DRAFT/PROPOSED

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM **March 9, 2021**

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Richard Groshong, Env. Programs Manager, Compliance & Enforcement

THROUGH: Eric L. Milligan, P.E., Manager, Engineering Section

THROUGH: Joseph K. Wills, P.E., Engineering Section

FROM: Ryan Buntyn, P.E., Existing Source Permits Section

SUBJECT: Evaluation of Permit Application No. **93-065-C (M-16)**
Georgia-Pacific Gypsum, LLC
Fletcher Gypsum Wallboard Plant (SIC 3275/NAICS 327420)
Facility ID: 1494
Section 11, Township 4N, Range 10W, Comanche County, Oklahoma
Latitude 34.83993°N, Longitude 98.22983°W
From Fletcher, Oklahoma, travel one (1.0) mile north on US-277, travel one-half (0.5) mile east on King Road, and facility will be to the south.

SECTION I. INTRODUCTION

Georgia-Pacific Gypsum, LLC (GP) has requested a major source construction permit for their Gypsum Wallboard Plant in Fletcher, Oklahoma. The Fletcher Gypsum Wallboard Plant is currently operating under Permit No. 93-065-O (M-13) issued on September 20, 2019, construction Permit No. 93-065-C (M-15) issued on August 18, 2020, and construction Permit No 93-065-C (M-17) issued on September 30, 2020. Permit No. 93-065-O (M-13) was a minor modification authorizing the instillation of ENG1 and the pre-gelatinized starch (PGS) delivery system. Permit No 93-065-C (M-15) was issued to update emissions from the wallboard dryer based on new stack testing. Permit No 93-065-C (M-17) was an administrative amendment to Permit No 93-065-C (M-15). This project will add production of a new wallboard type and a new paint line and is technically independent from these modifications. This construction permit will convert the facility from a synthetic-minor facility to a major source.

GP is proposing to modify or install several emission units as part of the drying and finishing processes at the Fletcher Plant. The plant will continue to manufacture regular, wax and silicone board consistent with current operations, but with the proposed project the plant will add fiberglass mat wallboard into the product mix. Several physical changes are required in order for the Fletcher Plant to begin manufacturing the new fiberglass mat product. Additionally, GP is proposing to install a new Paint Line. The Paint Line will consist of all new equipment and will be a stand-alone process for finishing certain fiberglass mat wallboard products. The following table shows which emission sources are affected by this project.

EU ID	Source	New or Modified
DRA-204	Wet End Dust Collector	New
DRYER	Wallboard Dryer	Modified
DRA-205	Dry End Dust Collector	New
DRA-200	Edge Trim Baghouse	Modified
DRA-250	Sleutter Machine Baghouse	Modified
FUG	End Spray Application	New
FUG	Haul Roads	Modified
New Paint Line Equipment		
PL-100	Paint Line Board Intake Baghouse	New
PL-101	In-Line Saw Baghouse	New
PL-203A	Paint Line Preheater	New
PL-203B	Paint Line Oven #1	New
PL-203C	Paint Line Oven#2	New
FUG	Paint Line Coater	New
FUG	Ink Jet Application VOC Emissions	New
FUG	Ink Jet Cleaner VOC Emissions	New

With these modifications, this facility will become a major source of CO, PM_{10} and $PM_{2.5}$.

SECTION II. PROCESS DESCRIPTION

The specific operations used to manufacture gypsum wallboard include gypsum handling, calcining, blending and forming, drying and cooling, and bundling which are described below:

a. Gypsum Handling - Fine raw gypsum rock is received at the Fletcher Plant from local mines via tarped trucks. The gypsum rock ($CaSO_4 + 2H_2O$) is drop loaded from the trucks into a track hopper contained inside the enclosed Rock Unload Shed, picked up by a conveyor, and transferred into the enclosed Rock Storage Shed by the Rock Incline Belt and Shuttle Belt.

Gypsum is retrieved from the Rock Storage Shed by front-end loader and fed into the process via the Rock Hopper where the material is fed via the Cal Pit elevator into the Rock Shaker Screen to segregate larger sized material from material that is less than 0.25 inches. Material that is greater than 0.25 inches is sent to the Rock Hammermill for crushing before being blended with the main material stream for transport to the calciners. This process is completely enclosed except for the front-end loader transport operations.

b. Calcining - The material is fed into one of three natural gas-fired calciner/milling systems where it is flash calcined and reduced down to a very small particle size. The material is now called stucco ($CaSO_4 + ½H_2O$). Each of the calciners is controlled by a baghouse (BH-127, BH-129, and BH-130) and has a 25 MMBtu/hr natural gas-fired burner. All three calciners operate simultaneously year-round and all three natural gas-fired burners are fired continuously when the calcine mills are in operation. An air-cooled Stucco Cooler allows moisture to dissipate before going to the Stucco Bins. Emissions from the Stucco Cooler are controlled by the Stucco Cooler Baghouse (DC-170).

The stucco is pneumatically and mechanically conveyed to the stucco bins with the separated exhaust/conveying air passing through a cyclone and a bag filter for dust control and additional stucco collection. The stucco bins are under negative pressure with all exhaust air vented through the Stucco Storage Baghouse (CBE-7907).

c. Blending and Forming - Stucco is withdrawn from the stucco bins and is transferred via the Weigh Bin and Weigh Belt to the pin mixer in the blending area, where it is mixed with starch, ball mill additive (BMA), vermiculite, glass fibers, water and/or other additives depending on the grade of board being manufactured.

Starch is stored in the 200,000-lb Starch Storage Silo and transferred to the blending area via the Starch Transport System. Emissions from the Starch Storage Silo are controlled by the Starch Silo Baghouse (DV-007). Emissions from the Starch Transport System will be controlled by the Starch Transport Bin Vent. A pre-gelatinized starch (PGS) delivery system, consisting of a bulk bag unloader and a vacuum conveyor system, unloads 2,000-lb bags of PGS and transports the starch to the starch feed system which in turn delivers the starch to the pin mixer. The bulk bag unloader has a dust collector to capture fugitive emissions.

BMA is raw gypsum [land plaster (LP)] that is combined with sugar and crushed in either the North or South Ball Mill. The sugar is fed from a bulk bag via a bucket elevator into a sugar feeder which in turn feeds the sugar to the ball mill feed screw. The raw gypsum is fed into the LP Feed Hopper via front-end loader. The material is further processed by the LP Hammermill and stored in the LP Collection Bin. Emissions for the LP Hammermill and LP Collection Bin are controlled by the LP Baghouse that vents inside the Calcine Building. The material is fed through the LP Feeder Bin to the ball mill feed screw that in turn feeds either the North or South Ball Mill. Emissions from the LP Feeder Bin are controlled by the LP Feeder Baghouse that vents inside the BMA Building. The finished BMA is then pneumatically conveyed from the ball mills to the BMA Day Tank for use in the process.

Emissions from the pin mixer and the dry additives screw conveyors are controlled by the Area Baghouse (BCA-500). Additional wet and dry additives are introduced in the wet mixer.

The slurry of plaster and additives blended in the pin mixer is delivered onto a moving sheet of substrate in the forming area. An additional roll of substrate adds a second covering to the top side forming the basic gypsum wallboard in a continuous strip. Substrate facing materials may vary depending on specific wallboard products.

With the proposed project, GP will install a vacuum system and associated Wet End Dust Collector (proposed Source ID DRA-204) to the substrate unwinding area to collect fugitive dust build up that may occur from fiberglass mat unwinding. The unwinding of fiberglass mat substrate is not an emission source, but dust from the glass mat fibers can occasionally build up from unwinding the fiberglass mat. As such, the vacuum system and associated dust collector will operate as needed for housekeeping purposes when dust builds up in the unwinding area.

After the board is formed, it is conveyed down a several hundred foot long carrier belt to allow time for curing of the plaster to its initial set. Knives cut the continuous board to length. The wet

transfer system accelerates the board through a right angle transfer station, inverts each board and pairs it face up for delivery to the dryer.

Wet waste wallboard is transferred to the Waste Wallboard Pile and is eventually sent to the landfill or to the Recycle Bunker Feed that feeds waste wallboard to the Norba Crusher and the Recycle Hammermill that crush the material prior to it being returned to the Rock Storage Shed via the Recycle Bucket Elevator.

d. Drying and Cooling - The Wallboard Dryer is a three-zone, direct heated drying tunnel through which the board is conveyed by chains and rollers. The dryer has three natural gas-fired burners. The dryer will be modified to replace the existing 85 MMBtu/hr burners with new burners with a total rated capacity of 118 MMBtu/hr. Emissions from the dryer are exhausted through a powered exhaust stack, a wet end seal stack, and a dry end seal stack. Upon exiting the dryer, additional conveying allows for cooling of the board before the finishing stage. Reject board from the dryers is transferred to the Waste Wallboard Pile and is ultimately sent to either the landfill or the Norba Crusher and the Recycle Hammermill that crush the material prior to it being returned to the Rock Storage Shed.

e. Finishing - The boards are first trimmed by the East or West End Saw and are then cross-transferred and stacked. The proposed project will install a center cut saw and a 4x4 saw for cutting specific product types. Board trim from the End Saws is transferred to the Recycle Bunker Feed and is ultimately sent to either the landfill or the Norba Crusher and the Recycle Hammermill that crush the material prior to it being returned to the Rock Storage Shed. With the proposed project, dust from the End Saws and proposed center cut saw and 4x4 saw will be collected and routed to the existing North Edge Trim Baghouse (DRA-200) or will be replaced with a new baghouse of similar size. The board ends are taped for sealing and bundled together for shipping. An automatic stacker arranges the bundles of boards for storage or shipping.

The finishing area also includes the production of sleuters (or risers), which are 4-inch wide strips of board used as spacers between units of finished wallboard. The dust from sawing and stacking risers will be collected and routed to the South Edge Trim Baghouse (DRA-250), to be renamed as the Sleutter Machine Baghouse. Some dust settles on the production building floor and is periodically swept up for disposal.

f. Paint Line - The Paint Line will consist of all new equipment and will be a stand-alone process for finishing certain fiberglass mat wallboard products. Fiberglass mat wallboard to be finished by the Paint Line will enter through the Board Intake equipped with dust collector (proposed Source ID PL-100). The dust collector will collect fugitive dust on the board and will exhaust inside the building. The wallboard will enter a Paint Line Pre-Heater equipped with a natural gas-fired burner with a rated capacity of 1.34 MMBtu/hr (proposed Source ID PL-203A) where it will be heated prior to entering Paint Line Coater #1. The Paint Line Coater will apply paint to the entire face of the board via a coater roller. The board will subsequently enter Paint Line Oven #1 (proposed Source ID PL-203B) equipped with a natural gas-fired burner with a rated capacity of 2.10 MMBtu/hr to dry the paint. The board will then enter Paint Line Coater #2 where a second coat of paint is applied. The wallboard will then be dried in Paint Line Oven #2 (proposed Source ID PL-203C) equipped with a natural gas-fired burner with a rated capacity of 2.10 MMBtu/hr. The board will then enter a cooler to ensure the

paint is fully dry. An inkjet printer will print a time stamp and product specifications directly onto the dry board. Finally, a portion of the board will be cut to size by the In-Line Saw depending on product specifications. Dust generated by the In-Line Saw will be collected by a dust collector (proposed Source ID PL-101) which will exhaust outside the building. Finished wallboard will be stacked and stored in the warehouse prior to offsite shipment.

g. Storage Tanks - Fuel storage operations include diesel and gasoline storing and dispensing. These fuels are used in plant mobile equipment. Tank storage operations also include the dry and wet additives used in the stucco blending operations. All of these storage tanks are fixed roof atmospheric tanks.

h. Plant Roads – The facility consists of a mix of paved and unpaved roads.

i. Generators - Two generators are on-site for emergency situations.

SECTION III EQUIPMENT

EUG A GYPSUM HANDLING

EU ID	Source	Capacity	Construction Date
UNLOAD	Truck Unloading	70 TPH	N/A
HOP1	Rock Hopper	70 TPH	2009
HOP2	Land Plaster Feed Hopper	0.65 TPH	2009
BIN1	Counterweight Collection Bin	0.001 TPH	2009
BELT1	Rock Incline Belt	70 TPH	2009
BELT2	Shuttle Belt	70 TPH	2009

EUG B CALCINING

EU ID	Source	Capacity	Construction Date
BH-127	#1 Calciner	25-MMBTUH	Before 4/1986
BH-129	#2 Calciner	25-MMBTUH	Before 4/1986
BH-130	#3 Calciner	25-MMBTUH	Before 4/1986
ELVTR1	Calcine Pit Elevator	70 TPH	1987
SCREEN1	Rock Shaker Screen	70 TPH	Before 4/1986
HAMER1	Rock Hammermill	70 TPH	Before 4/1986

EUG C STUCCO COOLING

EU ID	Source	Capacity	Construction Date
DC-170	Stucco Cooler Baghouse	N/A	2009
CBE-7907	Stucco Storage Baghouse	N/A	2009
CBE-7907	Stucco Bin #1	N/A	Before 4/1986
CBE-7907	Stucco Bin #2	N/A	Before 4/1986
CBE-7907	Stucco Bin #3	N/A	Before 4/1986
ELVTR2	Stucco Loading Elevator	70 TPH	2009
ELVTR3	Stucco Return Elevator	70 TPH	2009

EUG D BMA SYSTEM

EU ID	Source	Capacity	Construction Date
BH3	LP Baghouse	N/A	2000
BH3	LP Hammermill	N/A	2000
BH3	LP Collection Bin	N/A	2000
BH4	LP Feeder Bin Baghouse	N/A	2000
BH3	LP Feeder Bin	N/A	2000
VENT1	BMA Sugar Bin Vent	0.038 TPH	2000
MILL1	North Ball Mill/South Ball Mill	N/A	2000
TANK1	BMA Day Tank	N/A	2000

EUG E DELIVERY SYSTEMS

EU ID	Source	Capacity	Construction Date
DV-007	Starch Silo Baghouse	N/A	2017
VENT2	Starch Transport System Bin Vent	N/A	2017
BH6	PGS Delivery System Baghouse	N/A	2018
DV-007	Starch Storage Silo	N/A	Before 4/1986
VENT2	Starch Day Tank	N/A	Before 4/1986
VENT2	Starch Feed Hopper	N/A	Before 4/1986

EUG F DRY ADDITIVES AND WET END

EU ID	Source	Capacity	Construction Date
BCA-500	Area Baghouse	N/A	1993
BCA-500	Weigh Bin	N/A	Before 4/1986
BCA-500	Dry Additives Tank Feeder	N/A	Before 4/1986
BCA-500	Pin Mixer	N/A	Before 4/1986
VENT3	Sugar Bin Vent	N/A	2017
DRA-204	Wet End Forming Line Dust Collector	N/A	2021

EUG G WALLBOARD DRYER

EU ID	Source	Capacity	Construction Date
DRYER	Wallboard Dryer	118-MMBTUH 87 TPH 615,000 TPY	Mod. 2021

EUG H BOARD FINISHING

EU ID	Source	Capacity	Construction Date
DRA-200	Edge Trim Baghouse	N/A	Mod. 2021
DRA-250	Sleutter Machine Dust Collector	N/A	Mod. 2021
FUG	End Spray Application	75 MSF/hr	2021
DRA-205	Dry End Forming Line Dust Collector	N/A	2021

EUG I RECLAIM AND RECYCLE

EU ID	Source	Capacity	Construction Date
FUG	Waste Wallboard Pile	8 TPH	N/A
RCYL1	Recycle Bunker Feed	8 TPH	1993
CRUSH1	Norba Crusher	8 TPH	1993
RCYL2	Recycle Hammermill	8 TPH	2009
RCYL3	Recycle Bucket Elevator	8 TPH	2009

EUG J PAINT LINE

EU ID	Source	Capacity	Construction Date
PL-100	Board Intake Dust Collector	N/A	2021
PL-101	In-Line Saw Dust Collector	N/A	2021
PL-203A	Paint Line Pre-Heater	1.34-MMBTUH	2021
PL-203B	Paint Line Oven #1	2.10-MMBTUH	2021
PL-203C	Paint Line Oven #2	2.10-MMBTUH	2021
FUG1	Paint Line Coater	42-msf/hr	2021
FUG	Ink Jet Application VOC Emissions	42-msf/hr	2021
FUG	Ink Jet Cleaner VOC Emissions	42-msf/hr	2021

EUG K STORAGE TANKS

Tanks Contents	Capacity (gallons)
Liquid Soap	12,000
Dispersant	12,050
Wax Emulsion	12,155
Wax Emulsion	24,665
Unleaded Gasoline	125
Diesel	500

EUG L GENERATOR

EU ID	Source	Capacity	Construction Date
ENG1	Fire Water Pump Engine	190-hp	12/2017

EUG M HAUL ROADS

EU ID	Source	Capacity	Construction Date
FUG	Haul Roads	N/A	N/A

SECTION IV EMISSIONS

EUG A GYPSUM HANDLING

Gypsum handling includes all of the transfer points of raw gypsum from the time it is received until it is fed through the coarse screen and hammermill. This includes the transfers by front-end loader between the rock storage building and the Rock Hopper. The PM emission factor for these activities is based on Equation 1 in AP-42 (11/06), Section 13.2.4.3 and engineering estimates from previous permits. Engineering estimate are based on similar loading factors. Emissions from each piece of

equipment are less than 5 TPY but are subject to a state standard (Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

$$EF = k \times 0.0032 \times \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}}$$

k: particle size multiplier 0.74 PM
0.35 PM_{10}
0.053 $PM_{2.5}$

U: mean wind speed 12.4 mph *[AP-42 (1/95) Table 7.1-9 - OKC]*

Gypsum Handling Emission Factors

Material	Moisture Content, % (M)[1]	Emission Factors (lb/ton)		
		PM	PM_{10}	$PM_{2.5}$
Raw Gypsum	1.65	1.01E-02	4.77E-03	7.23E-04

[1]- moisture content of incoming rock (basis)

Gypsum Handling Emissions

Source	Throughput		PM Emissions		PM_{10} Emissions		$PM_{2.5}$ Emissions	
	Ton/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Truck Unloading	70	613,200	0.71	3.10	0.33	1.46	0.05	0.22
Rock Hopper[1]	70	613,200	0.21	0.93	0.10	0.44	0.02	0.07
Land Plaster Feed Hopper[1]	0.65	5,694	0.01	0.01	0.01	0.01	0.01	0.01
Counterweight Collection Bin	0.001	9.0	0.01	0.01	0.01	0.01	0.01	0.01

[1]- 70% control efficiency for venting inside building. *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*.

Emissions factors for PM, PM_{10}, and $PM_{2.5}$ for the conveyors are based on AP-42 (8/04), Table 11.19.2-2. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

Conveyor Emission Factors

Source	Throughput		Emission Factors (lb/ton)		
	Ton/hr	TPY	PM	PM_{10}	$PM_{2.5}$
Rock Incline Belt	70	613,200	0.003	0.0011	0.000317
Shuttle Belt	70	613,200	0.003	0.0011	0.000317

Conveyor Emissions

Source	PM Emissions		PM_{10} Emissions		$PM_{2.5}$ Emissions	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Rock Incline Belt[1]	0.06	0.28	0.02	0.10	0.01	0.03
Shuttle Belt[1]	0.06	0.28	0.02	0.10	0.01	0.03

[1]- 70% control efficiency for venting inside building. *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*

EUG B CALCINING

The calcine mills are sources of PM, SO_2, VOC, CO, and NOx emissions. The filterable PM emissions for each baghouse are based on a conservative grain loading of 0.01 gr/dscf; PM emissions include those from the rock shaker screen and the rock hammermill. Condensable PM emission factors are based on AP-42 (7/98), Section 1.4 for natural gas combustion. The VOC emissions are based on results of testing conducted on June 16-17, 1998. During the testing, samples were taken under two different operating conditions to determine the effects of adding 5% recycled asphalt board (asphalt makes wallboard water-resistant) and spent oil-dry to the raw gypsum feed. Maximum oil-dry added would be 1,000 pounds per month of which a maximum would be 15% oil by weight or 150 lb/month. The VOC emissions showed an increase when these additional feeds were processed; therefore, the VOC emissions are based on this operating scenario. The emission factors for VOC are based on the highest emission rate observed during the test with an added margin of 100%. The CO, SO_2 and NOx emissions are based on AP-42 (7/98), Section 1.4 emission factors for natural gas combustion.

Calciner Parameters, per Burner (3 burners)		
Burner Rating	25	MMBtu/hr
Flowrate	9,240	scfm
Natural Gas Heating Value	1,020	Btu/scf
Hourly Throughput	23	ton/hr

Calciner Emission Factors

Pollutant	Value	Factors
PM (Condensable)	5.7	lb/MMscf
$PM/PM_{10}/PM_{2.5}$ (Filterable)	0.010	gr/dscf
CO	84	lb/MMscf
VOC	0.015	lb/ton
SO_2	0.6	lb/MMscf
NOx	100	lb/MMscf

Calciner Emissions

Source	PM/PM_{10}/$PM_{2.5}$ (Total)		CO		VOC		SO_2		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
BH-127	0.93	4.08	2.06	9.02	0.35	1.53	0.01	0.06	2.45	10.74
BH-129	0.93	4.08	2.06	9.02	0.35	1.53	0.01	0.06	2.45	10.74
BH-130	0.93	4.08	2.06	9.02	0.35	1.53	0.01	0.06	2.45	10.74

The PM emissions for the calcine pit elevator are based emissions factors from AP-42 (11/06), Section 13.2.4, Equation 1, where moisture content is 0.25%, and the following throughputs. A 99% control efficiency is used for enclosed sources *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)* along with a 70% control efficiency is used for venting inside a building *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO.

Calcine Pit Elevator Emission Factors

Source	Throughput		Enclosure		Emission Factors		
			Source	Building	PM	PM_{10}	$PM_{2.5}$
	TPH	TPY	%	%	lb/ton		
Calcine Pit Elevator	70	613,200	99	70	0.142	0.067	0.0102

Calcine Pit Elevator Emissions

Source	PM		PM_{10}		$PM_{2.5}$	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Calcine Pit Elevator	0.03	0.13	0.01	0.06	<0.01	0.01

EUG C STUCCO COOLING

The PM emissions from the stucco storage bins baghouse are based on the New Source Performance Standards (NSPS) limit of 0.014 gr/dscf for nonmetallic mineral storage bins (Subpart OOO). The stucco storage baghouse controls Stucco Bin #1, Stucco Bin #2, and Stucco Bin #3. The PM emissions from the stucco cooler baghouse are based on engineering estimates for similar control equipment.

Stucco Cooling/Storage Emissions

Source	Grain Loading	Flow	PM/PM_{10}/$PM_{2.5}$ Emissions	
	gr/dscf	Scfm	lb/hr	TPY
Stucco Cooler Baghouse	0.010[1]	52,257	4.48	19.62
Stucco Storage Baghouse	0.014[2]	7,800	0.94	4.10

[1] - Engineering Estimate; [2] - Based on NSPS Subpart OOO Table 2.

The PM emissions for the stucco loading elevator and stucco return elevator are based emissions factors from AP-42 (11/06), Section 13.2.4, Equation 1, where moisture content is 0.25%, and the

following throughputs. A 99% control efficiency is used for enclosed sources *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)* along with a 70% control efficiency is used for venting inside a building *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

Stucco Elevator Emission Factors

Source	Throughput		Enclosure		Emission Factors		
			Source	Building	PM	PM_{10}	$PM_{2.5}$
	TPH	TPY	%	%	lb/ton		
Stucco Loading Elevator	70	613,200	99	70	0.142	0.067	0.0102
Stucco Return Elevator	70	61,320	99	70	0.142	0.067	0.0102

Stucco Elevator Emissions

Source	PM		PM_{10}		$PM_{2.5}$	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Stucco Loading Elevator	0.03	0.13	0.01	0.06	<0.01	0.01
Stucco Return Elevator	0.03	0.01	0.01	0.01	<0.01	<0.01

EUG D BMA SYSTEM

BMA System (LP Hammermill, LP Collection bin, and LP Feeder Bin emissions included) emission factor for LP Baghouse is based on engineering estimates. Engineering estimate are based on similar control devices. Emission factors for the LP Feeder Bin Baghouse are based on NSPS Subpart OOO and flow estimations from the September 2014 permit application. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

BMA System Emissions

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
LP Baghouse[1]	0.010	400	0.01	0.05
LP Feeder Bin Baghouse[1]	0.022	1,000	0.06	0.25

[1]- 70% control efficiency for venting inside building *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*

The PM emissions for the sugar bin vent are based emissions factors from AP-42 (11/06), Section 13.2.4 Equation 1, where moisture content is 4.8%, and the following throughputs. A 99% control efficiency is used for enclosed sources *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)* along with a 70% control efficiency is used for venting inside a building *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*. There are no

emissions from the North and South Ball Mills because they are completely enclosed. Emissions form the BMA day tank are included in the EUG F Area Baghouse.

Sugar Bin Vent Emission Factors

Source	Enclosure		Emission Factors		
	Source	Building	PM	PM_{10}	$PM_{2.5}$
	%	%	lb/ton		
BMA Sugar Bin Vent	99	70	0.00102	0.000481	0.0000729
North Ball Mill/South Ball Mill	Fully enclosed sources with no emissions				
BMA Day Tank	Emissions are included in Area BH				

Sugar Bin Vent Emissions

Source	Throughput		PM		PM_{10}		$PM_{2.5}$	
	TPH	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
BMA Sugar Bin Vent	0.038	306.6	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
North Ball Mill/South Ball Mill	Fully enclosed sources with no emissions							
BMA Day Tank	Emissions are included in Area BH							

EUG E DELIVERY SYSTEMS

Starch Delivery System (Starch Storage Silo, Starch Day Tank, Starch Transfer System and Starch Feeder Hopper) emission factors for Starch Silo Baghouse and Starch Transport System Bin Vent are based on engineering estimates. Engineering estimate are based on similar control devices. Emissions from each piece of equipment are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Starch Delivery System Emissions

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Starch Silo Baghouse	0.010	400	0.03	0.15
Starch Transport System Bin Vent	0.010	199	0.02	0.07

Pre-Gelatinized Starch (PGS) Delivery System (Bulk Bag Unloader, Vacuum Conveyance System) emission factors for PGS Delivery System are based on vendor specifications. Emissions from the PGS Delivery system are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

PGS Delivery System

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
PGS Delivery System Baghouse	0.010	364	0.03	0.14

EUG F DRY ADDITIVES AND WET END

Dry Additives and Mixer (Area Baghouse) (BMA Day Tank, Weigh Bin, Dry Additives Tank Feeders and Pin Mixer) emission factor for Area Baghouse is based on engineering estimates. Engineering estimate are based on similar control devices. Emissions from the Area Baghouse are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Area Baghouse Emissions

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Area Baghouse	0.010	5,400	0.46	2.03

Sugar Bin emission factor for Sugar Bin Vent is based on engineering estimates. Engineering estimate are based on similar control devices. Flow is based on manufacturer's specifications. Emissions from the Sugar Bin Vent are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Sugar Bin Emissions

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Sugar Bin Vent	0.010	450	0.04	0.17

Wet End Dust Collector emission factor and flow rate are based on manufacturer's specifications.

Wet End Forming Line Dust Collector Emissions

Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Wet End Forming Line Dust Collector	0.010	20,000	1.71	7.51

EUG G WALLBOARD DRYER

Emission factors for PM, PM_{10}, $PM_{2.5}$, CO, NO_X, and VOC for the wallboard dryer are based on stack testing conducted on the dryer on September 25, 2019, and March 24, 2020.

PM, PM_{10}, $PM_{2.5}$ emission factors include filterable and condensable portions of PM. Factors were developed based on the maximum of either the highest individual run or the average plus one standard deviation of all runs from the 2019 and 2020 tests for each product type. NO_X was only tested during the 2020 stack testing, so the emission factors developed for NO_X are only based on 2020 test data. Emission factors for CO were developed using the average of the 2019 and 2020 test runs. SO_2 and lead (combustion) emissions are based off AP-42 (7/98), Section 1.4 Table 1.4-1 and 1.4-2, and a dryer heat input rating of 118 MMBtu/hr. Lead (gypsum) emissions are based on maximum values from an analysis of mined gypsum rock plus a safety factor of two standard deviations. PM, PM_{10}, $PM_{2.5}$, VOC, CO, and NOx emissions are based on a maximum hourly wallboard throughput of 87 TPH and an annual wallboard throughput of 615,000 TPY.

Emission Factors for Wallboard Drying

Pollutant	Wallboard	Natural Gas	Raw Gypsum	Emissions	
	lb/ton	lb/MMBtu	ppm	lb/hr	TPY
PM	0.55	---	---	48.24	170.50
PM_{10}	0.32	---	---	27.93	98.73
$PM_{2.5}$	0.22	---	---	18.94	66.93
VOC	0.10	---	---	9.05	31.98
CO	0.55	---	---	47.79	168.90
NO_X	0.17	---	---	14.49	51.21
SO_2	---	5.88×10^{-4}	---	0.07	0.30
Lead (Combustion)	---	4.90×10^{-7}	---	<0.01	<0.01
Lead (Gypsum)	---	---	0.069	<0.01	<0.01
Formaldehyde	0.143	---	---	12.41	43.85
Total GHG	---	116.98	---	13,804	60,460
CO_2e	---	117.10	---	13,818	60,521

EUG H BOARD FINISHING

Dry End Dust Collector emission factor and flow rate are based on manufacturer's specifications. Emissions from the Dry End dust collector are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Dry End Forming Line Dust Collector Emissions

Source	Emission Factor	Flow	$PM/PM_{10}/PM_{2.5}$	
	gr/dscf	scfm	lb/hr	TPY
Dry End Forming Line Dust Collector	0.010	12,000	1.03	4.51

Emissions from the Edge Trim Baghouse and Sleutter Machine dust collector are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Trimming Emissions

Source	Grain Loading[1]	Flow	PM/PM_{10}/$PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Edge Trim Baghouse	0.010	7,000	0.60	2.63
Sleutter Machine Dust Collector	0.010	8,000	0.69	3.00

[1] – Engineering Estimate

Emissions from the End Spray Application are based on an hourly production rate of 75 Msf/hr, and an annual production rate of 555,000 Msf/yr, and a paint application rate of 0.55 lb/Msf. The application rate is based on the maximum paint application rate based on final product specifications plus a 20% safety factor. Emissions from the end spray application are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

End Spray Emissions

Pollutant	Weight Percent	Paint Transfer Efficiency	Emissions	
	%	%	lb/hr	TPY
PM/PM_{10}/$PM_{2.5}$ Emissions	50.81%	95	1.05	4.30
VOC Emissions	0.44%	---	0.18	0.74

EUG I RECLAIM AND RECYCLE

The PM emissions from the reclaim equipment are based on EPA emission factors from AP-42 (1/95), Section 13.2.4 (below). The moisture content in the emissions factor equation is set to the maximum value for which the equation is valid (4.8%). Emissions from the Waste Wallboard pile are less than 5 TPY but are subject to a state standard (Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Emissions from the recycle Bunker Feed and Norba Crusher are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

Reclaim Equipment Emission Factors

Material	Moisture Content (M)[1]	Emission Factors (lb/ton)		
		PM	PM_{10}	$PM_{2.5}$
Recycle Material	4.8	2.26E-03	1.07E-03	1.62E-04

[1] - Moisture content is set to the maximum value for which the above equation is valid. The actual moisture content is 7%.

Reclaim Equipment Emissions

Source	Throughput		PM Emissions		PM_{10} Emissions		$PM_{2.5}$ Emissions	
	TPH	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Waste Wallboard Pile	8	70,080	0.02	0.08	0.01	0.04	0.01	0.01
Recycle Bunker Feed	8	70,080	0.02	0.08	0.01	0.04	0.01	0.01
Norba Crusher	8	70,080	0.02	0.08	0.01	0.04	0.01	0.01

The PM emissions for the recycle hammermill and recycle bucket elevator are based emissions factors from AP-42 (11/06), Section 13.2.4, Equation 1 and the following throughputs. A 99% control efficiency is used for enclosed sources *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)* along with a 70% control efficiency is used for venting inside a building *(Air & Waste Management Association, Air Pollution Engineering Manual, Second Edition, 2000, Chapter 15, Table 4)*. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

Recycle Emission Factors

Source	Throughput		Enclosure		Emission Factors		
			Source	Building	PM	PM_{10}	$PM_{2.5}$
	TPH	TPY	%	%	lb/ton		
Recycle Hammermill	8	70,080	99	70	0.142	0.067	0.0102
Recycle Bucket Elevator	8	70,080	99	70	0.142	0.067	0.0102

Recycle Emissions

Source	PM		PM_{10}		$PM_{2.5}$	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Recycle Hammermill	<0.01	0.01	0.00	0.01	<0.01	<0.01
Recycle Bucket Elevator	<0.01	0.01	0.00	0.01	<0.01	<0.01

EUG J PAINT LINE

Emissions from the paint line board intake and inline saw are based on the following information. Grain loading emissions factors are taken from manufacturer's specifications. Emissions from each piece of equipment are less than 5 TPY but are subject to NSPS Subpart OOO and are therefore not insignificant activities.

Dust Collector Emissions

Source	Grain Loading	Flow	Control Efficiency	$PM/PM_{10}/PM_{2.5}$ Emissions	
	gr/dscf	dscfm	%	lb/hr	TPY
Board Intake Dust Collector	0.01	7,500	70	0.19	0.25
In-Line Saw Dust Collector	0.01	6,500	0	0.56	2.44

Emissions from the paint line ovens are based on natural gas heating value of 1,020 and the following information. Emissions from each piece of equipment are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Paint Line Parameters

Emission Unit	Burner Rating
	MMBTUH
Paint Line Pre-Heater	1.34
Paint Line Oven #1	2.10
Paint Line Oven #2	2.10

Burner Emission Factors

Pollutant	Value	Factors[1]
$PM/PM_{10}/PM_{2.5}$	7.6	lb/MMSCF
CO	84	lb/MMSCF
VOC	5.5	lb/MMSCF
SO_2	0.6	lb/MMSCF
NOx	100	lb/MMSCF

[1] – Emission factors are based on AP-42 (7/98), Tables 1.4-1 and 1.4-2

Paint Line Oven Emissions

Source	$PM/PM_{10}/PM_{2.5}$ (Total)		CO		VOC		SO_2		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
PL-203A	0.01	0.04	0.11	0.48	0.01	0.03	0.01	0.01	0.13	0.58
PL-203B	0.02	0.07	0.17	0.76	0.01	0.05	0.01	0.01	0.21	0.90
PL-203C	0.02	0.07	0.17	0.76	0.01	0.05	0.01	0.01	0.21	0.90

Emissions from the paint line coater are based on an hourly production rate of 42 msf/hr, and an annual production rate of 367,920 msf/yr, and a paint application rate of 60 lb/msf. Paint application rate is based on projected paint usage of a single paint plus a 20% safety factor.

Paint Line Coater Emissions

Pollutant	Weight Percent	Paint Transfer Efficiency	VOC Emissions	
	%	%	lb/hr	TPY
Paint line Coater (FUG1)	0.07%	---	1.76	7.73

Emissions from the ink jet printing and cleaning are based on an hourly production rate of 42 msf/hr, and an annual production rate of 367,920 msf/yr, an ink density of 8.35 lb/gal and an ink application rate of 0.000113 gal/msf, and the following information. Emissions from each piece of

equipment are less than 5 TPY but are subject to a state standard (OAC 252:100, Subchapter 19 and/or Subchapter 25) and are therefore not insignificant activities.

Ink Jet Printing and Cleaning Emissions

Pollutant	Projected Usage		VOC Weight Percentage	VOC Emissions	
	lb/hr	lb/yr	%	lb/hr	TPY
Ink Jet Application VOC Emissions	0.40	346	9.7	0.01	0.02
Ink Jet Cleaner VOC Emissions	0.009	2.53	100	0.01	0.01

EUG K STORAGE TANKS

The facility has several VOC storage tanks as listed below. This includes two aboveground storage tanks, one for unleaded gasoline and one for diesel fuel. Due to limited throughput and relatively small capacity, emissions have been determined to be negligible. Working and breathing emissions from the gasoline and diesel storage tanks are estimated using the DEQ Storage Tank Emissions Calculation Tool, the throughputs listed in the following table, and assuming RVP 10. Emissions from the 125 gallon gasoline storage tank are less than 5 TPY and the tank is not subject to a state or federal standard and is therefore an insignificant activity. Emissions from the tanks are less than 5 TPY, are not subject to a state or federal standard, and are therefore insignificant activities.

Storage Tanks

Tanks Contents	Capacity (gallons)	Vapor Pressure (psia)
Liquid Soap	12,000	0.03
Dispersant	12,050	0.03
Wax Emulsion	12,155	0.43
Wax Emulsion	24,665	0.43
Unleaded Gasoline	125	10.0
Diesel	500	0.01

Storage Tank Emissions

Tank	VOC Emissions
	TPY
Gasoline	0.03
Diesel	0.01

EUG L GENERATOR

The John Deere fire water pump engine is a source of PM, CO, VOC, SO_2 and NOx. Emission factors for PM/PM_{10}/$PM_{2.5}$ (condensable), CO, VOC, and NOx are based on Table 4 of NSPS Subpart IIII. Emission factors for PM/PM_{10}/$PM_{2.5}$ (filterable) are based on AP-42 (10/96), Section 3.4 Table 3.4-2. Emission factors for SO_2 are based on AP-42 (7/00), Section 3.3, Table 3.3-1. Emissions are based on a horsepower rating of 190-hp (142-kW) and 500 hours of operation per year. Emissions from the generator are less than 5 TPY, but the generator is subject to NSPS Subpart IIII and is therefore not an insignificant activity.

Fire Water Pump Engine Emission Factors

Pollutant	Value	Units
$PM/PM_{10}/PM_{2.5}$ (Filterable)	0.20	g/kW-hr
$PM/PM_{10}/PM_{2.5}$ (Condensable)	0.0077	lb/MMBtu
CO	3.50	g/kW-hr
VOC	0.12	g/kW-hr
SO_2	0.00205	lb/hp-hr
NOx	3.88	g/kW-hr

Fire Water Pump Engine Emissions

Source	$PM/PM_{10}/PM_{2.5}$		CO		VOC		SO_2		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Fire Water Pump Engine	0.07	0.02	1.10	0.27	0.04	0.01	0.39	0.10	1.21	0.30

EUG M HAUL ROADS

PM emissions factors for unpaved roads are derived from the AP-42 (11/06), Section 13.2.2. PM emissions factors for paved roads are derived from the AP-42 (01/11), Section 13.2.1. Road emissions are considered fugitive emissions.

Paved Roads

$$EF = (k\ x\ (sL)^{0.91} x\ (W)^{1.02})\ x\ \left(1 - \frac{P}{4N}\right)$$

k: particle size multiplier — 0.011 lb/VMT PM; 0.0022 lb/VMT PM_{10}; 0.00054 lb/VMT $PM_{2.5}$

sL: road surface silt loading — 8.2 g/m^2 *[AP-42 (1/11) Table 13.2.1-3 - Quarry]*

W: mean vehicle weight

P: number of wet days (>0.01in) — 80 days *[AP-42 (1/11) Figure 13.2.1-3 - Quarry]*

N: total number of days — 365 days

Unpaved Roads

$$EF = k\ x\ \left(\frac{s}{12}\right)^{a}\ x\ \left(\frac{W}{3}\right)^{b}\ x\ \left(\frac{365-P}{365}\right)$$

k: particle size multiplier — 4.9 lb/VMT PM; 1.50 lb/VMT PM_{10}; 0.15 lb/VMT $PM_{2.5}$

s: surface material silt loading — 10% *[AP-42 (1/11) Table 13.2.2-1 – Stone Quarry]*

W: mean vehicle weight

a: empirical constant — 0.70 PM

0.90 $PM_{10}/PM_{2.5}$
b: empirical constant 0.45
P: number of wet days (>0.01in) 80 days *[AP-42 (1/11) Figure 13.2.2-1]*

Haul Roads Emission Factors

Source	Paved/ Unpaved	Length (mi)	Fleet Mean Weight (W) (tons)	Emission Factors			VMT
				PM	PM_{10}	$PM_{2.5}$	
				lb/VMT	lb/VMT	lb/VMT	
P1	Paved	0.06	33.0	2.495	0.499	0.122	2,109
P2	Paved	0.12	18.9	1.41	0.282	0.069	2,103
P3	Paved	0.07	16.8	1.255	0.251	0.062	2,902
P4	Paved	0.04	26.6	2.003	0.401	0.098	2,572
P5	Paved	0.06	25.0	1.881	0.376	0.092	3,636
P6	Paved	0.05	25.0	1.881	0.376	0.092	3,142
P7	Paved	0.06	22.5	1.689	0.338	0.083	2,380
P8	Paved	0.03	29.4	2.221	0.444	0.109	690
P9	Paved	0.08	30.0	2.265	0.453	0.111	1,696
P10	Paved	0.01	22.5	1.689	0.338	0.083	10
U1	Unpaved	0.42	15.0	6.948	2.051	0.205	8,529
U2	Unpaved	0.03	30.0	9.491	2.801	0.280	1,324

Haul Road Emissions

Source	Emissions					
	PM		PM_{10}		$PM_{2.5}$	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
P1	0.64	2.63	0.13	0.53	0.03	0.13
P2	0.36	1.48	0.07	0.30	0.02	0.07
P3	0.44	1.82	0.09	0.36	0.02	0.09
P4	0.62	2.58	0.12	0.52	0.03	0.13
P5	0.83	3.42	0.17	0.68	0.04	0.17
P6	0.71	2.96	0.14	0.59	0.04	0.14
P7	0.49	2.01	0.10	0.40	0.02	0.10
P8	0.19	0.80	0.04	0.16	0.01	0.04
P9	0.46	1.92	0.09	0.38	0.02	0.09
P10	0.00	0.01	0.00	0.00	0.00	0.00
U1	7.16	29.63	2.11	8.75	0.21	0.87
U2	1.52	6.28	0.45	1.85	0.04	0.19
TOTALS	**13.00**	**53.83**	**3.39**	**14.02**	**0.48**	**1.97**

Facility-Wide Emissions

EU ID#	Source	NOx	CO	VOC	SO_2	PM_{10}	$PM_{2.5}$
		TPY	TPY	TPY	TPY	TPY	TPY
UNLOAD	Truck Unloading	---	---	---	---	1.46	0.22
HOP1	Rock Hopper	---	---	---	---	0.44	0.07
HOP2	Land Plaster Feed Hopper	---	---	---	---	0.01	0.01
BIN1	Counterweight Collection Bin	---	---	---	---	0.01	0.01
BELT1	Rock Incline Belt	---	---	---	---	0.10	0.03
BELT2	Shuttle Belt	---	---	---	---	0.10	0.03
BH-127	Calcine Mill #1	10.74	9.02	1.53	0.06	4.08	4.08
BH-129	Calcine Mill #2	10.74	9.02	1.53	0.06	4.08	4.08
BH-130	Calcine Mill #3	10.74	9.02	1.53	0.06	4.08	4.08
ELVTR1	Calcine Pit Elevator	---	---	---	---	0.06	0.01
SCREEN1	Rock Shaker Screen[1]	---	---	---	---	---	---
HAMER1	Rock Hammermill[1]	---	---	---	---	---	---
DC-170	Stucco Cooler	---	---	---	---	19.62	19.62
CBE-7907	Stucco Storage Baghouse	---	---	---	---	6.44	6.44
CBE-7907	Stucco Bin #1[2]	---	---	---	---	---	---
CBE-7907	Stucco Bin #2[2]	---	---	---	---	---	---
CBE-7907	Stucco Bin #3[2]	---	---	---	---	---	---
ELVTR2	Stucco Loading Elevator	---	---	---	---	0.06	0.01
ELVTR3	Stucco Return Elevator	---	---	---	---	0.01	0.01
BCA-500	Weigh Bin[3]	---	---	---	---	---	---
BH3	LP Baghouse	---	---	---	---	0.05	0.05
BH3	LP Hammermill[4]	---	---	---	---	---	---
BH3	LP Collection Bin[4]	---	---	---	---	---	---
BH4	LP Feeder Bin Baghouse	---	---	---	---	0.23	0.23
BH3	LP Feeder Bin[5]	---	---	---	---	---	---
VENT1	BMA Sugar Bin Vent	---	---	---	---	0.01	0.01
MILL1	North/South Ball Mill[1]	---	---	---	---	0.00	0.00
DV-007	Starch Silo Baghouse	---	---	---	---	0.15	0.15
DV-007	Starch Storage Silo[6]	---	---	---	---	---	---
VENT2	Starch Day Tank[6]	---	---	---	---	---	---
VENT2	Starch Transport System Bin Vent	---	---	---	---	0.07	0.07
VENT2	Starch Transfer System[7]	---	---	---	---	---	---
VENT2	Starch Feeder Hopper[7]	---	---	---	---	---	---
BH6	PGS Delivery System	---	---	---	---	0.14	0.14
VENT3	Sugar Bin Vent	---	---	---	---	0.17	0.17
BCA-500	Area BH	---	---	---	---	2.03	2.03
TANK1	BMA Day Tank[8]	---	---	---	---	---	---
BCA-500	Dry Additive Tank Feeders[8]	---	---	---	---	---	---
BCA-500	Pin Mixer[8]	---	---	---	---	---	---

EU ID#	Source	NOx	CO	VOC	SO_2	PM_{10}	$PM_{2.5}$
		TPY	TPY	TPY	TPY	TPY	TPY
DRA-204	Wet End Forming Line Dust Collector	---	---	---	---	7.51	7.51
DRYER	Wallboard Dryer	51.21	168.90	31.98	0.30	98.73	66.93
DRA-205	Dry End Forming Line Dust Collector	---	---	---	---	4.51	4.51
DRA-200	Edge Trim Baghouse	---	---	---	---	2.63	2.63
DRA-250	Slueter Machine	---	---	---	---	3.00	3.00
FUG	Waste Wallboard Pile	---	---	---	---	0.04	0.01
RCYL1	Recycle Bunker Feed	---	---	---	---	0.04	0.01
CRUSH1	Norba Crusher	---	---	---	---	0.04	0.01
RCYL2	Recycle Hammermill[1]	---	---	---	---	0.01	0.01
RCYL3	Recycle Bucket Elevator[1]	---	---	---	---	0.01	0.01
FUG	End Spray Application	---	---	0.74	---	4.30	4.30
PL-100	Board Intake Dust Collector	---	---	---	---	0.25	0.25
PL-101	In-Line Saw Dust Collector	---	---	---	---	2.44	2.44
PL-203A	Paint Line Pre-Heater	0.58	0.48	0.03	0.01	0.04	0.04
PL-203B	Paint Line Oven #1	0.90	0.76	0.05	0.01	0.07	0.07
PL-203C	Paint Line Oven #2	0.90	0.76	0.05	0.01	0.07	0.07
FUG	Paint Line Coater	---	---	7.73		---	---
FUG	Ink Jet Ink Application	---	---	0.02		---	---
FUG	Ink Jet Cleaning	---	---	0.01		---	---
TANK2	Gasoline Tank	---	---	0.04		---	---
TANK3	Diesel Tank	---	---	0.01		---	---
ENG1	Emergency Fire Water Pump Engine	0.30	0.27	0.01	0.10	0.02	0.02
FUG	Paved/Unpaved Roads	---	---	---	---	14.02	1.97
TOTALS		**86.11**	**198.23**	**45.26**	**0.61**	**181.13**	**135.34**
PREVIOUS TOTALS [Permit No. 93-065-C (M-17)]		**70.18**	**99.90**	**17.85**	**0.51**	**99.50**	**99.50**
DIFFERENCE		**15.93**	**98.33**	**27.41**	**0.10**	**81.63**	**35.84**

[1] - Emissions included with Calcine Mill Baghouse; [2] - Emissions included with Stucco Storage Baghouse; [3] - Emissions included with BCA-500; [4] - Emissions included with LP Baghouse; [5] - Emissions included with LP Feeder Bin Baghouse; [6] - Emissions included with Starch Silo Baghouse; [7] - Emissions included with Starch Feeder Bin Vent; and [8] - Emissions included with Area BH.

Since emissions of formaldehyde from the Wallboard Dryer are 43.85 TPY, facility-wide single HAP emissions are greater than 10 TPY, total HAP are greater than 25 TPY, and the facility is a major source of HAP.

SECTION V INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Records are available to confirm the insignificance of the activities. Appropriate recordkeeping of activities indicated below with "*" is specified in the Specific Conditions. Any Activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas). The three heaters in EUG J associated with the paint line all have a heat input below 5 MMBTUH.

2. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. All tanks in EUG K, except the gasoline storage tank, have capacities less than 10,000 gallons and store liquids with a vapor pressure below 1.0 psia.

3. Emissions from crude oil and condensate storage tanks with a capacity of less than or equal to 420,000 gallons that store crude oil and condensate prior to custody transfer.

4. Emissions from storage tanks constructed with a capacity less than 39,894 gallons which store VOC with a vapor pressure less than 1.5 psia at maximum storage temperature.

5. Activities having the potential to emit no more than 5 TPY of any criteria pollutant. There are numerous sources that have potential emissions below 5 TPY and are covered further in Section IV and the Specific Conditions.

SECTION VI OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities refer to those individual emission units either listed in Appendix I or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant

- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations for all the sources are taken from the permit application and previous permit.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter From Fuel-burning Equipment) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the engine will be subject to the requirements of this subchapter. Appendix C specifies a PM emission limitation of 0.60 lbs/MMBtu for all equipment at this facility with a heat input rating of 10 MMBtu/hr or less.

Equipment	Maximum Heat Input (MMBTUH)	Appendix C Emission Limit (lbs/MMBTU)	Potential Emission Rate (lbs/MMBTU)
190-Hp John Deere Fire Water	1.40	0.60	0.05
Paint Line Pre-Heater	1.34	0.60	0.01
Paint Line Oven #1	2.10	0.60	0.01
Paint Line Oven #2	2.10	0.60	0.01

Section 19-12 limits the emission of particulate matter from new and existing directly fired fuel-burning units and/or emission points in an industrial process based on the process weight rate, as specified in Appendix G. As shown in the table below, all emission points are in compliance with Subchapter 19.

Source	Process Rate (TPH)	Potential Emission Rate (lbs/hr)	Appendix G Emission Limit (lbs/hr)
Wallboard Dryer	87 TPH	48.24	49.89
Gypsum Handling	70 TPH	1.05	47.8
Calciners	70 TPH	2.80	47.8
LP Baghouse	0.65 TPH	0.05	3.07
LP Feeder Baghouse	0.65 TPH	0.23	3.07
Starch Baghouse	0.63 TPH	0.15	3.01
Starch Transport System Bin Vent	0.63 TPH	0.07	3.01
PGS Delivery System	0.40 TPH	0.14	2.22
Sugar Bin Vent	0.14 TPH	0.17	1.10
Stucco Storage Baghouse	70 TPH	6.44	47.8
Stucco Cooler Baghouse	70 TPH	19.62	47.8
Edge Trim Baghouse	87 TPH	0.60	49.89
Sleutter Machine Baghouse	4 TPH	0.69	10.38
Area Cleanup Baghouse	0.23 TPH	2.03	1.53
Reclaim Equipment	16 TPH	0.054	26.3
Wet End Dust Collector	7.91 TPH	1.71	16.4
Dry End Dust Collector	87 TPH	1.03	49.89
Board Intake Baghouse	57 TPH	0.19	45.75
In-line Saw Baghouse	57 TPH	0.56	45.75

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. The sources identified in the "Testing" section of this memo are subject to NSPS Subpart OOO. Thus, per OAC 252:100-25-3 (a), they are exempt from this subchapter. When burning natural gas in any of the combustion devices at the facility, there is very little possibility of exceeding these standards. The wallboard dryer, starch storage baghouse, edge trim baghouse, reclaim bunker and feed and discharge screws are subject to this subpart. The permit will require monitoring of the baghouse pressure differentials to ensure proper operation. If readings are outside the range or if any visible emissions are observed, then opacity readings shall be performed to ensure compliance. In addition, in the event of any malfunctioning system, records of work orders shall be maintained.

OAC 252:100-29 (Fugitive Dust) [Applicable]

No person shall cause or permit the discharge of visible fugitive dust beyond the property line on which the emissions originated in such a manner as to damage or interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or to interfere with the maintenance of air quality standards. The facility must take reasonable precautions to minimize or prevent pollution. The facility took significant steps during the original design and construction of the processes to contain potential sources of fugitive dust; the unloading, transfer, and storage of gypsum. All of the raw gypsum rock is delivered into a two-sided enclosed shed, transferred via an enclosed conveyor

and then stored under cover prior to it being transferred into the process under cover. The gypsum processes are controlled via baghouses that are maintained on a regular basis. The permit establishes the specific requirements under OAC 252:100-29-3(1) through (6) the facility must comply with.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2 limits the ambient air impact of hydrogen sulfide (H_2S) emissions from any new or existing source to 0.2 ppmv (24-hour average) which is equivalent to 283 $\mu g/m^3$. Fuel-burning equipment fired with pipeline natural gas will not have the potential to exceed the H_2S ambient air concentration limit.
Part 5 limits sulfur dioxide emissions from new petroleum or natural gas process equipment (constructed after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours. For fuel gas having a gross calorific value of 1,020 Btu/scf, this limit corresponds to fuel sulfur content of 1,227 ppmv. The permit requires the use of pipeline natural gas for all natural gas-fired equipment to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides) [Applicable]
This subchapter limits new gas-burning equipment with rated heat input greater than or equal to 50 MMBtu/hr to emissions of 0.2 lb of NOx per MMBtu. The dryer has a rated heat input of 118 MMbtu/hr and is subject to this subpart. Recent testing shows the dryer is in compliance with this subpart. The permit incorporates the applicable emission limit.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
This facility has none of the affected sources: foundry cupola, blast furnace, basic oxygen furnace, catalytic cracking unit, or other petroleum or natural gas process. There are no affected sources.
OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3 affects volatile organic compound (VOC) storage tanks with a capacity between 400 and 40,000 gallons storing a liquid with a vapor pressure of 1.5 psia or more. They must be operated with a permanent submerged fill pipe or equally effective means of organic vapor loss control. The gasoline storage tank has a capacity below 400 gallons and is not required to be equipped with a submerged fill pipe.
Part 3 affects loading facilities with throughput greater than 40,000 gallons/day. Each VOC loading facility with a throughput greater than 40,000 gal/d (151,416 l/d) from its aggregate loading pipes shall be equipped with a vapor-collection and disposal system unless all tank trucks or trailers are bottom loaded with hatches closed. The facility throughput is below 40,000 gallons/day.
Part 5 limits the VOC content of coatings used in coating lines and operations. The limits are given in the following table.

Coating Type	**Limit [1] (lb VOC/gal. coating)**
Alkyd primer	4.8
Vinyls	6.0
NC lacquers	6.4
Acrylics	6.0
Epoxies	4.8
Maintenance finishes	4.8

Coating Type	Limit [1] (lb VOC/gal. coating)
Custom products finish	6.5

[1] These limits apply to the coatings as applied. The limits are expressed in pounds of VOC per gallon of coating, excluding the volume of any water and exempt organic compounds.

As an alternative to these VOC content limits for coatings used at the facility, the owner or operator may elect to develop a plant-wide emission plan in accordance with OAC 252:100-37-25(b) or the facility may reduce emissions of VOCs from coatings with higher VOC concentrations to the levels indicated by incineration, absorption/adsorption, or any other process of equivalent reliability and protectiveness provided that no air pollution, as defined by the Clean Air Act, results.

Part 5 requires all emissions of VOC from the cleanup of any article, machine, or equipment used in applying coatings to be included when determining compliance with the above stated solvent limitations and emission limits. All solvent usage not incorporated into the coatings as they are applied has been averaged over coating usage and all coatings still comply with the VOC limitations.

Part 7 requires fuel-burning and refuse-burning equipment to be cleaned, operated, and maintained to minimize emissions of VOC. Based on manufacturer's data and good engineering practice, the equipment must not overloaded and temperature and available air must be sufficient to provide essentially complete combustion. The equipment at this location is subject to this requirement.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice of intent-to-test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

Each emissions unit must be evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant by pollutant basis. The frequency of the periodic testing requirement is based on the quantity of emissions an emission unit is permitted to emit. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEMS), or predictive emission monitoring (PEMS). The wallboard dryer has CO emissions greater than 100 TPY.

Periodic Testing Review

EUG/EU	Pollutant	TPY	Current Monitoring	Periodic Testing
DRYER	CO	168.9	**NO**	**EVERY 5 YEARS**

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-11	Alternative Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Feed & Grain Facility	not in source category
OAC 252:100-39	Nonattainment Areas	not in a subject area
OAC 252:100-47	Landfills	not type of source category

SECTION VII FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Not Applicable]

Total emissions are less than the major source threshold of 250 TPY of any single regulated pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60 [Subparts OOO and IIII Applicable]

Subpart OOO (Non-Metallic Minerals Processing Plants). The following facilities at a non-metallic minerals processing plant that commenced construction, reconstruction, or modification after August 31, 1983, are affected by Subpart OOO: each crusher, grinding mill, bucket elevator, screening operation, belt conveyor, bagging operation, storage bin, and enclosed truck or railcar loading station. Excluded from the list of affected facilities are truck dumping and transfer points from belt conveyors to stockpiles. For affected facilities (as defined in §§60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008, Subpart OOO specifies the following standards for fugitive emissions of particulate matter: no fugitive emissions discharge from any crusher greater than 15% opacity nor any discharge from any other affected facility greater than 10% and also limits stack emissions to 0.05 g/dscm and 7% opacity unless the stack emissions are discharged from an affected facility using a wet scrubber. For Affected facilities (as defined in §§60.670 and 60.671) that commence construction, modification, or reconstruction on or after April 22, 2008, Subpart OOO specifies the following standards for fugitive emissions of particulate matter: no fugitive emissions discharge from any crusher greater than 12% opacity nor any discharge from any other affected facility greater than 7% and also limits stack

emissions to 0.032 g/dscm and 7% opacity unless the stack emissions are discharged from an affected facility using a wet scrubber.

For affected facilities for which construction, modification, or reconstruction commenced on or after April 22, 2008, this subpart requires monitoring of baghouses according to §60.674(c), (d), or (e) and §60.676(b) and repeat performance test according to §60.11 and §60.675 within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays.

In September 1988, EPA Region VI determined stucco was a qualifying mineral subject to this subpart. ODEQ then defined the affected sources and required Subpart OOO testing. Based on that previous determination, the calciners/impact mills were not and are not included as affected facilities. All emissions stacks on affected facilities at this plant are controlled by baghouses. The company conducted performance testing on affected equipment installed in the original permit on March 28 and 29, 1989. The added equipment in the 1993 construction permit had performance testing conducted in July, August, and October 1995 prior to issuance of that operating permit. The facility demonstrated compliance with the requirements of this subpart. Details on the tested equipment are included in the testing section. The Rock Incline Belt Conveyor, Shuttle Belt, Rock Shaker Screen, Rock Hammermill, Stucco Equipment in EUG C, LP Baghouse, LP Hammermill, LP Feeder Bin, North Ball Mill\South Ball Mill, Recycle Bunker Feed, Recycle Hammermill and Recycle Bucket Elevator are subject to this subpart.

If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in §60.672(a) and (b), or the building enclosing the affected facility or facilities must comply with the following emission limits:
(1) Fugitive emissions from the building openings (except for vents as defined in §60.671) must not exceed 7 percent opacity; and
(2) Vents (as defined in §60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of this subpart.

All applicable requirements have been incorporated into the permit.

Subpart UUU (Calciners and Dryers in Mineral Industries). This subpart applies to each calciner and dryer at mineral processing plants for which construction, modification, or reconstruction commenced after April 23, 1986. This facility applied for a construction permit in 1984. Construction of the calciners and dryer began prior to April 1986. Because construction began before April 1986, the calciners at this facility are not subject to this subpart. The stucco cooler installed in 1999 is not subject to this subpart. Although the cooler may remove some residual moisture, it does not meet the definition of a dryer since there is no direct or indirect heating associated with the cooler. In addition, although the calciners and cooler are in fact in series, the exhaust gases from the one do not flow through the other and therefore are not discharged as a combined stream. Each calciner and the cooler have separate exhaust stacks. Since the wallboard dryer is designated as a "tunnel dryer" it is not subject to this subpart as defined in §60.732(b). Several new paint line ovens were constructed at the facility (PL-203A, PL-203B, and PL-203C) in 2020. These ovens are used to dry paint on finished wallboard and not to remove uncombined water from mineral material. Therefore, the paint line ovens do not meet the definition of dryer under this subpart. The facility is therefore not subject to this subpart.

Subpart IIII, (Stationary Compression Ignition Internal Combustion Engines). This subpart affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The new 190-Hp John Deere Fire Water Pump is an "EPA Certified" engine that was manufactured in December 2017 and is therefore subject to this subpart.

All applicable requirements have been incorporated into the permit.

Subpart JJJJ, (Stationary Spark Ignition Internal Combustion Engines (SI-ICE)). There are no spark ignition engines at this facility.

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only applies to process streams which contain more than 10% benzene by weight. Analysis of Oklahoma natural gas indicates a maximum benzene content of less than 1%.

NESHAP, 40 CFR Part 63 [Subpart ZZZZApplicable]
Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. This subpart affects miscellaneous metal parts and products surface coating facilities. An affected facility is one that uses at least 250 gallons per year of coatings that contain HAP, and is either major or located at a source that is major, as defined in 40 CFR §63.2. This facility does not paint any metal parts or products and is therefore not subject to this subpart.
Subpart JJJJ, Paper and Other Web Coating. This subpart describes the actions that must be taken to reduce emissions HAP from paper and other web coating operations and establishes emission standards for web coating lines. Web coating line means any number of work stations, of which one or more applies a continuous layer of liquid or semi-liquid coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station. Web means a continuous substrate (e.g., paper, film, foil) which is flexible enough to be wound or unwound as rolls. The coating line applies coating to the wallboard which is not considered a web. Therefore, facility does not involve paper or other web coatings.
Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE at major and area sources of HAP emissions. Owners and operators of new engines and reconstructed engines at area sources and of new or reconstructed engines with a site rating equal to or less than 500 HP located at a major source (except new or reconstructed 4-stroke lean-burn engines with a site rating greater than or equal to 250 HP and less than or equal to 500 HP located at a major source) meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines). This facility is a major source of HAP. The fire water pump was constructed after June 12, 2006, and is considered a new affected source and must meet the requirements of NSPS Subpart IIII. The facility complies with Subpart ZZZZ by meeting the requirements of 40 CFR Part 60 Subpart IIII.

Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters. This subpart establishes emission standards for the control of HAP from industrial, commercial, and institutional boilers and process heaters at major sources of HAP. The compliance dates for the rule are January 31, 2016, for existing sources and, January 31, 2013, or upon startup, whichever is later, for new sources. A boiler or process heater is new or reconstructed if construction or reconstruction of the boiler or process heater commenced on or after June 4, 2010.
Most of the potentially affected sources at the facility are considered units designed to burn gas 1 fuels. *Unit(s) designed to burn gas 1 subcategory* includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory must conduct tune-ups as a work practice for all regulated emissions under Subpart DDDDD as indicated:

Heat Input Capacity	**Tune-up**
≤ 5 MMBTUH	Every 5 years
> 5 MMBTUH < 10 MMBTUH	Every 2 years
> 10 MMBTUH Without O_2 Trim System	Annually
> 10 MMBTUH With O_2 Trim System	Every 5 years
Limited Use	Every 5 years

Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of Subpart DDDDD, or the operating limits in Table 4 of Subpart DDDDD. The Wallboard Dryer and Paint Line Ovens do not meet the definition of a boiler or process heater and are not subject to this subpart.
Subpart CCCCCC, Gasoline Dispensing Facilities. This subpart establishes emission limitations and management practices for HAP emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source. This facility is a major source of HAP; therefore, the 125-gallon gasoline storage tank is not subject to this subpart.

SECTION VIII COMPLIANCE

Testing

On March 28 and 29, 1989, performance testing was conducted on NSPS Subpart OOO affected sources with the following results. Method 22 testing showed no visible fugitive emissions from the building. The stack test conducted on the edge trim baghouse stack resulted in average grain loading of 0.0081 g/dscm with an opacity of 0% versus the standard of 0.05 g/dscm and 7% opacity. Likewise, testing on the stucco transfer bin baghouse showed an average grain loading of 0.0018 g/dscm and an opacity of 0% versus the standard. The facility demonstrated compliance with the NSPS standard.

Method 9 testing was conducted over a period of approximately two weeks from July 4 through 20 in 1995. The recorded opacity for each source met the allowable opacity. The particulate matter testing was conducted on August 8-9, 1995, in accordance with Method 5. The silo area clean-up baghouse had emissions of 0.02 lb/hr and 0.0011 g/dscm compared with the limitation of 0.20 lb/hr and 0.05 g/dscm. The reclaim baghouse was tested on October 3, 1995, and had emissions of 0.063 lb/hr and 0.0027 g/dscm which is in compliance with the limitation of 0.10 lb/hr and 0.05 g/dscm.

Source	Avg. Recorded Opacity (%)	Avg. Allowable Opacity (%)	Avg. Recorded g/dscm	Avg. Allowable g/dscm
Norba Crusher	0	15	---	---
Reclaim Bunker	0	10	---	---
Crusher Discharge	0	20	---	---
Bucket Elevator Feed	0	20	---	---
Bucket Elevator	0	10	---	---
Bucket Elevator Discharge	0	20	---	---
Reclaim Baghouse	0	7	0.0027	0.05
Silo Area Cleanup	0	7	0.0011	0.05

On June 16-17, 1998, GP performed stack tests to verify the PM emission factor for the reclaim/edge trim baghouse and the VOC and CO emission factors for the calciners. The calciner VOC emission factor was based on worst-case, i.e., 5% asphalt and 30 pounds of oil-dry. Calciner emission factors were then increased 100% above the worst-case numbers to calculate permitted levels.

On November 10, 1999, Southwest Laboratories conducted performance testing on Stucco Cooler Baghouse No. 2 (DC-170) and Calciner Mill No. 3 (BH-130) at the plant. The following is a summary of the results of the test program:

- The average PM emission rate of the Stucco Cooler Baghouse No. 2 stack (DC-170) was 0.16 lb/hr which is less than the limit of 0.19 lb/hr. In addition, on December 22, 1999, plant personnel performed additional Method 9 testing and submitted reports of 0% opacity demonstrating compliance.
- The average PM emission rate of the Calciner Mill No. 3 stack (BH-130) was 0.05 lb/hr which is 1.6% of the permit limit of 3.5 lb/hr.
- Unit operating rates were recorded by Temple-Inland personnel as 22.3 tons/hr per calciner while producing 5/8" by 4 x 8' wallboard at a line speed of 220 ft/min for a throughput of 52.8 MSF per hour. The stucco cooler test was run while processing 44.62 tons of stucco per calciner on a two-hour test.

The facility conducted stack testing on the wallboard dryer for several pollutants in September 2019 and March 2020. The emission factors incorporate the stack test results for PM, PM_{10}, $PM_{2.5}$, CO, NOx, and VOC. The factors were developed based on the maximum of either the highest individual run or the average plus one standard deviation of all runs from the 2019 and 2020 tests for each product type.

Pollutants	Wallboard lb/ton
PM	0.55
PM_{10}	0.32
$PM_{2.5}$	0.22
VOC	0.10
CO	0.55
NO_X	0.17
Formaldehyde	0.143

These results are being relied on for compliance with the specific conditions.

All baghouses operate with differential pressure ranges as shown in the table below.

Baghouse Parameters

EU ID	Description	Pressure Range (Inches of Water)
BH-127	#1 Calciner (Imp Mill)	0.2 - 5.0
BH-129	#2 Calciner (Imp Mill)	0.2 - 5.0
BH-130	#3 Calciner (Imp Mill)	0.2 - 5.0
CBE-7907	Stucco Storage	0.2 - 8.0
BH3	LP Baghouse[1]	0.2 - 8.0
BH4	LP Feeder Baghouse[1]	0.2 - 8.0
DV-007	Starch Storage	0.2 - 3.0
DRA-200	Edge Trim	0.2 - 8.0
DRA-250	Sleutter Machine	0.2 - 8.0
DRA-204	Wet End Dust Collector	0.2 – 8.0
DRA-205	Dry End Dust Collector	0.2 – 8.0
DC-170	Stucco Cooler	0.2 - 5.0
BCA-500	Area Cleanup	0.2 - 8.0
PL-100	Board Intake[1]	0.2 - 8.0
PL-101	In-Line Saw	0.2 - 8.0

[1] – Vents inside building.

Although the steady state operational ranges are substantial, the plant has developed procedures for monitoring performance. Plant personnel record readings daily. If readings are outside the range or if any visible emissions are observed, then opacity readings are performed to ensure compliance. In addition, in the event of any malfunctioning system, records of work orders are maintained.

The one (1) 190-hp John Deere diesel-fired water pump engine was manufactured and constructed in 2017. Therefore, the facility is subject to NSPS Subpart IIII and NESHAP Subpart ZZZZ. The on-site NSPS Subpart IIII emergency fire water pump engine is certified by the EPA under certification number FLDXL06.8120-004. No testing is required since the engine is operated as certified.

Inspection

A full compliance evaluation was conducted on September 10, 2020. The inspection was conducted by Rodney Pesch of Air Quality who was accompanied by Ms. Nyna Saenz, Environmental Manager (in person) during the FCE. The facility was physically as described in the permit application and no violations were observed.

Tier Classification and Public Review

This application has been determined to be a **Tier II** based on a request for a major source construction permit to change the facility classification from a synthetic-minor source to a major source of emissions. The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land. Information on all permit actions is available for review by the public on the Air Quality section of the DEQ web page at: *https://www.deq.ok.gov*.

The applicant will publish the "Notice of Filing a Tier II Application" and the "Notice of Tier II Draft Permit" in a local newspaper in the Comanche County, Oklahoma. The notices will state that the draft permit will be available for a 30-day public review at the facility or the DEQ office in Oklahoma City. The notices will also state that the draft permit will be available for public review in Comanche County, Oklahoma. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: *https://www.deq.ok.gov*.

The applicant requested and was granted concurrent public and EPA review periods. The draft permit will be available for public review on the Air Quality section of the DEQ web page at *https://www.deq.ok.gov*. The proposed permit will be sent to EPA for a 45-day review period.

This facility is located within 50 miles of the border of Oklahoma and Texas. The State of Texas will be notified of the draft permit.

Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: *https://www.deq.ok.gov/*.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that

satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

Fee paid
Major source construction fee of $7,500 is owed. $2,000 was paid on August 26, 2020, and $5,500 was paid on October 1, 2020.

SECTION IX SUMMARY

The applicant has demonstrated the ability to comply with the requirements of the applicable air quality control rules and regulations. There are no active Compliance or Enforcement issues which would prevent issuance of the permit. Issuance of the construction permit is recommended, contingent on public and EPA review.

DRAFT/PROPOSED

PERMIT TO CONSTRUCT
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS

Georgia-Pacific Gypsum LLC **Permit No. 93-065-C (M-16)**
Fletcher Gypsum Wallboard Plant

The permittee is authorized to construct in conformity with the specifications submitted to Air Quality on July 29, 2020. The Evaluation Memorandum dated March 9, 2021, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Commencing construction and operating under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emissions limitations for each point: [OAC 252:100-8-6(a)]

EUG A GYPSUM HANDLING

Emissions from UNLOAD, HOP1, and HOP2 are based on throughput, are fugitive in nature, and do not have a specific emission limitation.

EU ID	Source
UNLOAD	Truck Unloading
HOP1	Rock Hopper
HOP2	Land Plaster Feed Hopper
BIN1	Counterweight Collection Bin
BELT1	Rock Incline Belt
BELT2	Shuttle Belt

A. BELT1 and BELT2 in this EUG are subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4. [40 CFR Part §§ 60.670-60.676]

EUG B CALCINING

EU ID	Source
BH-127	#1 Calciner
BH-129	#2 Calciner
BH-130	#3 Calciner
ELVTR1	Calcine Pit Elevator
SCREEN1	Rock Shaker Screen
HAMER1	Rock Hammermill

Source	$PM/PM_{10}/PM_{2.5}$ (Total)		CO		NOx	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
BH-127	0.93	4.08	2.06	9.02	2.45	10.74
BH-129	0.93	4.08	2.06	9.02	2.45	10.74
BH-130	0.93	4.08	2.06	9.02	2.45	10.74

B. ELVTR1, SCREEN1, and HAMER1 in this EUG are subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4.
[40 CFR Part §§ 60.670-60.676]

C. Each calciner (BH-127, BH-129, and BH-130) shall have emissions routed to a baghouse.
[OAC 252:100-19 & 100-25]

EUG C STUCCO COOLING

EU ID	Source
DC-170	Stucco Cooler Baghouse
CBE-7907	Stucco Storage Baghouse
CBE-7907	Stucco Bin #1
CBE-7907	Stucco Bin #2
CBE-7907	Stucco Bin #3
ELVTR2	Stucco Loading Elevator
ELVTR3	Stucco Return Elevator

D. The equipment in this EUG is subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4. [40 CFR Part §§ 60.670-60.676]

EUG D BMA SYSTEM

EU ID	Source
BH3	LP Baghouse
BH3	LP Hammermill
BH3	LP Collection Bin
BH4	LP Feeder Bin Baghouse
BH3	LP Feeder Bin
VENT1	BMA Sugar Bin Vent
MILL1	North Ball Mill/South Ball Mill
TANK1	BMA Day Tank

E. BH3, BH4, and MILL1 in this EUG are subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4. [40 CFR Part §§ 60.670-60.676]

F. Emissions from TANK1 shall be routed to the Area Baghouse (BCA-500).
[OAC 252:100-19 & 100-25]

EUG E DELIVERY SYSTEMS

EU ID	Source
DV-007	Starch Silo Baghouse
VENT2	Starch Transport System Bin Vent
BH6	PGS Delivery System Baghouse
DV-007	Starch Storage Silo
VENT2	Starch Day Tank
VENT2	Starch Feed Hopper

EU ID	Source	Grain Loading	Flow	$PM/PM_{10}/PM_{2.5}$ Emissions	
		gr/dscf	scfm	lb/hr	TPY
DV-007	Starch Silo Baghouse	0.010	400	0.03	0.15
VENT2	Starch Transport System Bin Vent	0.010	199	0.02	0.07
BH6	PGS Delivery System Baghouse	0.010	364	0.03	0.14

G. Emissions from the Starch Storage Silo, Starch Day Tank, and Starch Feed Hopper shall be routed to a baghouse. [OAC 252:100-19 & 100-25]

EUG F DRY ADDITIVES AND WET END

EU ID	Source
BCA-500	Area Baghouse
BCA-500	Weigh Bin
BCA-500	Dry Additives Tank Feeder
BCA-500	Pin Mixer
VENT3	Sugar Bin Vent
DRA-204	Wet End Forming Line Dust Collector

Source	Grain Loading	Flow	PM/PM_{10}/$PM_{2.5}$ Emissions	
	gr/dscf	scfm	lb/hr	TPY
Area Baghouse	0.010	5,400	0.46	2.03
Sugar Bin Vent	0.010	450	0.04	0.17
Wet End Forming Line Dust Collector	0.010	20,000	1.71	7.51

H. Emissions from the Weigh Bin, Dry Additives Tank Feeder, and Pin Mixer shall be routed to the Area Baghouse (BCA-500). [OAC 252:100-19 & 100-25]

I. Emissions from the Wet End Forming Line shall be routed to the dust collector (DRA-204) or equivalent control device. [OAC 252:100-19 & 100-25]

EUG G WALLBOARD DRYER

Pollutant	Wallboard	Emissions	
	lb/ton	lb/hr	TPY
PM	0.55	48.24	170.50
PM_{10}	0.32	27.93	98.73
$PM_{2.5}$	0.22	18.94	66.93
VOC	0.10	9.05	31.98
CO	0.55	47.79	168.90
NO_X	0.17	14.49	51.21
Formaldehyde	0.143	12.41	43.85

J. Annual emissions from the wallboard dryer, DRYER, shall be determined monthly, with compliance based on a 12-month rolling total. Emissions shall be determined based on the emission factors above or product-specific stack test data. Records of wallboard type and quantity produced shall be kept.

EUG H BOARD FINISHING

Emissions from this EUG do not have a specific emission limitation. Emissions from End Spray Application are based on throughput, are fugitive in nature, and do not have a specific emission limitation.

EU ID	Source
DRA-200	Edge Trim Baghouse
DRA-250	Sleutter Machine Dust Collector
FUG	End Spray Application
DRA-205	Dry End Forming Line Dust Collector

K. Emissions from Board Finishing Operations shall be routed to a baghouse.
[OAC 252:100-19 & 100-25]

L. The VOC content of coatings used in a coating line or operation that was constructed after December 28, 1974, or an existing coating line or operation that was modified, replaced, or reconstructed after December 28, 1974, such that the amount of emissions is increased, as applied shall not exceed the following limits, excluding the volume of any water and exempt organic compounds: [OAC 252:100-37]

Coating	lb VOC/gallon Coating
Alkyd Primers	4.8
Epoxies	4.8
Maintenance Finishes	4.8
Vinyls	6.0
Acrylics	6.0
NC lacquers	6.4
Custom Product Finishes	6.5

1. VOC contained in any solvents, cleanup materials, degreasers, or similar materials, shall be considered as 100% emissions, based on MSDS analysis and quantities of each used.

EUG I RECLAIM AND RECYCLE

Emissions from this EUG do not have a specific emission limitation. Emissions from the Waste Wallboard Pile are based on throughput, are fugitive in nature, and do not have a specific emission limitation.

EU ID	Source
FUG	Waste Wallboard Pile
RCYL1	Recycle Bunker Feed
CRUSH1	Norba Crusher
RCYL2	Recycle Hammermill
RCYL3	Recycle Bucket Elevator

M. RCYL1, CRUSH1, RCYL2, and RCYL3 in this EUG are subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4.
[40 CFR Part §§ 60.670-60.676]

EUG J PAINT LINE

Emissions from the Paint Line Coater, Ink Jet Application, and Ink Jet Cleaner are based on throughput, are fugitive in nature, and do not have a specific emission limitations.

EU ID	Source	Capacity
PL-100	Board Intake Dust Collector	N/A
PL-101	In-Line Saw Dust Collector	N/A
PL-203A	Paint Line Pre-Heater	1.34-MMBTUH
PL-203B	Paint Line Oven #1	2.10-MMBTUH
PL-203C	Paint Line Oven #2	2.10-MMBTUH
FUG1	Paint Line Coater	42-msf/hr
FUG	Ink Jet Application VOC Emissions	42-msf/hr
FUG	Ink Jet Cleaner VOC Emissions	42-msf/hr

N. PL-100 and PL-101 in this EUG are subject to NSPS Subpart OOO and shall comply with all applicable requirements in Specific Condition 4. [40 CFR Part §§ 60.670-60.676]

O. PL-203A, PL-203B, and PL-203C are insignificant activities and shall comply with all applicable requirements in Specific Condition 12. [OAC 252:100-8-2]

P. The VOC content of coatings used in a coating line or operation that was constructed after December 28, 1974, or an existing coating line or operation that was modified, replaced, or reconstructed after December 28, 1974, such that the amount of emissions is increased, as applied shall not exceed the following limits, excluding the volume of any water and exempt organic compounds: [OAC 252:100-37]

Coating	lb VOC/gallon Coating
Alkyd Primers	4.8
Epoxies	4.8
Maintenance Finishes	4.8
Vinyls	6.0
Acrylics	6.0
NC lacquers	6.4
Custom Product Finishes	6.5

1. VOC contained in any solvents, cleanup materials, degreasers, or similar materials, shall be considered as 100% emissions, based on MSDS analysis and quantities of each used.

EUG K STORAGE TANKS

Tanks Contents	Capacity (gallons)
Liquid Soap	12,000
Dispersant	12,050
Wax Emulsion	12,155
Wax Emulsion	24,665
Unleaded Gasoline	125
Diesel	500

Q. Emissions from the storage tanks are insignificant and do not have a specific limitations. The tanks shall comply with all applicable requirements in Specific Condition 12.

[OAC 252:100-8-2]

EUG L GENERATOR

EU ID	Source	Capacity
ENG1	Fire Water Pump Engine	190-hp

R. The permittee shall comply with all applicable requirements of 40 CFR Part 60, NSPS for Stationary Compression Ignition Internal Combustion Engines, Subpart IIII, for each affected engine including but not limited to the following: [40 CFR Part 60, Subpart IIII]

i. §60.4200: Am I subject to this subpart?
ii. §60.4202: What emissions standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacture?
iii. §60.4204: What emissions standards must I meet for non-emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
iv. §60.4205: What emissions standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?
v. §60.4206: How long must my engines meet the emissions standards if I am a owner or operator of a stationary CI internal combustion engine?
vi. §60.4207: What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?
vii. §60.4208: What is the deadline for importing or installing stationary CI ICE produced in the previous model year?
viii. §60.4209: What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?
ix. §60.4211: What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?
x. §60.4212: What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?
xi. §60.4213: What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of greater than or equal to 30 liters per cylinder?
xii. §60.4214: What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary CI internal combustion engine?
xiii. §60.4217: What emission standards must I meet if I am an owner or operator of a stationary internal combustion engine using special fuels?
xiv. §60.4218: What parts of the General Provisions apply to me?
xv. §60.4219: What definitions apply to this subpart?

S. The owner/operator shall comply with all applicable requirements of the NESHAP: Reciprocating Internal Combustion Engines, Subpart ZZZZ, for each affected facility including but not limited to: [40 CFR §§63.6580 through 63.6675]

What This Subpart Covers

i. § 63.6580 What is the purpose of subpart ZZZZ?
ii. § 63.6585 Am I subject to this subpart?
iii. § 63.6590 What parts of my plant does this subpart cover?
iv. § 63.6595 When do I have to comply with this subpart?

Emission and Operating Limitations

v. § 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

General Compliance Requirements

vi. § 63.6605 What are my general requirements for complying with this subpart?

Testing and Initial Compliance Requirements

vii. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
viii. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

Continuous Compliance Requirements

ix. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

Notifications, Reports, and Records

x. § 63.6650 What reports must I submit and when?
xi. § 63.6655 What records must I keep?
xii. § 63.6660 In what form and how long must I keep my records?

Other Requirements and Information

xiii. § 63.6665 What parts of the General Provisions apply to me?
xiv. § 63.6670 Who implements and enforces this subpart?
xv. § 63.6675 What definitions apply to this subpart?

EUG M HAUL ROADS

Fugitive emissions from the haul roads do not have a specific limitation.

EU ID	Source
FUG	Haul Roads

T. The facility shall comply with all applicable requirements in Specific Condition 11 and use reasonable precautions to minimize fugitive dust.

2. The permittee shall be authorized to operate this facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)]

3. Production shall not exceed the limits below: [40 CFR § 60.8(c)]
   A. TPH limits shall be based on daily averages.
   B. TPY limits shall be based on monthly and 12-month rolling totals.

Emission Unit	Description	Process Limitation
EUG A	Gypsum Handling	70 TPH
EUG G (DRYER)	Wallboard Dryer	87 TPH / 615,000 TPY
EUG H (FUG)	End Spray Application	75 Msf/hr / 555,000 Msf/yr
EUG I	Reclaim and Recycle	8 TPH / 70,080 TPY
EUG J (FUG)	Paint line Coater	42 Msf/hr / 367,920 Msf/yr

4. Each baghouse shall be operated as required following:

EU ID	Description	Pressure Range (Inches of Water)
BH-127	#1 Calciner (Imp Mill)	0.2 - 5.0
BH-129	#2 Calciner (Imp Mill)	0.2 - 5.0
BH-130	#3 Calciner (Imp Mill)	0.2 - 5.0
CBE-7907	Stucco Storage	0.2 - 8.0
BH3	LP Baghouse[1]	0.2 - 8.0
BH4	LP Feeder Baghouse[1]	0.2 - 8.0
DV-007	Starch Storage	0.2 - 3.0
DRA-200	Edge Trim	0.2 - 8.0
DRA-250	Sleutter Machine	0.2 - 8.0
DRA-204	Wet End Dust Collector	0.2 – 8.0
DRA-205	Dry End Dust Collector	0.2 – 8.0
DC-170	Stucco Cooler	0.2 - 5.0
BCA-500	Area Cleanup	0.2 - 8.0
PL-100	Board Intake[1]	0.2 - 8.0
PL-101	In-Line Saw	0.2 - 8.0

[1] – Vents inside building.

   A. All air discharges processed by the fabric filters (baghouses), or equivalent PM control devices, shall control emissions with 99% or greater control efficiency. [OAC 252:100-25]
   B. Baghouses shall be operated in the pressure differential range above per manufacturer specifications. The pressure differential of each baghouse shall be recorded at least once per operating day. [OAC 252:100-43]
      i. If pressure differential readings are outside the range, then visible emissions shall be observed (using Reference Method 9 or Reference Method 22), and then opacity readings shall be performed to ensure compliance. In addition, in the event of any malfunctioning system, records of work orders shall be maintained. [OAC 252:100-8-6(a)(3)]
      ii. This requirement does not apply to any baghouses vented inside a building. [OAC 252:100-8-6(a)(3)]

C. Each air pollution control device shall be maintained in accordance with the manufacturer's specifications, which shall be kept on-site and made available to inspection staff upon request An alternate pollution control device may be used provided that the new system has an efficiency equal to greater than the replaced system. [OAC 252:100-8-6(a)(3)]

5. The natural gas-fired units at this facility shall be fueled with pipeline natural gas. Compliance can be shown by the following method: for pipeline grade natural gas, a current gas company bill. Compliance shall be demonstrated at least once every calendar year. [OAC 252:100-31]

6. The permittee is authorized to operate the facility continuously, 24 hours per day, every day of the year. [OAC 252:100-8-6(a)]

7. The permittee shall comply with NSPS, 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants, for the affected facilities in this group including but not limited to: [40 CFR Part §§ 60.670-60.676]

A. § 60.670 Applicability and designation of affected facility.
B. § 60.671 Definitions.
C. § 60.672 Standard for particulate matter (PM).
   i. Affected facilities must meet the stack emission limits and compliance requirements in Table 2 of 40 CFR Part 60, Subpart OOO. The requirements in Table 2 of 40 CFR Part 60, Subpart OOO apply for affected facilities with capture systems used to capture and transport particulate matter to a control device. [§ 60.672(a)]

      (a) For affected facilities that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008, the owner or operator must meet a PM limit of 0.05 g/DSCM (0.022 gr/DSCF) and an opacity limit of 7% for dry control devices.
      [Table 2 of 40 CFR Part 60, Subpart OOO]
      (b) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, the owner or operator must meet a PM limit of 0.032 g/DSCM (0.014 gr/DSCF).
      [Table 2 of 40 CFR Part 60, Subpart OOO]
      (c) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, the owner or operator must demonstrate compliance with these limits by conducting monitoring of baghouses according to §60.674(c), (d), or (e) and §60.676(b).
      [Table 2 of 40 CFR Part 60, Subpart OOO]
   ii. Affected facilities must meet the fugitive emission limits and compliance requirements in Table 3 of 40 CFR Part 60, Subpart OOO. The requirements in Table 3 of 40 CFR Part 60, Subpart OOO apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems. [§ 60.672(b)]
      (a) For affected facilities that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008,

(1) The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility 10% opacity; and

(2) The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used 15% opacity.

[Table 3 of 40 CFR Part 60, Subpart OOO]

(b) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008,

(1) The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility 7% opacity; and

(2) The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used 12% opacity.

[Table 3 of 40 CFR Part 60, Subpart OOO]

(c) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, the owner or operator must demonstrate compliance with these limits by conducting a repeat performance test according to §60.11 and §60.675 within 5 years from the previous performance test for fugitive emissions from affected facilities without water sprays. [Table 3 of 40 CFR Part 60, Subpart OOO]

iii. If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in § 60.672(a) and (b), or the building enclosing the affected facility or facilities must comply with the following emission limits: [§ 60.672(e)]

(a) Fugitive emissions from the building openings (except for vents) must not exceed 7% opacity; and [§ 60.672(e)(1)]

(b) Vents in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of 40 CFR Part 60, Subpart OOO.

[§ 60.672(e)(2)]

iv. Any baghouse that controls emissions from only an individual, enclosed storage bin is exempt from the applicable stack PM concentration limit (and associated performance testing) in Table 2 of Subpart OOO but must meet the applicable stack opacity limit and compliance requirements in Table 2 of Subpart OOO.

[§ 60.672(f)]

D. § 60.673 Reconstruction.
E. § 60.674 Monitoring of operations.
F. § 60.675 Test methods and procedures.
G. § 60.676 Reporting and recordkeeping.
H. Table 1 to Subpart OOO - Exceptions to Applicability of Subpart A to Subpart OOO
I. Table 2 to Subpart OOO - Stack Emission Limits for Affected Facilities With Capture Systems
J. Table 3 to Subpart OOO - Fugitive Emission Limits

8. The emission of particulate matter from any emission point in an industrial process shall not exceed the limits specified in OAC 252:100 Appendix G. [OAC 252:100-19]

9. No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. [OAC 252:100-25]

10. Emissions of nitrogen oxides (calculated as nitrogen dioxide) from the wallboard dryer shall not exceed 0.20 lb/MMBTU (86 ng/J) heat input, three-hour average. Compliance with this requirement is demonstrated through exclusive combustion of natural gas by the Wallboard Dryer burners. [OAC 252:100-33]

11. Reasonable precautions shall be taken to minimize fugitive dust emissions from loading and unloading operations. These precautions shall include, but not be limited to: [OAC 252:100-29]

    A. The application of water or suitable chemicals or some other covering on materials stockpiles and other surfaces that can create air-borne dusts under normal conditions;
    B. The installation and use of hoods, fans and dust collectors to enclose and vent the handling of dusty materials or the use of water sprays or other acceptable measures to suppress dust emission during handling;
    C. The covering or wetting of open-bodied trucks, trailers, or railroad cars when transporting dusty materials in areas where the general public must have access;
    D. The removal as necessary from paved street and parking surfaces of materials that have a tendency to become airborne;
    E. The planting and maintenance of vegetative ground cover as necessary; and
    F. Curtail operations to the extent necessary to comply with the emissions limitations.

12. The following records shall be maintained on-site to verify insignificant activities. No records are required for trivial activities. [OAC 252:100-43]

    A. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTUH heat input (commercial natural gas).
    B. Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
    C. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant; the type of activity and the amount of emissions from that activity (cumulative annual).

13. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6(a)(3)]
    A. Natural gas usage (monthly and 12-month rolling total).
    B. Stucco used in the process (monthly and cumulative annual).

C. Production of gypsum wallboard (by product type) (monthly and cumulative annual).
D. Differential pressure readings for each baghouse or other appropriate parameter or check to ensure proper operation of the control device (daily when operating).
E. Maintenance records on air pollution control devices (baghouses).
F. Inspection and maintenance of baghouses (weekly).
G. Compliance with emission limits (monthly and 12-moth rolling total).
H. For fuel(s) burned, the appropriate document(s) as described in Specific Condition 5.
I. Records as required by NSPS 40 CFR Part 60, Subparts OOO and IIII.
J. Records as required by NESHAP 40 CFR Part 63, Subparts ZZZZ.
K. Records of insignificant activities.

14. Within 180 days of commencement of operation of the modifications authorized by this construction permit, the owner/operator shall submit an administratively complete operating permit application to incorporate these modifications into the Title V operating permit.
[OAC 252:100-8-4(b)(5)]

DRAFT/PROPOSED

PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 N. ROBINSON, SUITE 4100
P.O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 93-065-C (M-16)

Georgia-Pacific Gypsum LLC

having complied with the requirements of the law, is hereby granted permission to construct all the sources within the boundaries of the Fletcher Gypsum Wallboard Manufacturing Plant located in Section 11, Township 4N, Range 10W, Comanche County, Oklahoma, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

In the absence of commencement of construction, this permit shall expire 18 months from the issuance date, except as authorized under Section VIII of the Standard Conditions.

Kendal Stegmann, Division Director **Date**

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Ms. Nyna Saenz, Environmental Manager
Georgia-Pacific Gypsum LLC
16850 NE 135th Street
Fletcher, Oklahoma 73541

Subject: Construction Permit No. **93-065-C (M-16)**
Fletcher Gypsum Wallboard Plant (Fac. ID: 1494)
Section 11, Township 4N, Range 10W; Comanche County, Oklahoma

Dear Ms. Saenz:

Enclosed is the permit authorizing construction of the referenced facility above. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation in this matter. If we may be of further service, please contact me at Ryan.Buntyn@deq.ok.gov, or at 405-702-4213.

Sincerely,

Ryan Buntyn, P.E.
Existing Source Permits Section
AIR QUALITY DIVISION

Enclosures

MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.
[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.
[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

(1)the date, place and time of sampling or measurement;
(2)the date or dates analyses were performed;
(3)the company or entity which performed the analyses;
(4)the analytical techniques or methods used;
(5)the results of such analyses; and
(6)the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM_{10}). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.
[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.
[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.
[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
(3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
(4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.
[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.
[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

(2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]

(a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
(b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
(c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
(d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be

certified by an approved technician certification program pursuant to § 82.161;

(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;

(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and

(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.

(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).

(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).

(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).

(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.

(6) The DEQ complies with 40 C.F.R. § 70.8(d).

(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).

(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.

(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
7-1-20

ACFM	Actual Cubic Feet per Minute
AD	Applicability Determination
AFRC	Air-to-Fuel Ratio Controller
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BHP	Brake Horsepower (bhp)
BTU	British thermal unit (Btu)
C&E	Compliance and Enforcement
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS	Chemical Abstract Service
CAAA	Clean Air Act Amendments
CC	Catalytic Converter
CD	Consent Decree
CEM	Continuous Emission Monitor
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CI	Compression Ignition
CNG	Compressed Natural Gas
CO	Carbon Monoxide or Consent Order
COM	Continuous Opacity Monitor
D	Day
DEF	Diesel Exhaust Fluid
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)
EGU	Electric Generating Unit
EI	Emissions Inventory
EPA	Environmental Protection Agency
ESP	Electrostatic Precipitator
EUG	Emissions Unit Group
EUSGU	Electric Utility Steam Generating Unit
FCE	Full Compliance Evaluation
FIP	Federal Implementation Plan
FR	Federal Register
GACT	Generally Achievable Control Technology
GAL	Gallon (gal)
GDF	Gasoline Dispensing Facility
GEP	Good Engineering Practice
GHG	Greenhouse Gases
GR	Grain(s) (gr)
HAP	Hazardous Air Pollutants
HC	Hydrocarbon
HCFC	Hydroclorofluorocarbon
HON	Hazardous Organic NESHAP
HP	Horsepower (hp)
HR	Hour (hr)
H_2S	Hydrogen Sulfide
I&M	Inspection and Maintenance
IBR	Incorporation by Reference
IC	Internal Combustion
LAER	Lowest Achievable Emission Rate
LB	Pound(s) [Mass] (lb, lbs, lbm)
LB/HR	Pound(s) per Hour (lb/hr)
LDAR	Leak Detection and Repair
LNG	Liquefied Natural Gas
LT	Long Ton(s) (metric)
M	Thousand (Roman Numeral)
MAAC	Maximum Acceptable Ambient Concentration
MACT	Maximum Achievable Control Technology
MM	Prefix used for Million (Thousand-Thousand)
MMBTU	Million British Thermal Units (MMBtu)
MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
MMSCF	Million Standard Cubic Feet (MMscf)
MMSCFD	Million Standard Cubic Feet per Day
MSDS	Material Safety Data Sheet
MWC	Municipal Waste Combustor
MWe	Megawatt Electrical
NA	Nonattainment
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NH_3	Ammonia
NMHC	Non-methane Hydrocarbon
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NOI	Notice of Intent
NSCR	Non-Selective Catalytic Reduction
NSPS	New Source Performance Standards
NSR	New Source Review
O_3	Ozone
O&G	Oil and Gas
O&M	Operation and Maintenance
O&NG	Oil and Natural Gas
OAC	Oklahoma Administrative Code
OC	Oxidation Catalyst

PAH	Polycyclic Aromatic Hydrocarbons
PAL	Plant-wide Applicability Limit
Pb	Lead
PBR	Permit by Rule
PCB	Polychlorinated Biphenyls
PCE	Partial Compliance Evaluation
PEA	Portable Emissions Analyzer
PFAS	Per-and Polyfluoroalkyl Substance
PM	Particulate Matter
$PM_{2.5}$	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers
PM_{10}	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers
POM	Particulate Organic Matter or Polycyclic Organic Matter
ppb	Parts per Billion
ppm	Parts per Million
ppmv	Parts per Million Volume
ppmvd	Parts per Million Dry Volume
PSD	Prevention of Significant Deterioration
psi	Pounds per Square Inch
psia	Pounds per Square Inch Absolute
psig	Pounds per Square Inch Gage
RACT	Reasonably Available Control Technology
RATA	Relative Accuracy Test Audit
RICE	Reciprocating Internal Combustion Engine
RO	Responsible Official
ROAT	Regional Office at Tulsa
RVP	Reid Vapor Pressure
SCC	Source Classification Code
SCF	Standard Cubic Foot
SCFD	Standard Cubic Feet per Day
SCFM	Standard Cubic Feet per Minute
SCR	Selective Catalytic Reduction
SER	Significant Emission Rate
SI	Spark Ignition
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SNCR	Selective Non-Catalytic Reduction
SO_2	Sulfur Dioxide
SOx	Sulfur Oxides
SOP	Standard Operating Procedure
T	Tons
TAC	Toxic Air Contaminant
THC	Total Hydrocarbons
TPY	Tons per Year
TRS	Total Reduced Sulfur
TSP	Total Suspended Particulates
TV	Title V of the Federal Clean Air Act
$\mu g/m^3$	Micrograms per Cubic Meter
US EPA	U. S. Environmental Protection Agency
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRT	Vapor Recovery Tower
VRU	Vapor Recovery Unit
YR	Year
2SLB	2-Stroke Lean Burn
4SLB	4-Stroke Lean Burn
4SRB	4-Stroke Rich Burn

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

March 9, 2021

Ms. Nyna Saenz, Environmental Manager
Georgia-Pacific Gypsum LLC
16850 NE 135th Street
Fletcher, Oklahoma 73541

Subject: Construction Permit No. **93-065-C (M-16)**
Fletcher Gypsum Wallboard Plant (Fac. ID: 1494)
Section 11, Township 4N, Range 10W; Comanche County, Oklahoma

Dear Ms. Saenz:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish.

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed)
2. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility.
3. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation in this matter. If we may be of further service, or you have any questions about this permit, please contact the permit writer or me at (405) 702-4100.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosures

NOTICE OF DRAFT PERMIT
TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE on page 2.

SAMPLE NOTICE *(Italicized print is to be filled in by the applicant.)***:**

DEQ NOTICE OF TIER *…II or III…* **DRAFT PERMIT**

A Tier *…II or III…* **application for an air quality** *…type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)…* **has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant,** *…name and address.*

The applicant requests approval to *…brief description of purpose of application…* **at the** *…site/facility name … …***[proposed to be] located at** *…physical address (if any), driving directions, and legal description including county…***..**

In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: *…xx-xxx-x…***), which may be reviewed at** *…locations (one must be in the county where the site/facility is located)…* **or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: http://www.deq.ok.gov/**

This draft permit would authorize the facility to emit the following regulated pollutants: *(list each pollutant and amounts in tons per year (TPY))*

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: **Only those issues relevant to the proposed modification(s) are open for comment.**] **A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.**

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [For Construction Permits, add: **The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.**]

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: http://www.deq.ok.gov/.

For additional information, contact *…names, addresses and telephone numbers of contact persons for the applicant,* **or contact DEQ at: Chief Engineer, Permits & Engineering Group, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Texas Commission on Environmental Quality
Air Permits Division (MC 163)
P.O. Box 13087
Austin, TX 78711-3087

SUBJECT: Permit Number: **93-065-C (M-16)**
Facility: Fletcher Gypsum Wallboard Plant (Fac. ID: 1494)
Latitude 34.83993°N, Longitude 98.22983°W
Section 11, Township 4N, Range 10W; Comanche County, Oklahoma
Permit Writer: Ryan Buntyn

Dear Sir / Madame:

The subject facility has requested a major source construction permit permit. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma - **Texas** border, a copy of the draft permit will be provided to you upon request. The draft permit is also available for review on the Air Quality section of the DEQ web page at *https://www.deq.ok.gov*.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4217.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION