

April 29, 1996

Mr. Larry Devillier
Air Quality Division
Louisiana Department of Environmental Quality
P.O. Box 82135
Baton Rouge, Louisiana

Re: Forest Products Industry
Permitting Information

Dear Mr. Devillier:

Since the start of the forest products initiative by the Environmental Protection Agency (EPA) in 1993, we have reviewed several forest products industry permit applications and draft permits which were processed by the Louisiana Department of Environmental Quality (LDEQ) for processing. The forest products initiative includes types of facilities described as: oriented strandboard, medium density fiberboard, plywood, and particleboard. In order to be of further assistance to the LDEQ in the permitting process, generally recurring items of concern which Region 6 has noted when reviewing these types of permit actions are itemized below for your information and reference as follows.

Experience with recent permit applications indicate that the use of emission factors which presently exist in AP-42, Chapter 10, as of 1980, do not generally represent the actual emissions from these types of facilities. Recent permitting information in Region 6, and other Regions, indicates that actual emissions from certain facilities may be significantly higher than those represented in the permit application. The permit application, and the public record, should document that the emissions represented in the application reflect the actual potential to emit.

In the case where an applicant uses actual emissions tests to document the actual emissions from a source, the public record should address that the applicant used the appropriate test methods, or EPA approved alternative or equivalent test methods, operating parameters, and air pollution equipment, during the tests. Any permit issued by the State should reflect operating conditions which are consistent with emissions tests, including production parameters which reflect the actual conditions of the tests. For example, the types and usage of raw materials, the production parameters, etc. being used during normal day-to-day operating conditions should be consistent with the stack test conditions.

The permit should include conditions to verify compliance with the terms and conditions of such permit. This includes a condition

that the permit applicant demonstrate compliance with permit emission limits at the applicable emission point(s); e.g., the veneer dryers and the presses emission points. The applicant should verify the emissions using the reference methods in 40 CFR Part 60, Appendix A, for other alternative or equivalent methods approved by EPA. The applicant should initially demonstrate compliance within 180 days of start-up. Further, the permitting authority should re-open the permit if the initial compliance tests document emissions which are higher than those represented in the application.

The permit applicant should consider all control technology currently available at the time of submission of the permit application. The application of Best Available Control Technology (BACT) to control criteria pollutant emissions, particularly of volatile organic compounds (VOC) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), from the veneer dryers and presses should address the control technology known as regenerative thermal oxidation (RTO) or regenerative catalytic oxidization (RCO), or equivalent technology, in addition to other demonstrated control technologies identified by the source, State, and public.

We hope this information assists your permitting program. If you have any questions, please call Mr. Richard A. Barrett of my staff at (214-665-7227).

Sincerely yours,
ORIGINAL SIGNED BY
JOLE C. LUEHRS

Jole C. Luehrs
Chief
Air Permits Section (6PD-R)