State of Idaho
Department of Environmental Quality
Air Quality Division

AIR QUALITY PERMIT
STATEMENT OF BASIS

Tier I Operating Permit No. T1-2011.0115

Project No. 60894

EC **Final**

Plummer Forest Products, Inc.

Post Falls, Idaho

Facility ID No. 055-00018

January 3, 2012

Eric Clark

Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

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Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
TAP	toxic air pollutant

Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. INTRODUCTION AND APPLICABILITY

Plummer Forest Products, Inc., Post Falls Facility is a particleboard manufacturing facility, and is located at 401 North Potlatch Road, Post Falls, Idaho 83877. The facility is classified as a major facility as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit NOx and VOCs above the major source threshold of 100 tons per year, respectively. The facility is not a major source of HAP emissions. As a major facility, Plummer Forest Products, Inc. is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Plummer Forest Products, Inc. as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09.)

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Plummer Forest Products, Inc., Post Falls Facility.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Tier I operating permit for Plummer Forest Products, Inc., Post Falls Facility is organized into sections. They are as follows:

Section 1 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 3 through 6 – Emissions Unit/Source Name

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 7 – Compliance Assurance Monitoring (CAM) Conditions

This section provides the requirements all CAM applicable units must meet. The Sanderdust boiler is the only unit at the Plummer Forest Products facility applicable to CAM. Details of the CAM plan are provided in this section along with general 40 CFR 64 requirements.

Section 8 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 9 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

2. FACILITY INFORMATION

2.1 Facility Description

This facility is a particleboard manufacturing facility.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Previous 5-year permit term January 17, 2007 to January 17, 2012

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from January 17, 2007 to January 17, 2012. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 17, 2007	Tier I Operating Permit No. T1-060110, T1 renewal (S)
March 8, 2007	Tier I Operating Permit No. T1-2007.0011, Administrative Amendment, correct typographical errors (S)
August 12, 2008	Tier I Operating Permit No. T1-2008.0095, Administrative Amendment, permit revision to acknowledge the change of Responsible Official and Facility Contact (S)
December 23, 2008	Tier I Operating Permit No. T1-2008.0187, Administrative Amendment, facility name change from Potlatch Corporation to Potlatch Forest Products Corp., Wood Products – Post Falls to Potlatch Land & Lumber – Post Falls (S)
January 22, 2010	Tier I Operating Permit No. T1-2010.0040, Administrative Amendment, an ownership change of the facility (A, but upon issuance of this permit it will be superseded (S)).

2.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 10, 1974	PTC, an initial PTC letter for the facility (A)
November 25, 1980	PTC letter issued; however, the equipment was never installed (S)
February 1, 1985	PTC No. 0860-0018, Initial PTC for a wood chip pre-dryer controlled with high efficiency cyclones; however, the equipment was never installed (S)
May 22, 2001	PTC No. 055-00018, PTC modification, cure monitor installation and annual particleboard production increase (S)
August 17, 2001	PTC No. 055-00018, PTC modification, replacing rotary dryer, cure monitor installation and annual particleboard production increase (S)
September 23, 2005	PTC No. P-050104, Permit modification, sanderdust project (S)
April 22, 2010	PTC No. P-2010.0042, PTC revision for ownership change of the facility (S)
TBD, 2011	PTC No. P-2010.0042, Project 60912, PTC revision to remove pressure drop monitoring requirements, update Tables 1 and 2 and updating performance testing schedule. (A)

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3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. A CAM plan for only the Sanderdust Boiler has been included. All other material handling equipment is no longer considered CAM applicable. Also, 40 CFR 63, Subpart JJJJJJ and Subpart ZZZZ requirements were included as there are affected sources at the facility. The underlying permit, P-2010.0042 was also updated, thus some changes in accordance with that revision has been incorporated in the Tier 1 Operating Permit.

3.2 Application Chronology

July 1, 2011	DEQ received a permit application
August 29, 2011	Application deemed complete
October, 12, 2011	DEQ provided the draft permit to the facility for review
October 26, 2011	DEQ provided a second draft period to the facility for review
November 4, 2011	DEQ provided the Tier I Operating Permit for public comment and affected states review. Public comment and affected states review ended on December 5, 2011.
December 14, 2011	DEQ provided the proposed permit to EPA Region 10 for review.
January 4, 2012	DEQ issued the final permit to the facility.

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

4.1 Process No. 1 – Sanderdust Boiler

Table 4.1 lists the emissions units and control devices associated with the Sanderdust Boiler.

Table 4.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)
44.4 MMBtu/hr Kipper and Sons Sander-Dust Boiler (30,000 lb steam/hr produced)	Multiclone and Electrostatic Precipitator

The boiler is fueled by biomass which comes from Sanderdust from the particleboard sander. The boiler is used to generate steam which then is used to power other processes throughout the facility. The boiler also has the ability to be fueled by natural gas.

4.2 Process No. 2 – Temporary Boiler

Table 4.2 lists the emissions units and control devices associated with the temporary boiler.

Table 4.2 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)
100 MMBtu/hr Propane or natural gas-fired boiler	None

This boiler is not currently in operation. However, if the unit were to become operational it would be subject to 40 CFR 60, Subpart Dc.

4.3 Process No. 3 – Wood Handling, Drying and Pressing

Table 4.3 lists the emissions units and control devices associated with wood handling, drying and pressing processes.

Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)
Drag Chain and Drag Chain Baghouse BH-1	None
Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	None
Outside Dry Silo	Outside Silo High Pressure Air System Baghouse BH-4
Blender, Former and Scalper Air System Baghouse BH-5	None
Board Cooler; Process Fugitives, Rip and Trim Saws	East Sawline Baghouse BH-9 West Sawline Baghouse BH-10
Board Trim and Reclaim Baghouse BH-3	None
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
Sander Air System Baghouse BH-7	None
Sanderdust Overs Baghouse BH-8	None
Boiler	Electrostatic Precipitator
Particle Dryer	Multiclone
Press	None

The particleboard manufacturing process relies on pneumatic transportation of fine wood particles from one part of the process to another. Baghouses are used throughout the pneumatic transport systems to separate fine wood particles from the transporting air streams. The baghouses are generally transfer points that move material from one point to another. When used as part of the transportation system, baghouses are considered process equipment rather than control equipment.

4.4 Process No. 4 – Emergency Fire Pump Engine

Table 4.4 lists the emissions units and control devices associated with the emergency fire pump engine.

Table 4.4 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)
Fire pump engine Compression Ignition, 208 bhp	None

The emergency engine is used to provide backup electrical power in the event that power from the local utility company is interrupted. The engine uses natural gas as fuel.

4.5 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 4.5 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 4.5 INSIGFIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
3,000 gallon diesel fuel tank	58.01.01.317.01.b.i(3)
One 250-gallon motor oil tank	58.01.01.317.01.b.i(1)
One 200-gallon tank ammonium sulfate solution	58.01.01.317.01.b.i(19)
Diesel fuel pump	58.01.01.317.01.b.i(2)
Maintenance shop welding	58.01.01.317.01.b.i(9)
275-gallon diesel fuel tank for emergency fire pump diesel engine	58.01.01.317.01.b.i(3)
15,000-gallon urea resin tank	58.01.01.317.01.b.i(20)
15,000-gallon urea resin tank	58.01.01.317.01.b.i(20)
15,000-gallon urea resin tank	58.01.01.317.01.b.i(20)
Welding vents in the maintenance shop	58.01.01.317.01.b.i(9)
6,000-gallon urea resin tank	58.01.01.317.01.b.i(20)
10,000-gallon ISO resin tank	58.01.01.317.01.b.i(20)
10,000-gallon ISO resin tank	58.01.01.317.01.b.i(20)

Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The facility has not requested a permit shield.

4.6 Emissions Inventory

Table 4.6 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed below Table 4.6 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix A of this statement of basis.

Table 4.6 EMISSIONS INVENTORY – POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM_{10}	$PM_{2.5}$	NO_X	SO_2	CO	VOC	HAP	CO_2e^1	CO_2e^2
Sanderdust Boiler	7.9	6.8	194.3	4.9	194.3	3.3	3.9	23,722	38,750
Handling Processes	109	24.4	0.0	0.0	0.0	140	13.8	0.0	0.0
Fire Pump	0.2	0.2	0.3	0.2	0.7	0.3	1.0E-04	2.0	2.0
TOTAL EMISSIONS	**117.1**	**31.4**	**194.6**	**5.1**	**195**	**143.6**	**17.7**	**23,724**	**38,752**

1. This CO_2e calculation assumes that CO_2 biogenic emissions from wood products are not accounted for in the calculation. CO_2 emissions from biogenic stationary sources have been deferred as of July 20, 2011for three years. The CO_2 component of CO_2e is assuming natural gas for the fuel, but wood waste for CH_4 and N_2O.

2. The second CO2e calculation assumes all emissions are from wood waste and the CO_2 component is included. Note that this was added to illustrate that CO_2e is well below the major source threshold 100,000 T/yr for PSD applicability regardless of the inclusion of biogenic CO_2.

All emissions illustrated in Table 4.6 were confirmed via an updated PTE spreadsheet submitted by Plummer Forest Products, Inc. on September 29, 2011. It should be noted that the emergency fire pump emissions assume that the unit is operating 100 hr/yr. While Plummer Forest Products, Inc. expects only 50 operating hours, the PTE was doubled to 100 hours for conservatism. This is due to the 50 hr/yr of nonemergency situations allowed by 40 CFR 63, Subpart ZZZZ. Also, the engine may run for a maximum of 100 hr/yr for testing and maintenance. The nonemergency hours are considered part of the 100 hours; therefore 100 hours is the maximum allowed outside emergency situations.

5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Sanderdust Boiler Emissions Limits;
- Process Handling Emissions Limits;
- Emergency Compression Ignition Engine Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix B for other options.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

5.1 Facility-wide Conditions

Permit Condition 2.1 – Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 2.2 through 2.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct a monthly facility-wide inspection of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.
- Records of each fugitive dust inspection and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 2.5 – Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 2.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State-only), 5/1/94]

Permit Condition 2.7 – Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 2.8)

- Conduct a monthly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units subject to the visible emissions standards.
- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.
    - Each inspection shall be conducted as follows:
        - Initial see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
            - Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

    OR

        - Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Permit Condition 2.9 – Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

MRRR

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

Permit Conditions 2.10-2.11 – Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422 Fax: (208) 769-1404

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

However, if performance testing is required, it is to be conducted in accordance with IDAPA 58.01.01.157, including any and all monitoring, recordkeeping and reporting requirements. Emissions-unit specific MRRR will be listed within the permit condition requiring performance testing permit condition.

Permit Condition 2.12 – Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.13 – Reports and Certifications

All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422 Fax: (208) 769-1404

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.14 – Fuel Burning Equipment PM Standards

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.15 – Distillate Fuel Oil Sulfur Content Limits

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

Permit Condition 2.15.1 – Coal Sulfur Content Limit

The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94]

MRRR – (Permit Condition 2.15.2)

The permittee shall maintain documentation of supplier verification of **distillate fuel oil/coal** sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 2.14 – Open Burning

The permittee shall comply with the *Rules for Control of Open Burning,* IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.15 – Renovation/Demolition

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.16 – Regulated Substances for Accidental Release Prevention

(a)
An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)
This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.17 – Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Plummer Forest Products, Inc. must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 2.18 and 2.19 – Federal Requirement General Provisions

These permit conditions include the general provisions associated with NSPS and NESHAP federal requirements.

Permit Conditions 2.20 – Incorporation of Federal Requirements by Reference

This permit condition was added specify that all federal requirements govern should there be a conflict between the content of the permit and the federal requirements.

5.2 Emissions Unit-specific Emissions Limits and MRRR

Emissions Unit No. 1

The Sanderdust Boiler is subject to 40 CFR 63, Subpart JJJJJJ. Therefore, the following conditions were added to account for that.

Permit Condition 3.3

The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart JJJJJJ and all applicable general provisions of 40 CFR 63 Subpart A.
Subpart JJJJJJ applies to existing industrial boilers located at area source of HAP emissions. Subpart JJJJJJ applies to the existing Sanderdust boiler.

Permit Condition 3.4

In accordance with 40 CFR 63.11196(a), the affected source must comply with the work practice or management practice standard of a tune-up of the National Emissions Standards for Hazardous Air Pollutants for Industrial Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ by March 21, 2012 and achieve compliance with the energy assessment requirement by March 21, 2014.

Permit Condition 3.5

In accordance with 40 CFR 63.11201(b), the affected source must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment that meets or is amended to meet the energy assessment requirements in Table 2 of this subpart satisfies the energy assessment requirement. The energy assessment must include:

- *A visual inspection of the boiler system,*
- *An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,*
- *Inventory of major systems consuming energy from affected boiler(s),*
- *A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,*
- *A list of major energy conservation measures,*
- *A list of the energy savings potential of the energy conservation measures identified,*
- *A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.*

MRRR – (Permit Condition 3.6)

In accordance with 40 CFR 63.11205(a), at all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

MRRR – (permit Condition 3.7)

In accordance with 40 CFR 63.11214(b), you must conduct a performance tune-up according to §63.11223(b) and must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

In accordance with 40 CFR 63.11214(c), you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.

MRRR – (permit Condition 3.8)

In accordance with 40 CFR 63.11223(a-b), you must conduct a biennial performance tune-up to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The tune-up shall include:

- *As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).*
- *Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.*
- *Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.*

- *Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.*
- *Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).*
- *Maintain onsite and submit, if requested by the Administrator, biennial report containing the following information:*
    - *The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.*
    - *A description of any corrective actions taken as a part of the tune-up of the boiler.*
    - *The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.*

If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

MRRR – (permit Condition 3.17)

In accordance with 40 CFR 63.11225(c), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified below.

- *Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.*
- *Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.*

Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

MRRR – (permit Condition 3.18)

In accordance with 40 CFR 63.11225(a)(4), you must submit the Notification of Compliance Status in accordance with §63.9(h) no later than 120 days after the applicable compliance date specified in §63.11196. In addition to the information required in §63.9(h)(2), your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

- *This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.*

- *This facility has had an energy assessment performed according to §63.11214(c).*

In accordance with 40 CFR 63.11225(b), you must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the following information: For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial compliance report instead of a semi-annual compliance report. The report must be submitted by March 15 if you had any instance described by the third bullet below.

- *Company name and address.*
- *Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.*
- *If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.*

The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

Emissions Unit No. 2

No permit conditions have been added or changed for the temporary boiler.

Emissions Unit No. 3

The underlying PTC was updated concurrently with this Tier 1 renewal. There are a few conditions within this section that reflect changes made to the PTC. Previous conditions pertaining to pressure drop monitoring and recordkeeping has been replaced with a baghouse Control System Procedures document because proper maintenance of the baghouse is a better and more efficient method of monitoring. CAM requirements have been removed as Plummer Forest Products, Inc. has demonstrated that all handling equipment meets the definition of Process Equipment rather than Control Equipment and none of the units exceed 100 T/yr of emissions.

Table 5.1

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	*Emissions Control Device*
Drag Chain and Drag Chain Baghouse BH-1	*None*
Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	*None*
Outside Dry Silo	*Outside Silo High Pressure Air System Baghouse BH-4*
Blender, Former and Scalper Air System Baghouse BH-5	*None*
Board Cooler; Process Fugitives, Rip and Trim Saws	*East Sawline Baghouse BH-9* *West Sawline Baghouse BH-10*
Board Trim and Reclaim Baghouse BH-3	*None*
Sanderdust Storage Silo	*Sanderdust Storage Silo Baghouse BH-6*
Sander Air System Baghouse BH-7	*None*
Sanderdust Overs Baghouse BH-8	*None*
Boiler	*Electrostatic Precipitator*
Particle Dryer	*Multiclone*
Press	*None*

Permit Condition 5.2

- *Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.*
- *Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.*

Permit Condition 5.4

No change shall be made to any non-wood additive such as resins, glue and any other adhesive associated with the press or sawline unless a new additive qualifies for exemption in accordance with IDAPA 58.01.01.220-223.

The testing requirement was removed because the one-time test was performed and accepted by DEQ. The results of the performance test are now being used as emission factors to establish HAPs emissions from the sawline and press vents. Assuming the current process for these units do not change and create an increase in emissions, the emission factors from the 2007 Performance Team are valid. This new condition reminds/requires PFP that should there be a change in the mode of operation that triggers a modification, PTC application or exemption determination needs to be submitted to DEQ. At which time, updated emission factors and/or performance test requirements will be revisited. The restriction to current additives was included to verify that any new resins added into the process were either exempted per 223 or a new permit modification was necessary. 223 requires that any current TAP incremental increase or a newly introduced TAP is below the Screening Emission Level. If they are not, a permit modification is required. Any new resin may not be representative of the emissions assumed in the application submitted for the previous permit, issued September 23, 2005. That was the permit that required the performance testing for formaldehyde, methanol and Total HAPs.

MRRR – (Permit Condition 5.6)

The permittee shall monitor and record the monthly and annual HAP emissions from the press vents and East & West Sawline baghouses using the emission factors and furnish usage records required by Permit Conditions 5.4 and 5.5, respectively, to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. The permittee shall monitor and record the monthly and annual HAP emissions from sander air system, particle dryer, and boiler using the furnish usage records required by Permit Condition 5.5 to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. Annual facility-wide HAP emissions, expressed in tons per year (TPY), shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

MRRR – (Permit Condition 5.7)

Within 60 days of permit issuance, the permittee shall have developed a Control System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the baghouses, transfer point boots/enclosures, and the transfer point water sprays. The Control System Procedures document shall be a permittee developed document independent of the manufacturer-supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Control System Procedures document shall describe the procedures that will be followed to comply with the maintenance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- *Procedures to determine if bags or cartridges are ruptured; and*
- *Procedures to determine if bags or cartridges are not appropriately secured in place.*
- *Air to Cloth Ratio Certification*

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the material transfer points at any time. At a minimum the document shall include:

- *Procedures to determine if spray bar is functioning properly; and*
- *Procedures to determine if water spray bar is appropriate for the application and secured in place.*

The Control System Procedures document shall also include, at a minimum, the following methodology used by the facility to handle fugitive dust emissions:

- *Use, where practical, of water, or chemical dust suppressant, for control of dust generated as a result of material handling or processing;*
- *Application of water, or chemical dust suppressant, by hardpiped, conical deluge, or mist, application systems, or equivalent;*
- *Application and use, where practical and as specified in the application materials, of shrouding of material transfer points;*
- *Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Containment methods shall be employed during mixing or drop operations;*

The permittee shall maintain records of the results of each control system inspections in accordance with Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Control System Procedures document shall be submitted to DEQ within 60 days of permit issuance to remain on file and shall contain a certification by a responsible official. A copy shall also remain on site. Any permittee or DEQ requested changes to the Control System Procedures document shall be submitted within 15 days of the change.

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, Idaho 83814

The Control System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Control System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

MRRR – (Permit Condition 5.8)

The permittee shall conduct weekly one-minute observations of each affected emissions point or source using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible particulate matter emissions are observed for any emissions point, a six-minute observation using EPA Method 9 shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Permit Condition 2.12. If four consecutive monthly Method 22 observations indicate that no visible particulate

matter emissions are observed from any of the four observations or if four consecutive monthly six-minute observations using Method 9 indicate that opacity is below 20% for each of the four six-minute observations, or any combination of four consecutive monthly Method 22 or Method 9 observations, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, the observation frequency reverts to monthly.

The frequency has been increased from monthly to weekly at the permittee's request.

Emissions Unit No. 4

The emergency engine is subject to 40 CFR 63 Subpart ZZZZ and permit conditions have been written to incorporate the applicable provisions.

Permit Condition 6.4

The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency compression ignition with a rated capacity of 208 bhp. Plummer Forest Products, Inc. maintains a Cummins, 6BTA5.9-F1, 208 bhp compression ignition engine onsite for emergency purposes.

Permit Condition 6.5

In accordance with 40 CFR 63.6595(a)(1), the affected source must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

Permit Condition 6.6

In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the engine. The permittee must meet the following requirements, except during periods of startup.

- *Change oil and filter every 500 hours of operation or annually, whichever comes first.*
- *Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.*

Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

MRRR – (Permit Condition 6.7)

On and after May 3, 2013, the permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Emissions Limitations permit condition in accordance with 40 CFR 63.6605.

MRRR – (Permit Condition 6.8)

In accordance with 63.6625(e)(3) and Table 6 of the subpart, on and after May 3, 2013, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

MRRR – (Permit Condition 6.9)

In accordance with 63.6625(f), on and after May 3, 2013, an existing emergency stationary RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

MRRR – (Permit Condition 6.10)

On and after May 3, 2013, the engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6625(h).

MRRR – (Permit Condition 6.11)

In accordance with 40 CFR 63.6625(i), on and after May 3, 2013, the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

MRRR – (Permit Condition 6.12)

In accordance with 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii). The paragraphs are as follows:

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) The permittee may operate the emergency RICE for the purposes of maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.

(iii) The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hour per year provided for maintenance and testing.

MRRR – (Permit Condition 6.13)

In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following Rice; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

MRRR – (Permit Condition 6.14)

Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ or Subpart A – General Provisions shall be submitted to the following address in accordance with 40 CFR 63.13:

Air Quality Permit Compliance
Coeur d'Alene Regional Office
Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

and

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

5.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Provision 1 – General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Provision 3 – General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

General Provision 5 – Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If Plummer Forest Products, Inc. files a request to modify, revoke, reissue, or terminate the permit, the

request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

General Provision 6 – Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

General Provision 7 – Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 8 – Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 9 - Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

General Provision 10 – Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

General Provision 11 – Changes Requiring Permit Revision or Notice.

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

General Provisions 12 and 13 – Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1) and (2)]

General Provision 14 – Inspection and Entry

Upon presentation of credentials, Plummer Forest Products, Inc. shall allow DEQ or an authorized representative of DEQ to do the following:

a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

General Provision 15 – New Requirements During Permit Term

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

General Provision 16 - Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

General Provision 17 – Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

General Provision 18 – Renewal

a. Plummer Forest Products, Inc. shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

General Provision 19 – Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

   i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

c. Nothing in this permit shall alter or affect the following:

   i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;

   ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and

   iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

General Provision 20 – Compliance Schedule and Progress Reports.

a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.

b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

General Provision 21 – Periodic Compliance Certification

Plummer Forest Products, Inc. shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

a. The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.

b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

   i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;

   ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

   iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

   iv. Such information as the Department may require to determine the compliance status of the emissions unit.

d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

General Provision 22 – False Statements

Plummer Forest Products, Inc. may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

General Provision 23 – No Tampering

Plummer Forest Products, Inc. may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

General Provision 24 – Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, Plummer Forest Products, Inc. shall submit reports of any required monitoring at least every six months. Plummer Forest Products, Inc's. semiannual reporting periods shall be from January 1 to June 30 and from July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

General Provision 25 – Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

General Provision 26 – Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

General Provision 27 - Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Kootenai which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_X, and Ozone. Reference 40 CFR 81.313.

6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

The facility is major for PM_{10}, NO_x, CO and VOC emissions. Therefore, a Title V operating permit is required.

6.3 PSD Classification (40 CFR 52.21)

The facility does not exceed 250 T/yr of any criteria pollutants nor does the facility exceed 100,000 T/yr of CO_2e. Therefore, Plummer Forest Products, Inc. is not classified as a PSD facility.

6.4 NSPS Applicability (40 CFR 60)

The temporary boiler is subject to 40 CFR 60, Subpart Dc if constructed after June 9, 1989, and the maximum heat input capacity is between 10 and 100 million Btu/hr. Upon the first use of the temporary boiler at the Plummer Forest Products, Inc. facility, the initial notification requirements of §60.48c(a) are applicable. The only other applicable requirement for a natural gas fired boiler is the fuel consumption recordkeeping of §60.48c(g). The NSPS requirements appear in Section 4 of the renewal permit.

6.5 NESHAP Applicability (40 CFR 61)

There are no applicable requirements.

6.6 MACT Applicability (40 CFR 63)

40 CFR 63 Subpart ZZZZ ..... NESHAPS for Stationary Reciprocating Internal Combustion Engines

§ 63.6585 Am I subject to this subpart?

You are subject to this Subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(c) An area source of HAP emissions is a source that is not a major source.

Plummer Forest Products, Inc. does operate an emergency engine periodically throughout the year and it is used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source thresholds of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined. This is assured by Permit Condition 5.2 within the associated permit.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The engine located at TransCanada is considered existing as it was constructed prior to 2006.

§ 63.6595 When do I have to comply with the subpart?

(a)(1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an ***existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.*** *If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.*

The applicable IC engine must be in compliance with the Subpart no later than May 3, 2013.

§ 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6601 What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions and the engine is not a 4-stroke lean burn spark ignition between 250 and 500 bhp. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6602 What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 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?

Compliance with the numerical emission limitations established in this Subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this Subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this Subpart and the operating limitations in Table 2b to this Subpart which apply to you.

Table 2b does not apply as it refers only to CI non-emergency engines greater than 500 bhp at area source facilities. Table 2d, however, identifies those limitations required by area sources to comply with the Subpart. The specifics of Table 2d require that the permittee perform regular maintenance on the applicable engine such as changing oil and filters every 500 operating hours, inspect air cleaner every 1,000 hours of operation and inspect all hoses and belts every 500 hours of operation. Each of the maintenance procedures shall occur at the indicated interval or annually, whichever occurs first.

§ 63.6604 What fuel requirements must I meet if I own or operate an existing stationary CI RICE?

If you own or operate an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel, you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. Existing non-emergency CI stationary RICE located in Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, or at area sources in areas of Alaska not accessible by the FAHS are exempt from the requirements of this section.

Plummer Forest Products, Inc. operates an emergency engine and the rating of the engine is less than 300 bhp; therefore this section does not apply to the facility.

§ 63.6605 What are my general requirements for complying with this Subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this Subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

When operating the applicable IC engine, it shall be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations at all times.

§ 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The engine located at Plummer Forest Products, Inc. is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

The engine located at Plummer Forest Products, Inc. is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

The engine located at Plummer Forest Products, Inc. is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6615 When must I conduct subsequent performance tests?

The engine located at Plummer Forest Products, Inc. is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6620 What performance tests and other procedures must I use?

The engine located at Plummer Forest Products, Inc. is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

The applicable IC engine needs to be operated in accordance with manufacturer's specifications or a maintenance plan may be developed that is consistent with good air pollution control practices.

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

A non-resettable meter shall be installed if not previously installed.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

Idle startup time may not exceed 30 minutes. Applicable emissions standards must be met following the allowable 30 minutes.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

This section allows Plummer Forest Products, Inc. to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection j of the subpart. Permit Condition 6.11 accounts for these.

§ 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. Therefore, this

section is not applicable.

§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. As a result data capture is not necessary. Therefore, this section is not applicable.

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

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

Section 9 of Table 6 of the subpart pertains to the emergency IC engine at Plummer Forest Products, Inc. Requirement work practices are accounted for within Permit Condition 6.6 of the associated permit.

(f) Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

The above requirements pertain specifically to emergency engines. Permit Condition 6.12 accounts for these.

§ 63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

This section of the subpart is not applicable to the engine at Plummer Forest Products, Inc. because it is designated as emergency. 63.6645(a)(5) explicitly exempts emergency engines from this requirement.

§ 63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you.

All required reporting is specified in Table 7. However, Table 7 does not include any requirements for emergency engines. Therefore, this section of the subpart is not applicable to Plummer Forest Products, Inc.

§ 63.6655 What records must I keep?

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Plummer Forest Products, Inc. needs to maintain records demonstrating that the engine is being operated in accordance an appropriate maintenance plan. Records of operational hours from the non-resettable meter must also be kept. Records should also include: how many hours were spent in emergency situations and demand response. These requirements are established in condition 6.13.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1)

These requirements are established in condition 6.13.

40 CFR 63 Subpart JJJJJJ NESHAPS for Industrial, Commercial, and Institutional Boilers Area Sources

§ 63.11193 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

The Sanderdust Boiler is an industrial boiler located at an area source of HAPs emissions. Therefore, Plummer Forest Products, Inc.is subject to this Subpart.

§ 63.11194 What is the affected source of this subpart?

(a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in §63.11200 and defined in §63.11237, located at an area source.

(b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.

The Sanderdust boiler is an affected source and is an existing source.

§ 63.11195 Are any boilers not subject to this subpart?

The types of boilers listed in paragraphs (a) through (g) of this section are not subject to this subpart and to any requirements in this subpart.

(a) Any boiler specifically listed as, or included in the definition of, an affected source in another standard(s) under this part.

(b) Any boiler specifically listed as an affected source in another standard(s) established under section 129 of the Clean Air Act.

(c) A boiler required to have a permit under section 3005 of the Solid Waste Disposal Act or covered by subpart EEE of this part (e.g., hazardous waste boilers).

(d) A boiler that is used specifically for research and development. This exemption does not include boilers that solely or primarily provide steam (or heat) to a process or for heating at a research and development facility. This exemption does not prohibit the use of the steam (or heat) generated from the boiler during research and development, however, the boiler must be concurrently and primarily engaged in research and development for the exemption to apply.

(e) A gas-fired boiler as defined in this subpart.

(f) A hot water heater as defined in this subpart.

(g) Any boiler that is used as a control device to comply with another subpart of this part, provided that at least 50 percent of the heat input to the boiler is provided by the gas stream that is regulated under another subpart.

The Sanderdust boiler does not meet any of the exemption requirements.

§ 63.11196 What are my compliance dates?

(a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management standard no later than March 21, 2012.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

Plummer Forest Products, Inc. has a Sanderdust boiler that is required to complete a tune-up and an energy assessment. This requirement is established in Permit Condition 3.4.

§ 63.11201 What standards must I meet?

(a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.

(b) You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets the requirements in Table 2 to this subpart satisfies the energy assessment portion of this requirement.

(c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.

(d) These standards apply at all times.

All requirements that are applicable to Plummer Forest Products, Inc. are defined in Table 2 of the Subpart. Permit Condition 3.5 describes all the specific requirements needed for the energy assessment. Other standards described in Table 2 are outlined in 63.11223. See Permit Condition 3.8 for details.

§ 63.11205 What are my general requirements for complying with this subpart?

(a) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

When operating the applicable boiler, it must be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations applies at all times. All other requirements stated in 63.11205 are not applicable to Plummer Forest Products, Inc. because the facility is not subject to any specific emission limits. Permit Condition 3.6 establishes the requirements.

§ 63.11210 What are my initial compliance requirements and by what date must I conduct them?

(c) For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2).

All compliance dates are previously defined in 63.11196.

§ 63.11211 How do I demonstrate initial compliance with the emission limits?

(a) For affected boilers that demonstrate compliance with any of the emission limits of this subpart through performance (stack) testing, your initial compliance requirements include conducting performance tests according to §63.11212 and Table 4 to this subpart, conducting a fuel analysis for each type of fuel burned in your boiler according to §63.11213 and Table 5 to this subpart, establishing operating limits according to §63.11222, Table 6 to this subpart and paragraph (b) of this section, as applicable, and conducting continuous monitoring system (CMS) performance evaluations according to §63.11224. For affected boilers that burn a single type of fuel, you are exempted from the compliance requirements of conducting a fuel analysis for each type of fuel burned in your boiler. For purposes of this subpart, boilers that use a supplemental fuel only for startup, unit shutdown, and transient flame

stability purposes still qualify as affected boilers that burn a single type of fuel, and the supplemental fuel is not subject to the fuel analysis requirements under §63.11213 and Table 5 to this subpart.

The Sanderdust boiler is an existing biomass and is not subject to any emission limits.

§ 63.11212 What stack tests and procedures must I use for the performance tests?

(a) You must conduct all performance tests according to §63.7(c), (d), (f), and (h). You must also develop a site-specific test plan according to the requirements in §63.7(c).

No stack tests are required for the Sanderdust boiler.

§ 63.11213 What fuel analyses and procedures must I use for the performance tests?

(a) You must conduct fuel analyses according to the procedures in paragraphs (b) and (c) of this section and Table 5 to this subpart, as applicable. You are not required to conduct fuel analyses for fuels used for only startup, unit shutdown, and transient flame stability purposes. You are required to conduct fuel analyses only for fuels and units that are subject to emission limits for mercury in Table 1 of this subpart.

(b) At a minimum, you must obtain three composite fuel samples for each fuel type according to the procedures in Table 5 to this subpart. Each composite sample must consist of a minimum of three samples collected at approximately equal intervals during a test run period.

(c) Determine the concentration of mercury in the fuel in units of pounds per million Btu of each composite sample for each fuel type according to the procedures in Table 5 to this subpart.

No fuel analyses are required for the Sanderdust boiler.

§ 63.11214 How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?

(b) If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.

Plummer Forest Products, Inc. is required to submit a Notification of Compliance for both the initial and subsequent boiler tune-ups and the energy assessment. This requirement is established in Permit Condition 3.7.

§ 63.11220 When must I conduct subsequent performance tests?

No performance tests are required.

§ 63.11221 How do I monitor and collect data to demonstrate continuous compliance?

Monitoring is not required.

§ 63.11222 How do I demonstrate continuous compliance with the emission limits?

There are no emission limit requirements.

§ 63.11223 How do I demonstrate continuous compliance with the work practice and management practice standards?

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a biennial performance tune-up according to paragraphs (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(b) You must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.

(4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.

(5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).

(6) Maintain onsite and submit, if requested by the Administrator, biennial report containing the information in paragraphs (b)(6)(i) through (iii) of this section.

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.

(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.

(iii) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

This section describes the work practice standards required for the Sanderdust boiler. Permit Condition 3.8 incorporates all the standards.

§ 63.11224 What are my monitoring, installation, operation, and maintenance requirements?

The Sanderdust boiler is not subject to any emission limits or monitoring requirements.

§ 63.11225 What are my notification, reporting, and recordkeeping requirements?

(a) You must submit the notifications specified in paragraphs (a)(1) through (a)(5) of this section to the delegated authority.

(1) You must submit all of the notifications in §§63.7(b): 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply to you by the dates specified in those sections.

(2) As specified in §63.9(b)(2), you must submit the Initial Notification no later than 120 calendar days after May 20, 2011 or within 120 days after the source becomes subject to the standard.

Plummer Forest Products, Inc. has complied with the Initial Notification requirement by submitting an Initial Notification form to EPA Region 10 prior to September 17, 2011. They will be required to submit Notifications of Compliance Status. This is established in Permit Condition 3.18.

(c) You must maintain the records specified in paragraphs (c)(1) through (5) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

(ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

Records must be kept that include: notifications, work practices, boiler tune-ups, fuel consumption and malfunction events. These requirements are established by Permit Condition 3.17.

§ 63.2230 What is the purpose of this subpart?

This subpart establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements.

40 CFR 63 Subpart DDDD NESHAPS for Plywood and Composite Wood Products

§ 63.2231 Does this subpart apply to me?

This subpart applies to you if you meet the criteria in paragraphs (a) and (b) of this section.

(a) You own or operate a PCWP manufacturing facility. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(b) The PCWP manufacturing facility is located at a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

Plummer Forest Products, Inc. is a PCWP manufacturing facility, but they have taken limits to remain below major HAP thresholds of 10 and 25 T/yr. Therefore, this subpart does not apply to the permittee.

40 CFR 63 Subpart DDDDD NESHAPS for Industrial, Commercial, and Institutional Boilers and Process Heaters

§ 63.7480 What is the purpose of this subpart?

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

§ 63.7485 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP as defined in §63.2 or §63.761 (40 CFR part 63, subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities), except as specified in §63.7491.

Plummer Forest Products, Inc. does operate an industrial boiler, but they have taken limits to remain below major HAP thresholds of 10 and 25 T/yr. Therefore, this subpart does not apply to the permittee.

6.7 CAM Applicability (40 CFR 64)

The previous Tier 1 permit assumed that all material handling baghouses were CAM applicable along with the Sanderdust boiler. However, it was determined that all baghouses at the facility are either process equipment as defined by the 1995 EPA Guidance letter outlining the criteria needed to be considered process equipment rather than control equipment. Also, for those units that are still control equipment, none exceed the 100 T/yr requirement for CAM to apply. See Appendix C of this Statement of Basis for further details regarding the determination.

The boiler is still applicable to CAM. Section 7 of the Tier 1 Operating Permit outlines these requirements. Indicators and appropriate ranges are defined as well as general monitoring and recordkeeping requirements.

6.8 Acid Rain Permit (40 CFR 72-75)

The acid rain provisions do not apply to this facility.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from November 4 to December 5, 2011. During this time, comments were not submitted in response to DEQ's proposed action.

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on December 14, 2011 via e-mail. On December 23, 2011, EPA Region 10 responded to DEQ via e-mail indicating they had no comments and the permit could be issued.

Appendix A – Emissions Inventory

Boiler Emission calculations

The Kipper and Sons Boiler is duel fuel fired on wood waste and natural gas.

A.1 – Boiler Hourly and Annual PTE for Pollutants When Combusting Wood Waste

Emission Unit	Rated Heat Input[1] MMBtu/hr	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/MMBtu)[2,3,4]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Boiler	44.35	8,760	$PM_{2.5}$	0.035	1.55	6.79
			PM_{10}	0.041	1.81	7.93
			SO_2	0.025	1.10	4.82
			NO_x	1.0	44.35	194.25
			CO	1.0	44.35	194.25
			VOC	0.017	0.75	3.29
			HAPs	0.02	0.89	3.90
			CO_2e[5]	--	8,846.53	38,747.80

1. The rated heat input is based on the total amount of annual heat input of the boiler and annual operation of 8,760 hr/yr. 388,524 MMBtu/yr was provided by the Plummer Forest Products, Inc.
2. CO and NO_x emissions are based on a factor of 1.0 lb/MMBtu which is an engineering estimate based on source tests.
3. All other pollutants are based on AP-42, Section 1.6. This includes Tables 1, 2 and 3.
4. HAP calculations are based on AP-42, Section 1.6 and NCASII sources. The factors of all HAP components are totaled into one factor.
5. Emission factors of CO_2, CH_4 and N_2O makeup the calculation of CO_2e. AP-42 Table 1.6-3 emissions are 0.021 lb/MMBtu, 0.013 lb/MMBtu and 195 lb/MMBtu for CH_4, N_2O and CO_2, respectively. Global Warming Potentials are 21 and 310 for CH_4 and N_2O. CO_2 was included in this calculation although biogenic emissions from biomass have been deferred for three years. The annual number illustrates that regardless of the inclusion of biogenic CO_2 emissions, CO_2e total does not exceed the Major Source threshold of 100,000 T/yr.

A.2 – Boiler Hourly and Annual PTE for Pollutants When Combusting Natural Gas

Emission Unit	Rated Heat Input[1] MMscf/yr	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/MMscf)[2,3]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Boiler	381	8,760	$PM_{2.5}$	5.7	0.25	1.10
			PM_{10}	5.7	0.25	1.10
			SO_2	0.6	0.03	0.13
			NO_x	100	4.35	19.05
			CO	84	3.65	15.99
			VOC	5.5	0.24	0.96
			HAPs	0.08	0.0035	0.016
			CO_2e[4]	--	5,250.94	22,999.12

1. The rated heat input is based on the total amount of annual heat input of the boiler and annual operation of 8,760 hr/yr. 381 MMscf/yr was provided by the Plummer Forest Products, Inc.
2. All pollutants are based on AP-42, Section 1.4, Table 2. $PM_{2.5}$ is assumed to be identical to PM_{10}.
3. The factors of all HAP components are totaled into one factor.
4. Emission factors of CO_2, CH_4 and N_2O makeup the calculation of CO_2e. AP-42 Table 1.4-2 emissions are 2.3 lb/MMscf, 2.2 lb/MMscf and 120,000 lb/MMscf for CH_4, N_2O and CO_2, respectively. Global Warming Potentials are 21 and 310 for CH_4 and N_2O. CO_2 was included in this calculation.

Emergency Fire Pump Emission Calculations

A.3 – Engine Hourly and Annual PTE for Pollutants When Combusting Diesel Fuel

Emission Unit	Engine Horsepower[1] bhp	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/bhp-hr)[2,3]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Emergency Engine	208	100	$PM_{2.5}$	0.0022	0.45	0.02
			PM_{10}	0.0022	0.45	0.02
			SO_2	0.00205	0.42	0.02
			NO_x	0.031	6.44	0.32
			CO	0.00668	1.38	0.07
			VOC[4]	0.00247	0.51	0.03
			HAPs	$9.6E^{-06}$	0.002	$9.98E^{-05}$
			CO_2e[5]	1.15	239.20	11.96

1. The engine horsepower was provided by the Plummer Forest Products, Inc. and confirmed with manufacturer specifications.
2. All pollutants are based on AP-42, Section 3.3, Table 1. $PM_{2.5}$ is assumed to be identical to PM_{10}.
3. The factors of all HAP components are totaled into one factor.
4. The VOC Emission factor is based the TOC exhaust factor from AP-42, Section 3.3, Table 1.
5. Emission factors of CO_2, CH_4 and N_2O makeup the calculation of CO_2e. AP-42 Table 3.1-1 emissions are 1.15 lb/bhp-hr for CO_2.

Material Handling Emission Calculations

A.4 – Particle Dryer Hourly and Annual PTE

Emission Unit	Furnish Amount[1]	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/ton,ODT or MSF furnish)[2,3]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Particle Dryer	143,076	8,760	$PM_{2.5}$	0.204	3.33	14.59
			PM_{10}	0.24	3.92	17.17
	126,684		VOC[4]	1.0	14.46	63.33
	96,000		HAPs	0.0675	0.73	3.20

1. The amount of furnish used is based on 143,076 T/yr as provided by the Plummer Forest Products, Inc. 126,684 has units on (oven dry ton) ODT furnish/yr and 96,000 is in units of (thousand square feet) MSF/yr.
2. Assume all PM is PM_{10} from multiclone-controlled source. The value is based on source tests and engineering judgment. Also, assume 85% of PM_{10} is $PM_{2.5}$ from multiclone-controlled source.
3. The VOC and HAPs emission factor is based on NCASI TB 771, Table 6.2.1.

A.5 – Press Vent Hourly and Annual PTE

Emission Unit	Furnish Amount[1]	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/ton, or MSF furnish)[2]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Press Vent 1	96,000	8,760	$PM_{2.5}$	0.0402	0.44	1.93
			PM_{10}	0.402	4.40	19.27
			VOC[4]	1.39	15.23	66.71
	143,076		HAPs	0.11	1.80	7.88

1. The amount of furnish used is based on 143,076 T/yr as provided by the Plummer Forest Products, Inc. 96,000 is in units of (thousand square feet) MSF/yr.
2. All particulate and VOC emission factors are from a source test on February 24, 1995 and assumes 10% of PM_{10} is $PM_{2.5}$. HAP emission factors are from a source test in 2007.

A.6 – Building Vents #2 & #3 Hourly and Annual PTE

Emission Unit	Furnish Amount[1]	Annual Hours of Operation (hr/yr)	Pollutants	Emission Factors (lb/ton furnish)[2]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Building Vent#2	143,076	8,760	$PM_{2.5}$	$1.01E^{-05}$	$1.65E^{-04}$	$7.23E^{-04}$
			PM_{10}	$1.01E^{-04}$	$1.65E^{-03}$	$7.23E^{-03}$
Building Vent#3	143,076		$PM_{2.5}$	$1.01E^{-05}$	$1.65E^{-04}$	$7.23E^{-04}$
			PM_{10}	$1.01E^{-04}$	$1.65E^{-03}$	$7.23E^{-03}$

1. The amount of furnish used is based on 143,076 T/yr as provided by the Plummer Forest Products, Inc.
2. All emission factors are based on AP-42 Chapter 13.2-4. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.

A.7 – Baghouse #1, #3 and #3A Hourly and Annual PTE

Emission Unit	Annual Hours of Operation (hr/yr)	Pollutants	Hourly Emissions (lb/hr)[1]	Annual Emissions (T/yr)
Drag Chain Baghouse #1	8,760	$PM_{2.5}$	0.36	1.58
		PM_{10}	3.60	15.8
Reclaim Baghouse #3		$PM_{2.5}$	0.16	0.72
		PM_{10}	1.63	7.16
Hammermill Cyclone BH #3A		$PM_{2.5}$	0.22	0.96
		PM_{10}	2.19	9.58

1. All emission factors are based on Conservative estimate used in ISO PTC modeling work. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.

A.8 – Baghouse #5 and #5A Hourly and Annual PTE

Emission Unit	Annual Hours of Operation (hr/yr)	Pollutants	Hourly Emissions (lb/hr)[1]	Annual Emissions (T/yr)
Scalper Air System BH #5	8,760	$PM_{2.5}$	0.043	0.45
		PM_{10}	0.43	4.51
Outside Silo Baghouse #5A		$PM_{2.5}$	0.103	0.19
		PM_{10}	1.03	1.88

1. All emission factors are based on Conservative estimate used in ISO PTC modeling work. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.

A.9 – Baghouse #5 and #5A Hourly and Annual PTE

Emission Unit	Annual Hours of Operation (hr/yr)	Pollutants	Hourly Emissions (lb/hr)[1]	Annual Emissions (T/yr)
Scalper Air System BH #5	8,760	$PM_{2.5}$	0.043	0.45
		PM_{10}	0.43	4.51
Outside Silo Baghouse #5A		$PM_{2.5}$	0.103	0.19
		PM_{10}	1.03	1.88

1. All emission factors are based on Conservative estimate used in ISO PTC modeling work. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.

A.10 – Baghouse #6, #7 and #8 Hourly and Annual PTE

Emission Unit	Annual Hours of Operation (hr/yr)	Pollutants	Hourly Emissions (lb/hr)[1]	Annual Emissions (T/yr)
Sanderdust Silo System BH #6	8,760	$PM_{2.5}$	0.04	0.19
		PM_{10}	0.43	1.88
Sanderdust Air Baghouse #7	8,760	$PM_{2.5}$	0.41	1.79
		PM_{10}	4.09	17.9
	96,000[2]	VOC[3]	1.48	6.48
		HAPs[4]	0.29	1.26
Sanderdust Overs Baghouse #8	8,760	$PM_{2.5}$	0.02	0.094
		PM_{10}	0.21	0.939

1. All emission factors are based on Conservative estimate used in ISO PTC modeling work. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.
2. Units of MSF/yr (thousand square feet per year).
3. Emission factors are based on NCASI TB 771, Table 6.4.1. Emission Factor of $1.35E^{-01}$ lb/MSF (sum of HAPs and THC).
4. Emission factors are based on NCASI TB 768 Table 6.3.1. Emission Factor of $2.62E^{-02}$ lb/MSF.

A.11 – Baghouse #10 and #10A Hourly and Annual PTE

Emission Unit	Annual Hours of Operation (hr/yr)	Pollutants	Hourly Emissions (lb/hr)[1]	Annual Emissions (T/yr)
East Sawline Baghouse #10A	8,760	$PM_{2.5}$	0.26	1.13
		PM_{10}	2.57	11.3
	96,000[2]	VOC[3]	0.35	1.54
		HAPs[4]	0.18	0.77
West Sawline Baghouse #10	8,760	$PM_{2.5}$	0.26	1.13
		PM_{10}	2.57	11.3
	96,000[2]	VOC[3]	0.35	1.54
		HAPs[4]	0.18	0.77

1. All emission factors are based on Conservative estimate used in ISO PTC modeling work. PM_{10} is assumed to be 100% of PM and $PM_{2.5}$ is 10% of PM_{10}.
2. Units of MSF/yr (thousand square feet per year).
3. Emission factors are based on NCASI TB 771, Table 6.4.1. Emission Factor of $3.20E^{-02}$ lb/MSF.
4. Emission factors are based on Stack test results on January 16, 2007. Emission Factor of $1.60E^{-02}$ lb/MSF.

Appendix B – Facility Comments for Draft Permit

Facility Comment 1: Ongoing HAP Source Testing Requirement

The current Tier I permit required a one-time testing campaign to establish HAPs emissions factors for the press vents and sawline baghouses. The current facility draft Tier I permit converts the one-time emissions factor development testing requirement into an on-going compliance testing requirement. **PFP requests that the ongoing HAP testing requirement contained in Tier I Condition 5.4 be eliminated.**

PFP has no reason to expect that the emission factors for the press vents or sawline baghouses will change over time. The primary source of HAP emissions in particleboard manufacture is wood heating and drying. The AP-42 and NCASI emission factors that are in common use throughout the industry have not been updated for years. So there is no reason the think the on-site emission factors need regular updating.

Additional information on the HAP emission calculations and potential to emit (PTE) values is presented in PFP's comments on the facility draft PTC Permit.

DEQ Response #1: The testing requirement has been removed as requested. DEQ has concluded that the concern of HAP emissions was related to a potential change or increase in HAP emissions associated with a change in operation of the press and sawline. The current emission factors used for demonstrating compliance with the 10 and 25 tpy HAP emission limits are valid under the operating methods used today. Should there be a future change in operation that results in an emission increase, a modification or exemption determination would be triggered in accordance with the State Air Rules. Therefore, the concern of DEQ will be addressed in any future permitting action. Thus, there is no need for future testing at this time. Note that emission factors and potential performance testing may be addressed during the next permitting action where a warranted.

Facility Comment 2: Minor Comments
Page 19, Conditions 3.6 – 3.8 revert to the CFR style, using the term "you" instead of the Idaho permit style which uses "the affected source" or "the permittee". PFP prefers the Idaho language.

Conditions 3.17 and 3.18 also use the term "you". PFP would prefer "the permittee".

Condition 4.5 still refers to "Potlatch". Please update to Plummer Forest Products.

Conditions 6.8 and 6.13 also use the term "you". PFP would prefer "the permittee".

Condition 7.5, page 35, references 40 CFR 63(b), which should be 40 CFR 64.3(b).

DEQ Response #2: The requested changes have been made.

Facility Comment 3: Emissions Group 3
Table 5.1 needs to be updated to be consistent with the updates to Table 1.1.

Table 5.2, row two: Should this reference PTC No. 050104, consistent with the following row?

PFP requests that Condition 5.4 be eliminated or returned to the original intent, as discussed in Comment 1 above.

PFP notes that the monthly observations in condition 5.14 have been replaced with weekly observations on Condition 5.8, as per PFP's request.

DEQ Response #3: The requested changes have been made.

Comment 4: Technical Analysis Report
Table 4.3 in the report needs to be updated to match Table 1.1 of the permit.

Table 5.1 from the permit is shown in Page 20, and also needs to be updated to match Table 1.1 of the permit.

DEQ Response #4: DEQ has made the requested updates.

Appendix C – Process Equipment Determination

IF 41347 $1,000

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DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

PLUMMER FOREST PRODUCTS
PARTICLEBOARD PLANT

August 3, 2011

Eric Clark, EIT
Air Quality Permit Engineer
Department of Environmental Quality
1410 N. Hilton Street
Boise, Idaho 83706

Re: Plummer Forest Products, PTC Modification Application

Dear Eric:

Plummer Forest Products (PFP) owns and operates a particleboard manufacturing plant at Post Falls, Idaho. The Post Falls mill is regulated under PTC P-2010.0042 and Tier I operating permit T1-2010.0040. PFP has filed a Tier I permit renewal application which requested changes to Tier I permit conditions that are based on conditions in the underlying PTC permit.

In response to PFP's requested changes in the Tier I renewal application, DEQ has advised that the PTC permit conditions first need to be revised through the PTC application process. PFP is submitting the attached Form CSPTC and Form GI for the PTC application. A check for the $1000 PTC application fee is also enclosed.

The Tier I permit application contained information showing that the compliance assurance monitoring (CAM) requirements did not apply to many of the emitting units at the facility because they are process equipment rather than control equipment. This letter provides additional information regarding the function of material handling baghouses in the particleboard manufacturing system, and demonstrates why PFP considers these baghouses to be process equipment. In cases where PFP considers the baghouse to be process equipment, a three-step evaluation is provided based on the EPA guidance letter provided by Idaho DEQ (David Solomon, Letter to Timothy Mohin, November 27, 1995).

Particleboard Manufacturing Background

The particleboard manufacturing process uses very small, dry particles of wood (furnish) to create the product. At the Post Falls mill, sanderdust from the particleboard sander is used as fuel in the boiler. The wood furnish and sanderdust fuel is too fine to be transported by any means other than pneumatic conveying. The particleboard plant uses pneumatic transportation systems to contain and capture the process material and to push or pull it through the manufacturing system.

The particleboard manufacturing process relies on pneumatic transportation of fine wood particles from one part of the process to another. Baghouses are used throughout the pneumatic transport systems to separate fine wood particles from the transporting air streams. The baghouses are generally transfer points that move material from one point in the process to another. When used as part of the transportation system, baghouses are process equipment rather than emissions control equipment.

Process Equipment Determination

In the following sections, the purpose of each baghouse is described. In cases where PFP considers the baghouse to be process equipment, a three-step evaluation is provided based on the EPA guidance letter (David Solomon, Letter to Timothy Mohin, November 27, 1995). According to the EPA guidance letter on process equipment, the following list of questions should be considered in making such case-by-case

judgments as to whether certain devices or practices should be treated as pollution controls or as inherent to the process:

1. Is the primary purpose of the equipment to control air pollution?
2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?
3. Would the equipment be installed if no air quality regulations are in place?

The evaluation of these criteria has been combined with the CAM applicability information submitted with the Tier I renewal application. Emissions calculations for controlled emitting units that use emissions control technology are attached to this letter. The emitting units are discussed in the order they are listed in Table 1.1 of the PTC.

Drag Chain and Drag Chain Baghouse BH-1

The Drag Chain is a material handling system, and the Drag Chain Baghouse BH-1 is a transfer point in that system. Each of the questions related to whether or not BH-1 is process equipment is answered below:

1. The primary purpose of BH-1 is to separate wood particles from the transporting air stream so it can be transferred to another point in the manufacturing process.
2. BH-1 separates process material from the transport stream for use in the process. It does not recover material that would otherwise be lost to the atmosphere.
3. BH-1 would be installed even if no air quality regulations were in place. If it were not installed, wood chips could not be transported to the next processing point.

The answers to the three guideline questions show that BH-1 is process equipment. The emitting unit is the 'Drag Chain and Drag Chain Baghouse BH-1.' The facility does not rely on additional control equipment to meet emissions standards from this source, and the CAM rule does not apply.

Hammermills, Cyclone and Baghouse BH-2

The Hammermill Baghouse BH-2 is part of the material handling and separation process for the screening and grinding process. This baghouse was labeled BH-3A in the PTC, but the preferred label is BH-2. Ground up wood from the hammermill is first blown to a cyclone, where the larger pieces are removed from the air stream for further processing. The air stream then carries the smaller furnish pieces to the baghouse where they are separated from the transport air for use in the manufacturing process.

Each of the questions related to whether or not BH-2 is process equipment is answered below:

1. The primary purpose of BH-2 is to separate finely ground wood from the transporting air stream so it can be used in the manufacturing process.
2. BH-2 separates process material from the transport stream for use in the process. It does not recover material that would otherwise be lost to the atmosphere.
3. BH-2 would be installed even if no air quality regulations were in place. If it were not installed, fine material could not be transported from the hammermill for use in the process and the system would not function.

The answers to the guideline questions show that BH-2 is process equipment. The emitting unit is the 'Rotex Screen #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2.' This emitting unit has no emissions control device. Because the facility does not rely on additional control equipment to meet emissions standards from this emitting unit, the CAM rule does not apply to BH-2.

Outside Silo High Pressure Air System Baghouse BH-4

This baghouse should be labeled BH-4, not BH-5A. The Outside Silo High Pressure Air System Baghouse BH-4 is emissions control equipment. This baghouse controls emissions from the outside dry silo vent and removes particulate matter from the silo vent stream before it is exhausted to the atmosphere.

The emissions source is the 'Outside Dry Silo', and BH-4 is the control equipment. If BH-4 were not in place, silo vent emissions would be uncontrolled. Estimated uncontrolled PM emissions from the silo vent are 29 tpy, and estimated uncontrolled PM_{10} emissions are 16 tpy. Because the uncontrolled PM and PM_{10} emissions are less than 100 tpy, the Outside silo High Pressure Air System Baghouse BH-4 is not subject to the CAM rule.

Scalper Air System Baghouse BH-5

The Scalper Air System Baghouse BH-5 is part of the forming process. The pneumatic transport system and baghouse recycles excess material scraped off the top of the mat to obtain the required thickness. The scalper air system is designed to collect and reuse furnish material from the forming process.

Each of the questions related to whether or not BH-5 is process equipment is answered below:

1. The primary purpose of BH-5 is to separate particleboard furnish material from the collecting and transporting air stream so it can be used in the manufacturing process.
2. BH-5 separates process material from the transport stream for use in the process. This portion of the manufacturing process is designed with the return pneumatic transport loop. Therefore, the baghouse does not recover material that would otherwise be lost to the atmosphere.
3. The pneumatic transport system that includes BH-5 would be installed even if no air quality regulations were in place. If it were not installed, the forming system would need to be redesigned.

The answers to the guideline questions show that BH-5 is process equipment. The emitting unit is the 'Blender, Former and Scalper Air System Baghouse BH-5.' There is no emissions control device. BH-5 is process equipment and is not subject to the CAM rule.

East and West Sawline Baghouses, BH-9 and BH-10

The East and West Sawline Baghouses are emissions control equipment used to control emissions from the pneumatic dust collection system on the sawline and associated processes. The PTC identifies the East Sawline Baghouse as BH-10A, but it should be BH-9.

If the pneumatic collection system and baghouses were not in use, sawdust would fall to the mill floor and fugitive dust would be emitted to the atmosphere. The emissions unit is the 'Board Cooler, Process Fugitives, Rip and Trim Saws.' Estimated uncontrolled fugitive emissions from the sawline sources would be 24 tpy PM and 14 tpy PM_{10}. Because the uncontrolled emissions would be less than 100 tpy, the East and West Sawline Baghouses are not subject to the CAM rule.

Reclaim Baghouse, BH-3

The Reclaim Baghouse BH-3 recycles furnish material to be returned to the forming process, including trim mats and material that falls to the floor. The furnish material is reclaimed pneumatically through the baghouse and reused in a continuous process.

Each of the questions related to whether or not BH-3 is process equipment is answered below:

1. The primary purpose of BH-3 is to separate particleboard furnish material from the collecting and transporting air stream so it can be used in the manufacturing process.
2. BH-3 separates process material from the transport stream for use in the process. This portion of the manufacturing process is designed with the return pneumatic transport loop. Therefore, the baghouse does not recover material that would otherwise be lost to the atmosphere.
3. BH-3 and the rest of the reclaim pneumatic transport system would be installed even if no air quality regulations were in place. Without this system, the manufacturing process would have to be redesigned.

The answers to the guideline questions show that BH-3 is process equipment. The emitting unit is the 'Board Trim and Baghouse BH-3', and there is no emissions control device. Because BH-3 is process equipment it is not subject to the CAM rule.

Sanderdust Storage Silo Baghouse BH-6

The Sanderdust Storage Silo Baghouse BH-6 is control equipment used to control particulate emissions from the Sanderdust Storage Silo. If BH-6 were not in place, emissions from the silo vent would be uncontrolled. Estimated uncontrolled emissions from the Sanderdust Storage Silo are 6.2 tpy PM and 3.1 tpy PM_{10}. Because the uncontrolled emissions are less than 100 tpy, BH-6 is not subject to the CAM rule.

Sander Air System Baghouse BH-7

The Sander Air System Baghouse BH-7 is process equipment. This baghouse is part of the pneumatic transport system that captures all the sanderdust as it is sanded off the panels. The sanderdust separated in the baghouse is dropped out thru a feeder into a high pressure blower line which sends it to the sanderdust silo. The Sander Air System Baghouse BH-7 is process equipment because it is required to operate the sanderdust handling system.

Each of the questions related to whether or not BH-7 is process equipment is answered below:

1. The primary purpose of BH-7 is to transport sanderdust for use as fuel in the boiler. It is not air pollution equipment because it is used as part of the pneumatic sanderdust transport system.
2. BH-7 allows the recovery of sanderdust for boiler fuel. Even if the sanderdust were not used as fuel, it would have to be transported using a pneumatic system and a baghouse would be needed to separate the sanderdust from the air stream. The EPA guideline asks for an evaluation of the cost of the recovering the material compared to the cost of the equipment. In this case, baghouse is required even if sanderdust is not used as fuel, so there is no additional cost for recovery.
3. BH-7 and the rest of the sanderdust pneumatic transport system would be installed even if no air quality regulations were in place. Without this system, the sanderdust could not be used as fuel in the boiler which would create a waste stream and increase energy costs.

The answers to the guideline questions show that BH-7 is process equipment. The emitting unit is the 'Sander Air System Baghouse BH-7' and there is no emissions control device. Because BH-7 is process equipment it is not subject to the CAM rule.

Sanderdust Overs Baghouse BH-8

The Sanderdust Overs Baghouse BH-8 is a transfer point in the transport and separation of oversized pieces collected in the sifter screen. This baghouse is part of the material handling system and is process equipment.

Each of the questions related to whether or not BH-8 is process equipment is answered below:

1. The primary purpose of BH-8 is to separate oversized sanderdust pieces from the collecting and transporting air stream.
2. BH-8 separates material from the transport stream for processing and use as fuel. The mill relies on the pneumatic transport system for sanderdust handling, and BH-8 does not recover material that would otherwise be lost to the atmosphere.
3. BH-8 and the rest of the sanderdust fuel system and would be installed even if no air quality regulations were in place.

The answers to the guideline questions show that BH-8 is process equipment. The emitting unit is the 'Sanderdust Overs Baghouse BH-8', and there is no emissions control device. Because BH-8 is process equipment it is not subject to the CAM rule.

Boiler Multiclone and ESP

The Boiler is an emitting unit that is subject to particulate matter emission limits, and uses a multiclone and electrostatic precipitator (ESP) to meet that limit. The boiler likely has pre-control potential emissions of more than 100 tpy of particulate matter. Therefore, the CAM regulations apply to the boiler. A Form CAM for the multiclone and ESP was provided in the Tier I application.

Particle Dryer and Multiclone

The Particle Dryer is the emitting unit and the multiclone is emissions control equipment. If the multiclone were not in place, uncontrolled PM emissions from the particle dryer would be 36 tpy and uncontrolled PM_{10} emissions and would be 18 tpy. Because the uncontrolled emissions would be less than 100 tpy, the Particle Dryer Multiclone is not subject to the CAM rule.