emissions that will result from the proposed change; and
3. The proposed schedule for conducting the test.

The department shall approve, conditionally approve, or deny in writing the test proposal within 45 days after receiving a complete proposal. Approval conditions may include changing the test schedule or pollutant sampling and analysis methods. Pollutant sampling and analysis methods may include, but are not limited to performance testing, visible emission evaluation, fuel analysis, dispersion modeling, and monitoring of raw material or fuel rates.

If the department determines that the proposed change will result in an increase in the emission of a regulated air pollutant or result in the emission of an additional regulated air pollutant, the department shall give public notice of the proposed test for 30 days. The department shall consider all comments received during the 30-day public comment period before making a final decision on the test.

#### **4.0 PERMIT RENEWAL REQUIREMENTS**

**4.1 Permit effective.** In accordance with ARSD 74:36:05:07, this permit shall expire five (5) years from date of issuance unless reopened or terminated for cause.

**4.2 Permit renewal.** In accordance with ARSD 74:36:05:08, the submittal of an application for a permit renewal is timely if submitted six months before the date of permit expiration. The current permit shall not expire and shall remain in effect until the department takes final action on the timely permit renewal application.

**4.3 Permit expiration.** In accordance with ARSD 74:36:05:28, permit expiration terminates the owner's or operator's right to operate any unit covered by this permit.

## **5.0 RECORD KEEPING AND REPORTING REQUIREMENTS**

**5.1 Retention of records.** In accordance with ARSD 74:36:05:16.01(9), all records and pertinent information specified by this permit shall be maintained for five (5) years from the date of sample, measurement, report, or application and made available to the department for inspection.

**5.2 Annual compliance certification.** In accordance with ARSD 74:36:05:16.01(14), the owner or operator shall submit an annual compliance certification letter to this department by March 1 of each year this permit is in effect (NOTE: The department will forward a copy of the certification letter to EPA). The certification shall contain the following information:

1. Methods used to determine compliance, including: monitoring, record keeping, performance testing and reporting requirements;
2. The source is in compliance and will continue to demonstrate compliance with all applicable requirements; and
3. In the event the source is in noncompliance, a compliance plan that indicates how the source has or will be brought into compliance.

**5.3 Certification statement.** Any person signing a document under this section shall make the following certification statement:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

**5.4 Reporting permit violations.** In accordance with ARSD 74:36:05:16.01(9), the owner or operator shall report all permit violations. A permit violation should be reported as soon as possible but no later than the first business day following the day the violation was discovered. The permit violation may be reported by telephone to the South Dakota Department of Environment and Natural Resources at (605) 773-3351 or by FAX at (605) 773-5286. A written report, describing the permit violation and how compliance will be achieved, shall be submitted to the department within 30 days of discovering the permit violation.

**5.5 Source monitoring.** The owner or operator shall conduct a visual observation for all of the point sources listed in the permit at least once per month or install continuous opacity monitors

on each unit. The owner or operator shall record the inlet and outlet temperatures for sources 003, 004, 005, 006, 008, 009, and 010 corresponding with the opacity readings.

With the use of wood as a fuel source, the inlet temperature for sources 003, 004, 005, and 006 shall be continuously monitored and shall not exceed 750 degrees Fahrenheit for sources 003 and 004.

**5.6 Source recordkeeping and reporting.** The visual observations, inlet and outlet temperatures referenced in section 5.5 shall be recorded and filed and will be made available to the department upon request or during inspections. The continuous inlet temperature charts for each pre-dryer shall be maintained for three years and made available to the department for inspection.

**5.7 Maintenance Log.** The owner or operator shall maintain a maintenance log for the units and pollution control equipment in section 6.0. The maintenance log shall be made available to the department upon request. The maintenance shall include the date, time and type of maintenance.

**5.8 Rapid City Annual Emissions Inventory.** The owner or operator shall submit an annual emissions inventory report to the department for point and fugitive dust sources by March 1 on an annual basis.

**5.9 Emissions By-passes.** The owner or operator shall report emission by-passes to the department within 24 hours of occurrence. A quarterly report shall be submitted to the department summarizing the by-passes. Both reports shall contain the cause of the by-pass, the duration of by-pass, and the action taken to remedy the by-pass. If no by-passes occur during the quarter, a report will not be required.

## **6.0 CONTROL OF REGULATED AIR POLLUTANTS**

**6.1 Visibility limit.** In accordance with ARSD 74:36:12:01, Merrillat may not discharge into the ambient air from any permitted unit an air contaminant of a density equal to or greater than that designated as 20 percent opacity. This provision does not apply when the presence of uncombined water is the only reason for failure to meet the requirement.

**6.2 Visibility exceedances.** In accordance with ARSD 74:36:12:01, an exceedance from the operating limit in permit condition 6.1 is not considered a violation during soot blowing, start-up, shutdown, or malfunctions. A malfunction is defined in ARSD 74:36:01:01(38). A malfunction is described as any sudden and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. A failure caused entirely or in part by poor maintenance, careless operation, preventable equipment breakdown, or any other cause within the control of the owner or operator of the source is not a malfunction and is considered a violation.

**6.3 Particulate matter limits.** In accordance with ARSD 74:36:06:02(1) and/or ARSD

74:36:06:03(1), Merillat may not allow the emission of particulate matter in excess as identified for each unit.

**6.4 Sulfur dioxide limits.** In accordance with ARSD 74:36:06:02(2) and /or ARSD 74:36:06:03(2), Merillat may not allow the emissions of sulfur dioxide to the ambient air in an amount greater than 3 pounds of sulfur dioxide per hour per million Btu of heat input to the unit.

**6.5 Air emission exceedances - emergency conditions.** In accordance with ARSD 74:36:05:16.01(18), the Merillat may exceed a technology-based emission limit if the exceedance is caused by an emergency condition and immediate action is taken by Merillat to restore the operations back to normal. An emergency condition is a situation arising from a sudden and reasonably unforeseeable event beyond the control of the source, including acts of God. An emergency shall not include an emission exceedance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. The owner or operator shall notify the department within two working days of the incident and take all steps possible to eliminate the excess emissions.

**6.6 Circumvention not allowed.** In accordance with ARSD 74:36:05:47.01, Merillat may not install, use a device, or use a means that conceals or dilutes an air emission that would otherwise violate this permit. This includes operating a unit or control device that emits air pollutants from an opening other than the designed stack, vent, or equivalent opening.

**6.7 Minimizing emissions.** Merillat shall at all times, when practicable, maintain and operate all permitted units in a manner that minimizes air pollution emissions.

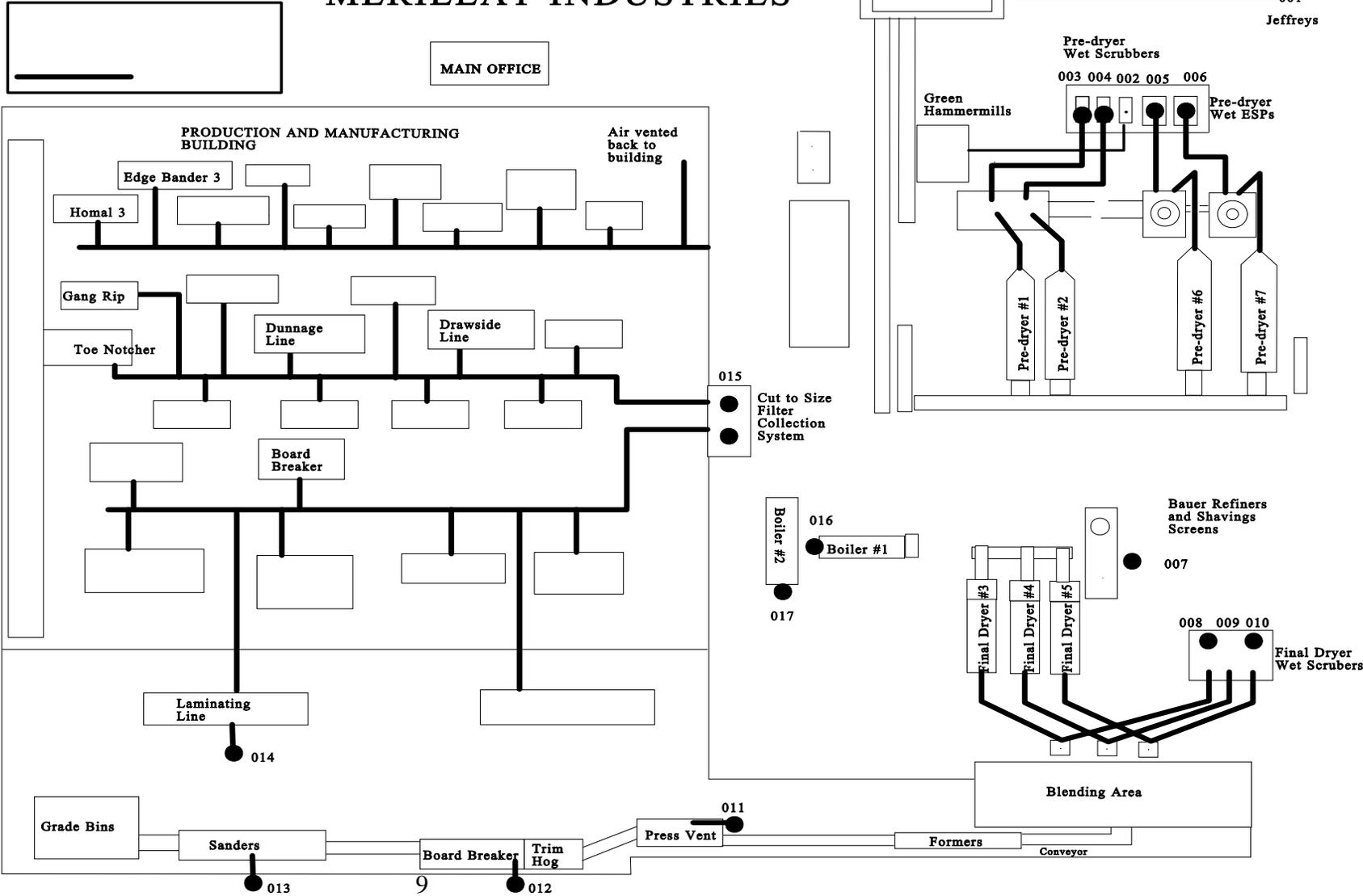
**6.8 Source controls and operating parameters.** Merillat shall not operate these units greater than 10 percent above the operating rate established during the last stack test. Air pollutants generated from each unit shall be discharged to the ambient air through the air pollution control device or the unit's stack, vent or equivalent opening. Merillat shall not discharge into the atmosphere from these units emissions greater than the allowable emissions listed for each source. The applicable regulations to each requirement is listed below:

1. ARSD 74:36:07:20 (40 CFR 60.382) - Allowable emissions and opacity limitations.
2. ARSD 74:36:06:03(1)(a) and (2) - Allowable emissions for process units.

The operating parameters for the air pollution control devices in this permit are not enforceable or consider to be operating rates or emission limitations. They were included in this permit to assist the inspector in the field to observe deviations from baseline operating parameters during inspections.



# MERILLAT INDUSTRIES



001 Source: Jeffrey Hammermill  
Control: Enclosed ducts and hood

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)
	20%	17.54	8.75

002 Source: Green hammermills  
Control: 1997 Clarks Sheet Metal - cyclonic wet scrubber

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)	Operating Design (ton/hour)
	20%	18.87	9.69	25

003 Source: 1989 Westec - Pre-Dryer #1 (wood/natural gas)  
Control: 1994 Clarks Sheet Metal - cyclonic wet scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)
	20%	3	7.06	3.6

004 Source: 1989 Westec - Pre-Dryer #2  
Control: 1986 Clarks Sheet Wet Scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)
	20%	3	7.06	3.6

005 Source: 1986 MEC Pre-Dryer #6 (wood/natural gas)  
Control: 1992 Geo-Energy Corp. - Wet ESP

Source	Opacity (point	SO2 Allowable	Particulate Allowable	Operating Rate	Operating Design

Standards	source)	(lbs/mmbtu)	(lbs/hour)	material feed (ton/hour)	(ton/hour)
	20%	3	15.82	9.04	12.5

006 Source: 1986 MEC Pre-Dryer #7 (wood/natural gas)  
Control: 1992 Wet ESP

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)	Operating Design (ton/hour)
	20%	3	15.82	9.04	12.5

007 Source: Dry Refiners and Shaving Screens  
Control: 1986 Clarke's Pneu-Aire 100-20-GI Baghouse

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)	Operating Design (ton/hour)
	20%	36.21	25.85	8.5

008 Source: 1997 Westec - Final Dryer #3 (wood/natural gas)  
Control: 1994 Clarks Sheet Metal - cyclonic wet scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)	Operating Design (ton/hour)
	20%	3	16.68	8.25	8.5

009 Source: 1989 Westec - Final Dryer #4 (wood/natural gas)  
Control: 1994 Clarks Sheet Metal - cyclonic wet scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)
	20%	3	16.68	8.25

010 Source: 1989 Westec - Final Dryer #5 (wood/natural gas)  
Control: 1994 Clarks Sheet Metal - cyclonic wet scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate material feed (ton/hour)
	20%	3	16.68	8.25

011 Source: 1983 Washington Iron Works Particle Board Press Vent  
Control: No Control

Source Standards	Opacity (point source)	Operating Rate (mm board feet/year)	Heat input (mmbtu/hour)
	20%	100	12

012 Source: Boarderline Saws and Trim Breaker  
Control: 1970 Carter Day Filter baghouse

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)
	20%	7.58	2.5

013 Source: OSUS- Nova Ulrich Steineman sanders  
Control: 1992 Clarke's Pneu-Air Filter baghouse

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)
	20%	10.81	4.25

014 Source: Laminating Line  
Control: No Control

Source Standards	Opacity (point source)	Operating Design (meters/min)	VOC (lbs/ton)

	source)	ute)	
	20%	40	to be determined

015 Source: Cut to size systems  
Control: 1985 Clarke's Pneu-Air Filter baghouse (3)

Source Standards	Opacity (point source)	Particulate Allowable (lbs/hour)	Operating Rate (ton/hour)	Operating Rate (cabinet/day)	Operating Design (cabinet/day)
	20%	8.17	2.8	16000	22500

016 Source: 1981/86 Babcock-Wilcox/ Coen boiler (wood/natural gas)  
Control: 1983 Zurn Cyclone/1970 LP wet scrubber

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour) wood/natural gas	Operating Rate (mmbtu/hr)
	20%	3	.49/1.35	75 (80% capacity)

017 Source: Cleaver Brooks back-up boiler  
Control: no controls

Source Standards	Opacity (point source)	SO2 Allowable (lbs/mmbtu)	Particulate Allowable (lbs/hour)	Operating Rate (mmbtu/hr)
	20%	3	1.21	22 (75% capacity)

## 7.0 PERFORMANCE TESTS

**7.1 Performance test may be required.** In accordance with ARSD 74:36:11:02, the secretary may request a stack performance test. The stack performance test results shall be submitted to the department within 60 days after completing the stack performance test or as designated by the department.

**7.2 Testing methods and procedures.** The owner or operator shall conduct the stack test in accordance with 40 C.F.R Part 60, Appendix A, unless prior approval is obtained from the department. The operation of the unit will be restricted to the maximum rate operated during the stack test if operations are less than 90 percent of the maximum design capacity.

**7.3 Submittal of test plan.** In accordance with ARSD 74:36:11:01, the owner or operator shall submit the proposed stack test procedures to the department at least 30 days before any stack performance test. The department will notify the owner or operator if the proposed stack test procedures are approved or denied. If the proposed stack test procedures are denied, the department will provide written notification that outlines what needs to be completed for approval.

**7.4 Notification of test.** In accordance with ARSD 74:36:11:03, the owner or operator shall notify the department at least 10 days before the start of a stack performance test to arrange for an agreeable test date when a department representative may observe the test.

**7.5 Source Testing.** The owner or operator shall conduct a stack performance test for particulates, sulfur dioxide, nitrogen oxides and volatile organic chemicals prior to expiration of this permit for sources 003 (or 004), 005 (or 006) and 008 (or 009, 010). In the event source 003 or 004 are operated less than an average of less than 100 hours/year for the duration of this permit, a test will not be required.

## **8.0 ALTERNATIVE OPERATING SCENARIO**

**8.1 Sanderdust as fuel source:** Merillat has identified the following alternative operating scenario for their operations. They have requested to use sanderdust as their main source of fuel in the event of a natural gas curtailment or other natural gas interruption beyond the control of Merillat. This scenario will not allow for the use of sanderdust because of natural gas price increases.

The department will allow the alternative operating scenario under the following conditions:

1. Merillat shall only be allowed to burn sanderdust as a fuel in the event of a natural gas curtailment or a disruption of service of natural gas beyond its control. This will not include price increases of natural gas;
2. Merillat shall convert back to natural gas when the natural gas curtailment is discontinued or when the disruption of service of natural gas has been corrected;
3. Upon completion of one year of monitoring for nitrogen oxides and ozone monitoring, Merillat shall submit a report to the department identifying ambient air quality impacts to the surrounding 10 miles areas from the facility for these pollutants. This can be achieved by, but not limited to, conducting an air dispersion modeling analysis for nitrogen oxides emitted from Merillat and providing a comparison with the monitoring data collected. There is not a model developed for VOC's. Therefore, an alternative method will need to be devised to evaluate this

air pollutants impacts ; and

4. The following emission limits, monitoring and reporting requirements shall be in effect when Merrillat is using sanderdust as a fuel:

a. Merrillat shall comply with the emission limits for particulate matter and sulfur dioxide in ARSD 74:36:06;

b. Merrillat shall not emit greater than 249 tons/year of volatile organic compounds or nitrogen oxides during any 12 month period. This standard will be based upon a 12 month rolling total. When the 249 tons/year amount for either air pollutant is exceeded, Merrillat will cease operations until they can remain under the allocated 249 tons/year pollutant level for a 12 month rolling total or will have completed a PSD review for the air pollutant exceeded;

c. While burning sanderdust as the fuel, Merrillat shall submit a monthly report to the department identifying the previous 12 month total of emissions for VOC's and nitrogen oxides. The report will be based upon actual operating hours. The report will include the units emitting these pollutants, the emission rate for each unit, the number of hours operated per month for each unit, the total amount of emissions per unit for each air pollutant and the total emissions for each unit for the facility. The Excel emission calculation spreadsheet designed to perform the 12 month rolling total is included in Attachment A. It identifies the units and emission factors for each unit while burning sanderdust or natural gas; and

d. While burning sanderdust as the fuel, Merrillat shall not exceed 20 percent opacity on emissions for any unit.

## **9.0 MACT STANDARD**

**9.1 MACT Standard.** The Environmental Protection Agency has set a date for the promulgation of a Maximum Available Control Technology standard for hazardous air pollutants for the particle board industry. At the time the standard(s) for these pollutants are finalized, it shall be incorporated into this permit.

**Attachment A**

Calculation Spreadsheet and Emission Factors for Alternative Operating Scenario  
(Converting back to Sanderdust - 12 month rolling total)