Bennett Lumber Products, Inc Tier I air permit renewal application guide

This document accompanies the delivery of the electronic application for a renewal of Bennett Lumber Products current Tier I air permit, T1-2014.0031, verifying how the details of the application fit together to be complete consistent with Idaho DEQ guidance and the September 2021 check with the IDEQ air permitting hotline. The acceptability of the physical nature of this submittal was verified by IDEQ permit writer Kelli Wetzel via the IDEQ Permitting Hotline.

The base of the application is in file “BLP Tier 1 air permit renewal application base”, provided in Word and PDF versions in the base directory of the submittal CD.

Directory Appendix A of the permit application includes the IDEQ forms required for the application. A signed copy of form GI certifying the application is included in Appendix A, and in printed form accompanying the mailed CD with the application.

Appendix B, with the equipment list, is a simple Word document

Directory Appendix C includes the IDEQ Permit Application Completeness Checklist, which specifically documents where in the application all required information can be found.

Directory Appendix D includes the Potential To Emit calculations. The data is presented in Excel form so that the derivation of the calculations can be followed. Numerous references are included to document the derivation of emission factors.

Directory Appendix E includes the detailed federal Regulatory Applicability analyses required.

Directory Appendix F includes the required Compliance Certification, in the form of IDEQ form AQ-C2 for 2021 up the point of application submittal. Similar AQ-C2 forms for previous years are in IDEQ files.

We understand this application to be complete, and to justify the Tier I air permit renewal requested. If any further information or interpretation is required, please contact Jeff Abbott, Plant Engineer, at (208) 875-1121, or Chris Johnson of CJ Environmental at 208 628-4036 or cjenv@hotmail.com.
Please see instructions on second page before filling out the form.

**FACILITY AND PERMIT INFORMATION**

<table>
<thead>
<tr>
<th>1. Facility Name:</th>
<th>2. Facility ID Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Products</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Brief Project Description:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Tier 1 AQ Operating Permit Renewal</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. Facility Contact Name:</th>
<th>5. Facility Contact Title:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeff Abbott</td>
<td>Plant Engineer</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Facility Contact Telephone Number:</th>
<th>7. Facility Contact Email:</th>
</tr>
</thead>
<tbody>
<tr>
<td>208-875-1121</td>
<td><a href="mailto:jeff@blpl.com">jeff@blpl.com</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>8. Mailing address where permit will be sent (street/city/state/zip code):</th>
<th>9. Physical address of facility (if different than mailing address) (street/city/state/zip code):</th>
</tr>
</thead>
<tbody>
<tr>
<td>PO Box 130 Princeton, ID 83857</td>
<td>3759 HWY 6 Princeton, ID 83857</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10. County Facility is located:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latah</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>11. Is the equipment portable?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>12. NAICS codes</th>
<th>13. Brief business description and principal product produced:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary NAICS: 321912</td>
<td>Sawmill and Planer producing dimensional lumber</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>14. Describe any contiguous or adjacent facility this company owns or operates:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>15. Permit Application Type. Provide Permit Number for existing permit. For a PTC, an application fee is required.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Initial Permit to Construct (PTC) □ PTC Modification □ Tier I Permit</td>
<td>PTC No. Issued Date</td>
</tr>
<tr>
<td>□ Initial Tier I □ Tier I Modification □ Tier I Renewal</td>
<td>Tier I No. Issued Date</td>
</tr>
<tr>
<td>□ Initial Tier I □ Tier I Administrative Amendment</td>
<td>Tier I No. Issued Date</td>
</tr>
<tr>
<td>□ Tier I Minor Modification □ Tier I Significant Modification</td>
<td>03/23/2017</td>
</tr>
<tr>
<td>□ Tier I Renewal</td>
<td>03/23/2017</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>16. For Tier I permitted facilities only: If you are applying for a PTC then you must specify how the PTC will be incorporated into the Tier I permit.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Incorporate PTC at the time of Tier I renewal (IDAPA 58.01.01.209.05.a)</td>
<td></td>
</tr>
<tr>
<td>□ Co-process PTC with Tier I Modification (IDAPA 58.01.01.209.05.b)</td>
<td></td>
</tr>
<tr>
<td>□ Administrative amend the Tier I to incorporate PTC upon applicant's request (IDAPA 58.01.01.209.05.c)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>17. □ Check here to request facility draft permit before final issuances.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>18. □ Check here to request a permit hand-off meeting.</th>
</tr>
</thead>
</table>

**Certification of Truth, Accuracy, and Completeness (by Responsible Official)**

I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123 124.

Responsible Official Signature: [Signature]

Responsible Official Title: Plant Engineer

Date: 09/14/2021

Print or Type Responsible Official Name: Jeff Abbott
TIER 1 AIR PERMIT RENEWAL APPLICATION FOR
BENNETT LUMBER PRODUCTS, INC.
PRINCETON, IDAHO

Facility ID No. 003-00001

Prepared For:
Bennett Lumber Products, Inc.

Prepared By:
CJ Environmental

Submitted to:
Department of Environmental Quality
Air Quality Division
Stationary Source Program
1410 N. Hilton
Boise, Idaho 83706-1255

September 10, 2021
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1.0 INTRODUCTION

This Tier 1 air permit renewal application is being submitted by Bennett Lumber Products, Inc. (BLP) to meet Tier 1 air permit renewal requirements. The facility has only one air operating permit, incorporating a number of PTCs, none of which has been issued since the current Tier 1 air operating permit. The application documents proposed conditions in the Title V air permit renewal application.

The facility has a current Tier I Operating Permit (T1-2014.0031) that authorizes current and ongoing operations at the facility including operating a sawmill, lumber dry kilns, and a wood-fired boiler. No change in permitted activities or throughputs is proposed. Increases to Potential to Emit (PTE) and actual emissions associated with the proposed action are limited to changes in potential HAP and VOC emissions as a result of refined guidance from EPA Region X and Idaho DEQ. Tracking of HAP emissions has long been in place to verify the facility would not reach the HAP major source threshold. Appendix C includes a copy of the two IDEQ completeness checklists for this application.

The facility Emission Inventory (Tables 4-1 and 4-2 and in more detail in Appendix C and the PTE spreadsheet provided electronically) shows that facility-wide emissions will remain safely below the 250 ton per year criteria pollutant major source category threshold for this non-designated facility, but above the 100 ton per year threshold for Title V major sources as a result of the proposed action. Our emission estimates show potential HAP emissions could be above the HAP major source threshold. We request current tracking of actual rolling 12 month HAP emissions to verify the facility does not reach the HAP major source threshold be maintained.

1.1 Project Location

The Bennett Lumber Products facility is located on Idaho Highway 6 outside Princeton, Idaho. The facility operations are centered near 46.918° North latitude and 116.773° West longitude. Figure 1-1 is a Google Earth figure showing the facility and its location.

Figure 1-1 Facility location
1.2 Application Forms and Checklists

This report and accompanying forms and data comprise the application package required by Idaho Administrative Code (IDAPA) 58.01.01.314, Required Standard Application Form and Required Information.

The following sections and corresponding appendices are ordered with respect to the DEQ application completeness checklist. The signed General Information (GI) Form for this facility can be found in Appendix A along with the site location map and process flow diagram. Equipment-specific application forms are included in Appendix B. A printout of the complete facility-wide emissions inventory and an emissions inventory report are included in Appendix D. Federal regulatory review is included in Appendix E.

All forms required to support this application are provided in electronic format on the submittal disk in the directory Appendix A. Appendix C includes a checklist verifying all required forms, as well as text showing how each requirement is met.

1.3 Process Description

Bennett Lumber Products, Inc. (BLP), is a saw and planing mill that produces dimensional lumber, wood chips, hog-fuel, and wood shavings. The facility includes one sawmill and two planing mills.

Logs are stored, sorted, debarked, squared in a band saw/chipper which produces slabs and chips as byproducts, and finally reduced to dimensional lumber. Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel. Most of the lumber is dried to a pre-determined moisture level in a series of steam-heated drying kilns before being sent to the planing mill for surfacing and final finishing. Wood shavings generated from the planing mill are transferred to a shavings truck bin. Steam for the seven lumber drying kilns is provided by a Zurn Industries hog-fuel boiler.

Most of BLP’s emissions are from the hog-fuel boiler, the seven kilns, and woodworking processes. Emissions from the hog-fueled boiler are controlled by a multiclone in series with a wet scrubber. Some control of particulate emissions from the kilns is provided by venting through humidity control lids, but these emissions are otherwise uncontrolled. Particulate emissions from the woodworking processes (the sawmill and planing mills) are controlled by six cyclones and a baghouse.

Process Flow Diagram

The facility’s process flow diagram, unchanged from the one submitted in the most recent Title V air permit renewal, is on the following page.
1. Proposed Action

The proposed action is a Title V air permit renewal, with no changes in permitted operations or throughput.

2. Applicable Regulatory Requirements

In preparing and submitting this application, Bennett Lumber Products has evaluated the currently applicability of State and Federal regulations.

2.1 Idaho Permit Application Requirements

This application meets IDEQ requirements for a Title V air permit renewal application, as documented by showing in Appendix C where in this application all requirements identified in the IDEQ checklist for this application are met.

2.2 Greenhouse Gas Tailoring Rule

Since the initial Tier I permit was issued, EPA promulgated new regulations related to greenhouse gas emissions. In addition to requirements to monitor and report annual greenhouse gas emissions, EPA established thresholds that determine whether greenhouse gas emissions trigger applicability of the major source status under Title V or EPA's preconstruction permitting program. In both cases, EPA established that greenhouse gas emissions of 100,000 tons or more would make a facility "major" for Title V and for new source review.

Although BLP's wood-fired boiler generates greenhouse gases, those biomass-fueled emissions are considered biogenic and are ignored when evaluating applicability of the PSD or Title V permit programs. Consequently, the BLP facility does not approach the greenhouse gas reporting threshold.

EPA also has established that greenhouse gas monitoring and reporting requirements are not applicable requirements with respect to the Title V air operating permit program.

2.3 Changes to HAP Emission Limits

BLP has updated calculations of potential HAP and VOC emissions from the previous Title V air permit consistent with current EPA Region X and IDEQ guidance. We will continue to track actual HAP emissions to verify that they remain safely below the HAP major source threshold to verify the facility will remain an Area Source of HAP emissions.
Estimates of potential HAP emissions are presented in summary in Section 4 and in detail in Appendix D.

2.5 Regulatory Analysis

IDAPA 58.01.01.314.05 requires that all rules applicable to the facility be listed in the permit application. No new sources are proposed. Therefore, the only change to applicable regulations as documented in the Statement of Basis for the current permit are new regulations or changes to historically applicable regulations.

Appendix E contains the Idaho Federal Regulatory Analysis (Form FRA) with regulatory reviews of applicable federal regulations including New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. The NESHAP regulations implement the Maximum Achievable Control Technology (MACT) standards.

2.5.1 IDAPA 58.01.01 Administrative Rules

With the proposed tracking requirement of actual HAP emissions, the changes proposed in this action do not result in any change in applicability of any IDAPA regulations from those under the current permit, as documented in the current Title V permit Statement of Basis. This review includes a request for Permit Shield. The current Statement of Basis confirms PSD rules do not apply because potential emissions do not reach PSD program emission thresholds. Nothing in this application should change that determination.

2.5.2 NSPS and NESHAP Standards

The Statement of Basis for our current permit, in Sections 7.4 and 7.5, says “The facility is not subject to any of the source categories under 40CFR60 or 40CR61. Nothing in this application should change that determination.

2.5.3 40 CFR 63, Subpart A – General Provisions

The MACT General Provisions apply to all equipment or facilities at the BLP facility that are subject to a MACT subpart. Applicable MACT subparts are described below.

2.5.4 40 CFR 63, Subpart DDDD - PCWP MACT

Title 40 CFR 63, Subpart DDDD contains the MACT standards for plywood and composite wood products (PCWP) sources. This section applies to lumber dry kilns, although there are no applicable requirements for kilns at this time.

2.5.5 40 CFR 63, Subpart JJJJJJ – Boiler MACT

Title 40 CFR 63, Subpart JJJJJJ contains the MACT standards for industrial, commercial, and institutional boilers and process heaters, commonly known as Boiler MACT. This standard applies to the hog fuel boiler and contains extensive applicable requirements. The Boiler MACT
requirements are laid out in detail in the NESHAP Subpart JJJJJ regulatory analysis in Appendix E.

2.5.6 40 CFR 63, Subpart ZZZZ – Engine MACT

NESHAP Subpart ZZZZ, Standards of Performance for Stationary Reciprocating Internal Combustion Engines (Engine MACT), applies to the stationary fire-water pump engine. The fire-water pump is used to pump water to use in fire-fighting. It is tested regularly to ensure that it is ready if needed. A regulatory analysis for NESHAP Subpart ZZZZ is included in Appendix E.

2.5.7 40 CFR 64, Compliance Assurance Monitoring (CAM)

CAM applies to the BLP Zurn boiler that pollutant specific emissions unit meets the applicability requirements set forth in 40CFR 64.2: per 64.2(a) the emission unit is located at a major source that is required to obtain a Title V air permit, per 64.2(a)(1) the unit is subject to an emission limit for particulates, per 64.2(1)(2) the unit uses a control device to achieve compliance, per 64.2(a)(3) the potential pre-control emissions of particulates from the unit are at least 100% of the major source limit, and per 64.2(b) the unit is not otherwise exempt from CAM.

To meet this federal requirement, the facility has an IDEQ approved CAM Plan documented in detailed in Section 7.7 of the current permit’s Statement of Basis. That section and IDEQ form CAM confirm the effectiveness of the facility’s CAM plan in meeting the requirements of the federal 40CFR64 requirement.

3.0 EMISSION UNITS

3.1 Significant Emission Units

Significant emission units and their associated control devices are listed in Table 1. The list is based on Table 2.1 in the facility’s current Title V air permit, with corrections made for some of the boiler data, P21 being a target box rather than a cyclone, and some kiln parameters

Table 3.1: Regulated Sources
<table>
<thead>
<tr>
<th>Source</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hog-Fuel Boiler</td>
<td></td>
</tr>
<tr>
<td>Manufacturer: Zurn Industries</td>
<td></td>
</tr>
<tr>
<td>Steam rated capacity: 60,000 lb/hr</td>
<td></td>
</tr>
<tr>
<td>Fuels: Woodwaste</td>
<td></td>
</tr>
<tr>
<td>Constructed: 1978</td>
<td></td>
</tr>
<tr>
<td>Multiclone</td>
<td></td>
</tr>
<tr>
<td>Manufacturer: Zurn Industries</td>
<td></td>
</tr>
<tr>
<td>Wet Scrubber</td>
<td></td>
</tr>
<tr>
<td>Manufacturer: Zurn Industries</td>
<td></td>
</tr>
<tr>
<td>Woodwoking equipment</td>
<td></td>
</tr>
<tr>
<td>Sawdust Cyclone P7</td>
<td></td>
</tr>
<tr>
<td>Shavings Cyclone P11</td>
<td></td>
</tr>
<tr>
<td>Shavings Cyclone P12</td>
<td></td>
</tr>
<tr>
<td>Shavings Cyclone P13</td>
<td></td>
</tr>
<tr>
<td>Shavings Cyclone P14</td>
<td></td>
</tr>
<tr>
<td>Target Box P21</td>
<td></td>
</tr>
<tr>
<td>Baghouse P24</td>
<td></td>
</tr>
<tr>
<td>Baghouse Cyclone P6</td>
<td></td>
</tr>
</tbody>
</table>

| Emergency Compression Ignition Engine  |
| John Deere model 6081AF001 270HP  | None |

| Lumber Drying Kilns  |
| #1 and 2: Moore 73’ double track installed June 1972 and June 1964  |
| #3: Lumber Systems Inc 73’ single track installed March 1984  |
| #4, 5: Lumber Systems Inc, 73’ double track installed June 1977, June 1977  |
| #6, 7: Wellons 73’ double track installed January 1989 and October 2005  | None |

The Idaho permitting forms for the regulated sources can be found in Appendix A.

### 3.2 Insignificant Emission Units

38 activities and emission units identified as insignificant based upon size or production rate under IDAPA 58.01.01.317.01(b) are listed in Table 9.1 of the current Tier I operating permit to qualify for a permit shield. Appendix B lists the relevant insignificant activities at the facility and a citation of the basis for their identification as insignificant. The list is based on Table 5.5 in T1-2011.0121, the facilities previous Title V air permit.

**Table 3.2: Insignificant Emission Units**

<table>
<thead>
<tr>
<th>Emissions Unit Identification</th>
<th>Description</th>
<th>Insignificant Activities IDAPA 58.01.01.317.01(b) citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>ST1</td>
<td>Truck bark bin</td>
<td>30</td>
</tr>
<tr>
<td>ST2</td>
<td>Truck sawdust bin</td>
<td>30</td>
</tr>
<tr>
<td>ST3</td>
<td>Truck chip bin</td>
<td>30</td>
</tr>
<tr>
<td>ST4</td>
<td>Boiler fuel storage</td>
<td>30</td>
</tr>
<tr>
<td>ST5</td>
<td>Auxiliary fuel bin</td>
<td>30</td>
</tr>
<tr>
<td>Code</td>
<td>Description</td>
<td>Capacity</td>
</tr>
<tr>
<td>------</td>
<td>------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>ST6</td>
<td>Shavings truck bin</td>
<td>30</td>
</tr>
<tr>
<td>ST1</td>
<td>Log yard waste 1</td>
<td>30</td>
</tr>
<tr>
<td>ST5</td>
<td>Rock storage</td>
<td>30</td>
</tr>
<tr>
<td>ST9</td>
<td>Log yard waste 2</td>
<td>30</td>
</tr>
<tr>
<td>ST10</td>
<td>Ash storage</td>
<td>30</td>
</tr>
<tr>
<td>TRI</td>
<td>Hog in feed conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TR2</td>
<td>Bark conveyor system</td>
<td>30</td>
</tr>
<tr>
<td>TR3</td>
<td>Hog out feed conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TR4</td>
<td>Bark screen oversize</td>
<td>30</td>
</tr>
<tr>
<td>TR5</td>
<td>Deck trash conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TR6</td>
<td>Truck bark bin conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TR7</td>
<td>Boiler bark conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TRS</td>
<td>Sawdust conveyor-vibrator</td>
<td>30</td>
</tr>
<tr>
<td>TR9</td>
<td>Chip oversize conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TRI0</td>
<td>Main fuel conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TRI1</td>
<td>Auxiliary fuel bin conveyor</td>
<td>30</td>
</tr>
<tr>
<td>TRI2</td>
<td>Flyash transport</td>
<td>30</td>
</tr>
<tr>
<td>P1</td>
<td>Sawmill</td>
<td>30</td>
</tr>
<tr>
<td>P2</td>
<td>Small log debarker</td>
<td>30</td>
</tr>
<tr>
<td>P3</td>
<td>Large log debarker</td>
<td>30</td>
</tr>
<tr>
<td>P4</td>
<td>Bark hog</td>
<td>30</td>
</tr>
<tr>
<td>P5</td>
<td>Bark screen</td>
<td>30</td>
</tr>
<tr>
<td>P8</td>
<td>Chip screen</td>
<td>30</td>
</tr>
<tr>
<td>P9</td>
<td>Planing mill - new</td>
<td>30</td>
</tr>
<tr>
<td>PI0</td>
<td>Planing mill - old</td>
<td>30</td>
</tr>
<tr>
<td>S1</td>
<td>20,000-gallon diesel fuel tank</td>
<td>30</td>
</tr>
<tr>
<td>S2</td>
<td>20,000-gallon diesel fuel tank</td>
<td>30</td>
</tr>
<tr>
<td>S3</td>
<td>20,000-gallon gasoline tank</td>
<td>30</td>
</tr>
<tr>
<td>S4</td>
<td>2,500-gallon diesel fuel tank</td>
<td>30</td>
</tr>
<tr>
<td>S5</td>
<td>1,000-gallon stove oil tank</td>
<td>30</td>
</tr>
<tr>
<td>S6</td>
<td>30-gallon parts washer</td>
<td>30</td>
</tr>
<tr>
<td>S7</td>
<td>30-gallon parts washer</td>
<td>30</td>
</tr>
<tr>
<td>S8</td>
<td>30-gallon parts washer</td>
<td>30</td>
</tr>
<tr>
<td>S9</td>
<td>2,000-gallon aviation gas storage</td>
<td>30</td>
</tr>
<tr>
<td>S10</td>
<td>1,000-gallon used oil tank</td>
<td>30</td>
</tr>
<tr>
<td>ST6</td>
<td>2,000 cubic yd. Rock storage</td>
<td>30</td>
</tr>
</tbody>
</table>
Section 9 of the current Title V air operating permit explicitly states there are no monitoring, recordkeeping, or reporting requirements for those insignificant activities.

### 4.0 EMISSION INVENTORY SUMMARY

Table 4-1 below summarizes the facility-wide emission inventory, consistent with historic IDEQ air permitting and actual annual emission calculations.

Details of the emission calculations and methodology are documented in Appendix D.

#### Table 4-1 Total Potential Emissions for Bennett Lumber

<table>
<thead>
<tr>
<th>Non-fugitive Emissions</th>
<th>Source</th>
<th>Particulate</th>
<th>PM 10</th>
<th>PM2.5</th>
<th>VOC's</th>
<th>SO2</th>
<th>CO</th>
<th>NOx</th>
<th>CO2 equiv</th>
<th>EPA HAPs</th>
<th>Acetaldehyde</th>
<th>Formaldehyde</th>
<th>Methanol</th>
<th>Propionaldehyde</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
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<td>(tons/yr)</td>
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<td>(tons/yr)</td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
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<td>3.94</td>
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#### Fugitive Emissions

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<th>Source</th>
<th>Particulate</th>
<th>PM 10</th>
<th>PM2.5</th>
<th>VOC's</th>
<th>SO2</th>
<th>CO</th>
<th>NOx</th>
<th>CO2 equiv</th>
<th>EPA HAPs</th>
<th>Acetaldehyde</th>
<th>Formaldehyde</th>
<th>Methanol</th>
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<tr>
<td></td>
<td></td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
<td>(tons/yr)</td>
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<td>(tons/yr)</td>
<td>(tons/yr)</td>
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<tr>
<td>Fugitive - Roads</td>
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<td>1.00</td>
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<td>0.0</td>
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</table>

| PLANTWIDE TOTAL    |              | 128.0       | 121.2 | 114.9 | 137.3 | 8.0 | 249.0| 71.0 | 67483    | 24.49    | 8.9          | 1.7          | 9.49     |                |        |
5.0 FACILITY CLASSIFICATION

The Bennett Lumber Products facility is located in Latah County, which has been designated by the US EPA as “attainment” or “unclassified” for all criteria pollutants. There are no Class I areas within 50 kilometers of the facility, which is located in AQCR 62 and UTM zone 11. For attainment or unclassified areas, a facility would be subject to Prevention of Significant Deterioration (PSD) program requirements if it emitted 100 tons per year or more of a regulated pollutant if the source is classified as one of twenty-eight designated industrial source categories, or 250 tons per year or more of a regulated pollutant from a stationary source. For the Title V Operating Permit program, a source is considered major if potential emissions exceed 100 tons per year. For HAPs, a source is considered major if it emits more than 10 tons per year of an individual HAP or more than 25 tons of HAPs per year cumulatively. From the IDEQ Tier I permit Statement of Basis, the SIC defining the facility is 2421, and the AIRS facility classification is A.

The BLP mill is not a designated facility and will not produce emissions in excess of any of the PSD thresholds. The facility is remains a Title V source with no changes in allowable emissions as a result of the proposed permit renewal. As documented by the tables in Section 4 of this application, the facility’s potential to emit could potentially be sufficiently low (less than 250 tons per year for all criteria air pollutants, and reaching the 100 ton per year Title V program threshold for at least one pollutant for BLP to be considered a Title V major source of air emissions, not reaching PSD program thresholds. The potential emission documentation shows that the facility could possibly reach the HAP major source threshold or HAP major source emission thresholds. BLP tracks actual HAP emissions to document that the HAP major source thresholds will not be reached.
6.0 SCALED PLOT PLAN

Figures 6-1 below shows a scaled plot plan of the facility on a Google Earth aerial photo. Red lines document the property boundaries.

Figure 6-2 provides a scaled plot plan from previous IDEQ approved air quality modeling. That figure uses a conservative estimate of the earlier property boundary. It includes UTM coordinates, and shows modeled facility emission sources and associated buildings.

**Figure 6-1  Facility scaled Plot Plan on Google Earth with property boundary**

**Figure 6-2  Facility scaled Plot Plan with UTM coordinates and emission sources**
7.0 AMBIENT IMPACT ASSESSMENT

No new emission sources nor any changes in potential throughput from any existing emission source are proposed, therefore no ambient air quality modeling is required.

8.0 PROPOSED PERMIT LIMITS

No changes in potential throughputs, nor any new emission sources are proposed, therefore no changes from current permit limits are proposed.
In each box in the table below, CTRL+click on the blue underlined text for instructions and information.

### IDENTIFICATION

<table>
<thead>
<tr>
<th>1. Company Name:</th>
<th>2. Facility Name:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Company, Inc</td>
<td>Bennett Lumber Company, Inc</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>3. Brief Project Description:</th>
<th>Tier 1 air permit renewal</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>All required information is identified in application base Section 2.5 and reviewed in detail in Appendix E</td>
</tr>
</tbody>
</table>

### APPLICABILITY DETERMINATION

4. List all applicable subparts of the New Source Performance Standards (NSPS) (40 CFR part 60).

   List all non-applicable subparts of the NSPS which may appear to apply to the facility but do not.

   Examples of NSPS-affected emissions units include internal combustion engines, boilers, turbines, etc. Applicant must thoroughly review the list of affected emissions units.

   List of all applicable subpart(s):

   List of all non-applicable subpart(s) which may appear to apply but do not:

   - [ ] Not Applicable

5. List applicable subpart(s) of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR part 61 and 40 CFR part 63).

   List all non-applicable subparts of the NESHAP which may appear to apply to the facility but do not.

   Examples of affected emission units include solvent cleaning operations, industrial cooling towers, paint stripping and miscellaneous surface coating. Reference EPA's webpage on NESHAPs for more information.

   List of all applicable subpart(s):

   List of all non-applicable subpart(s) which may appear to apply but do not:

   - [ ] Not Applicable

   - ✔ A detailed regulatory review has been provided

   - [ ] DEQ has already been provided a detailed regulatory review (please provide a reference)

Note: Regulatory reviews must be submitted with sufficient detail so that DEQ can verify applicability and document in legal terms why the regulation does or does not apply. Regulatory reviews submitted with insufficient detail will be determined incomplete.
IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT.

It is emphasized that it is the applicant’s responsibility to satisfy all technical and regulatory requirements, and that DEQ will help the applicant understand those requirements prior to submittal of the application but that DEQ will not perform the required technical or regulatory analyses on the applicant’s behalf.
Instructions for Form FRA

1 – 3. Provide the company name, facility name (if different), and a brief project description.

Applicability Determination

4 - 5. It is important that facilities review the most recent federal regulations when submitting their permit application to DEQ. Current federal regulations can be found at the following website: https://www.ecfr.gov.

6. For each applicable subpart identified under items 4-5, conduct a complete regulatory analysis. The facility must follow the procedure given below or obtain permission from DEQ to provide the necessary information using an alternative procedure:

   a. Retrieve a TEXT or PDF copy of the applicable federal regulation subpart(s) online at https://www.govinfo.gov or from https://www.ecfr.gov for the next step.

   b. Copy and paste the regulation(s) into the DEQ air permit application.

   c. Highlight or underline sections in the regulation(s) that are applicable to the source(s).

   d. Under each section of the subpart, explain why the source is or is not subject to the section in addition to how the source will comply with the section. When providing the explanation use a different font than the regulation (i.e. *italics*) so that it is easy for the reader to determine the text provided by the applicant. An example NSPS regulatory analysis follows. The applicant must provide all information needed to determine applicability. If information is lacking or the analysis is incomplete, the application will be determined incomplete.

   e. Information on NSPS/NESHAP applicability determinations that may be useful to applicants is available on EPA’s website under Clean Air Act Applicability Determination Index. Another useful source of information is the preamble to the regulation which is published in the Federal Register on the date the regulation was promulgated. Federal Registers may be found online at https://www.federalregister.gov. The date the regulation was published in the Federal Register is included in the footnotes of the regulation.

   DEQ will assist in identifying the applicable requirements that the applicant must include in the application, but will not perform the required technical or regulatory analysis on the applicant’s behalf. Applicants should contact the Air Quality Permit Hotline (1-877-573-7648) to discuss NSPS/NESHAP regulatory analysis requirements or to schedule a meeting.

   f. Facilities should also document a non-applicability determination on federal air regulations which may appear to apply to the facility but actually do not. A non-applicability determination will avoid future confusion and expedite the air permit application review. If you conduct an applicability determination and find that your activity is not NSPS or NESHAP affected facility, an analysis should be submitted using the methods described above.

   g. It is not sufficient to simply provide a copy of the NSPS or NESHAP. The applicant must address each section of the regulation as described above and as shown in the example that follows.
Example of a NSPS Regulatory Analysis

Because the facility has a compression ignition IC engine the following NSPS requirements apply to this facility:

- **40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.**

The applicable parts are highlighted in yellow.

40 CFR 60  Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§ 60.4200  Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:

   (i) 2007 or later, for engines that are not fire pump engines;

   (ii) The model year listed in Table 3 to this subpart or later model year, for fire pump engines.

(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are:

   (i) Manufactured after April 1, 2006, and are not fire pump engines, or

   (ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

(3) Owners and operators of any stationary CI ICE that are modified or reconstructed after July 11, 2005 and any person that modifies or reconstructs any stationary CI ICE after July 11, 2005.

(4) The provisions of §60.4208 of this subpart are applicable to all owners and operators of stationary CI ICE that commence construction after July 11, 2005.

The ACME Plant operates two CI engines that were manufactured and commenced operation in 2007 and has proposed five new CI engines that are manufactured after April 1, 2006 and will commence operation in 2017. Therefore this section is applicable.

(b) The provisions of this subpart are not applicable to stationary CI ICE being tested at a stationary CI ICE test cell/stand.

(c) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

The ACME Plant is an area source of criteria pollutants and HAPs and therefore is exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71.

(d) Stationary CI ICE may be eligible for exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C (or the exemptions described in 40 CFR part 89, subpart J and 40 CFR part 94, subpart J, for engines that would need to be certified to standards in those parts), except that owners and operators, as well as manufacturers, may be eligible to request an exemption for national security.
(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

§ 60.4201 What emission standards must I meet for non-emergency engines if I am a stationary CI internal combustion engine manufacturer?

The ACME Plant is not a stationary CI internal combustion engine manufacturer. Therefore, this section does not apply.

§ 60.4202 What emission standards must I meet for emergency engines if I am a stationary CI internal combustion engine manufacturer?

(a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (a)(1) through (2) of this section.

(1) For engines with a maximum engine power less than 37 KW (50 HP):

   (i) The certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants for model year 2007 engines, and


(2) For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants beginning in model year 2007.

The engines operated by the ACME Plant have a maximum engine power of 450 bhp that have a displacement of less than 10 liters per cylinder and are not fire pump engines and are therefore required to meet the certification emission standards in 40 CFR 89.112 and 89.113.

And so forth......
Complete this form for each baghouse. Please see instructions on page 2 before filling out the form.

### IDENTIFICATION

<table>
<thead>
<tr>
<th>1. Company Name</th>
<th>2. Facility Name:</th>
</tr>
</thead>
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<tr>
<td>Bennett Lumber Company, Inc</td>
<td>Bennett Lumber Company, Inc</td>
</tr>
</tbody>
</table>

| 3. Brief Project Description: | Tier 1 air permit renewal |

### BAGHOUSE INFORMATION

|--------------------------|-------------------|-----------------------------|

7 (a). Baghouse particulate matter emission concentration. ____. gr/dscf

*Note: Provide information in 7(a)-(c) or answer question #8 below.*

Manufacturers typically provide guarantees in grains per dry standard cubic foot (gr/dscf). Provide a copy of the guarantee, or other documentation, with the application along with a description of the types of bags that must be used to achieve the emission concentration. Emission concentrations less than 0.01 gr/dscf will receive additional scrutiny by DEQ and a source test of the baghouse may be required. If a guarantee is not provided then you must document how you obtained the emission concentration. Without documentation the application is not complete.

7 (b). Percentage PM\(_{10}\) ____. %

Or Provide PM\(_{10}\) Emission Concentration ____. gr/dscf

What percentage of the PM concentration listed in question #7(a) is PM\(_{10}\)? You must provide documentation as to how the percentage was determined (i.e. per the baghouse manufacturer). Without documentation the application is not complete.

7 (c). Baghouse flow rate ____. dscfm

Provide the baghouse flow rate in dry standard cubic feet per minute. Actual cubic feet per minute may be given in lieu of dscfm if it is documented that moisture content is insignificant. You must provide documentation as to how this flow rate was determined (i.e. per the exhaust fan manufacturer, combustion evaluation, etc.). Without documentation the application is not complete.

8. Baghouse particulate matter control efficiency. ____. % PM control

*Note: Not needed if section #7 is completed.*

Applicant’s providing the control efficiency of the baghouse must provide control efficiency for both PM and PM\(_{10}\). Provide a copy of the control efficiency documentation with the application. Documentation must include a description of the types of bags that must be used to achieve the control efficiency. Without documentation the application is not complete.

9. Is the baghouse equipped with a bag leak detector? Yes [ ] No [ ]

If a bag leak detector is installed provide documentation on the leak detector, including; how the leak detector functions and what level of the output signal indicates that a bag is leaking. Without documentation the application is not complete.
Instructions for Form BCE

1 – 3. Provide the same company name, facility name, and brief project description as on the application cover sheet Form CS**. This is useful if application pages are separated.

USE ATTACHMENT IF ADDITIONAL SPACE IS REQUIRED.

**Baghouse Information:**

4-5. Provide the baghouse manufacturer name and the model number.

6. Provide an identification number for the baghouse stack. This number is assigned by the applicant and must be provided on any other application materials which are submitted that include baghouse information.

7-9. Follow the instructions in the form. All documentation provided must be sufficient so that DEQ can verify the validity of the information provided. Provide the Baghouse Equipment ID number on all submitted documentation. If documentation is not provided the application is incomplete.
Please see instructions on page 2 before filling out the form.

### IDENTIFICATION

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<thead>
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<th>1. Company Name</th>
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<table>
<thead>
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### EQUIPMENT DESCRIPTION

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<th>7. Model:</th>
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<td>[ ] Venturi</td>
</tr>
<tr>
<td>-</td>
<td>[ ] Tray/Plate</td>
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9. [ ] Dry Scrubber

10. [ ] Other (please provide details):

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<th>11. Type of Packing Material:</th>
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12. Pressure Drop Across Throat: ________ in w.g.

13. Pressure in Spray Nozzles: ________ in psi

14. Operating Pressure Range (all scrubber types): 0.5 ________ to 7.5 ________ in w.g.

15. Other Operating Parameters (if necessary):

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<th>Scrubbing Media (as required)</th>
<th>16. Recirculation Rate: ________ &gt;350 ________ gpm</th>
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<td>-</td>
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17. Flow Meter? [ ] Yes [ ] No

18. pH of Scrubbing Media (range): ________ to ________

19. pH Meter? [ ] Yes [ ] No

20. ORP of Scrubbing Media (range): ________ to ________ mv

21. ORP Meter? [ ] Yes [ ] No

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23. [ ] VOC

24. [ ] SO\(_2\)

25. [ ] H\(_2\)S

26. [ ] Odor

27. [ ] Inorganic Fumes

28. Other: ________

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<td>30. Particulates (PM(_{2.5}))</td>
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<tr>
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<td>35. Inorganic Fume</td>
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<td>36. Other</td>
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</tr>
</tbody>
</table>

29. Particulates (PM\(_{10}\))

30. Particulates (PM\(_{2.5}\))

31. VOC

32. SO\(_2\)

33. H\(_2\)S

34. Odor

35. Inorganic Fume

36. Other

Note: Supporting documentation must be provided. “Supporting documentation must be provided” in this section means the following information shall be available for DEQ staff review:

- Control equipment manufacturer guarantees (if applicable),
- Source test reports (if applicable)
- All sources of emissions factors used to perform emissions calculations (i.e. continuous emissions monitoring system (CEMS) data, source testing, and/or US EPA’s AP-42), and
- All assumptions used to perform emissions calculations.
Instructions for Form SCE

1 – 5. Provide the company name, facility name (if different), the ID number of the unit being controlled by the scrubber, the exhaust stack ID of the scrubber, and a brief project description.

**USE ATTACHMENTS IF ADDITIONAL SPACE IS REQUIRED.**

**Equipment:**
6 – 7. Identify the manufacturer and model of the scrubber proposed to be installed.

**Scrubber Type:**
8 - 10. Identify the type of scrubber proposed to be installed.

**Components:**
11. Identify the type of packing material to be used in the proposed packed bed scrubber (if applicable).
12. Specify the pressure drop across the throat of the proposed wet scrubber (if applicable).
13. Specify the operating pressure of the nozzles in the proposed spray chamber scrubber (if applicable).
14. Identify the operating pressure range of the scrubber (applicable to all types).
15. Identify any other operating parameters of the scrubber (if necessary).

**Scrubbing Media:**
16. Specify the recirculation rate of the scrubber media (if applicable).
17. Specify whether a flow meter is present (if applicable).
18. Specify the pH operating range of the scrubbing media (if applicable).
19. Specify whether a pH meter is present (if applicable).
20. Specify the ORP (Oxidation-Reduction Potential) operating range of the scrubbing media (if applicable).
21. Specify whether an ORP meter is present (if applicable).

**Pollutant (being removed):**
22 - 28. Identify the pollutant being removed by the proposed scrubber.

**Emissions Data:**
29 - 36. Identify the control efficiency for the appropriate pollutant of the scrubber proposed to be installed.
37 - 40. Specify the source (or sources) of the control efficiency.

“Supporting documentation must be provided” in this section means the following information shall be available for DEQ staff review:

- Control equipment manufacturer guarantees (if applicable),
- Source test reports (if applicable)
- All sources of emissions factors used to perform emissions calculations (i.e. continuous emissions monitoring system (CEMS) data, source testing, and/or US EPA’s AP-42), and
- All assumptions used to perform emissions calculations.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

1. Company Name
   - Bennett Lumber Products, Inc.
2. Facility Name
   - BLP Princeton
3. Brief Project Description
   - Tier 1 AQ Operating Permit Renewal: same data as previously submitted

### BOILER/PROCESS HEATER UNIT SPECIFICATIONS

4. Type of unit: ☒ Boiler  ☐ Water Heater  ☐ Process Heater; process material(s) ____________________________
5. Emissions unit history:  ☐ New unit  ☐ Unpermitted existing unit  ☐ Modification to an existing permitted unit? Permit number: ___________ Tier II/PTC No. T2-010208
12. Control Device (if any)  Multi-clone and scrubber (Baghouse, ESP, or Scrubber)  Note: Attach applicable control equipment FORM BCE, ESP, or SCE
13. Fuel Meter Used:  ☐ Gaseous  ☐ Liquid  ☐ None
14. Heater Exhaust Stack Parameters:
   - Diameter: 43.2 inches  Height: 50 feet  Temperature: 231°F  Flow rate: 556.8acfs  acfm
   - Exhaust Orientation: ☒ Vertical (unobstructed upward)  ☐ Vertical (obstructed upward)  ☐ Horizontal  ☐ Other ____________
15. Primary Burner: Manufacturer:  Zurn  Model:  Hog Fuel Boiler  Max Heat Input Rating:  ___________ MMBtu/hr
16. Secondary Burner (if applicable): Manufacturer:  Zurn  Model:  Hog Fuel Boiler  Max Heat Input Rating:  60,000 lbs steam/hr MMBtu/hr
17. Are any of the burners of low NOx design?  ☐ Yes  ☐ No
18. For Process Heaters, will there be emissions from process materials?  ☐ No  ☐ Yes, included separately  ☐ Yes, included in the emission factors below (#23)

### FUEL SPECIFICATION AND UNIT EMISSION FACTORS

19. Primary Fuel Type:  ☐ Natural Gas  ☐ Diesel Fuel (#   )  ☐ LPG/Propane  ☒ Other Fuel:  wood
20. Secondary Fuel Type (if applicable):  ☐ Natural Gas  ☐ Diesel Fuel (#   )  ☐ LPG/Propane  ☐ Other Fuel:

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>Primary Fuel</th>
<th>Secondary Fuel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Heat Value (Btu/unit, LHV)</td>
<td>17.59 MMBtu/BDT</td>
<td></td>
</tr>
<tr>
<td>Sulfur Content (ppmv, wt%)</td>
<td>0.025lbs SOx/MMBtu</td>
<td></td>
</tr>
<tr>
<td>Are Rated or Source Test Emission Factors available for this unit? (list below)</td>
<td>☒ Yes  ☐ No</td>
<td></td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>0.168</td>
<td></td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>27 lbs/hr</td>
<td></td>
</tr>
<tr>
<td>NO$_x$</td>
<td>0.22</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>0.60</td>
<td></td>
</tr>
<tr>
<td>SO$_2$</td>
<td>0.025</td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>0.038</td>
<td></td>
</tr>
</tbody>
</table>

**Note:** Include supporting documentation.

Source testing or manufacturer’s data is preferred; when available.

24. Other Pollutant(s):
25. Duration Operational Mode:
   - N/A  24 hr/day  _______ hr/day  N/A  _______ hr/day  _______ hr/day
   - 8760 hr/yr  _______ hr/yr  _______ hr/yr  _______ hr/yr

### OPERATING LIMITS & SCHEDULE

26. Proposed Unit Operating Limits and Process Material Limits: (hr/day, hr/yr, gal/yr, MMscf/yr, etc) **Note:** These limits will be placed in the permit: 

Page 1
<table>
<thead>
<tr>
<th></th>
<th>NSPS or MACT Applicability: Yes ☒ No ☐</th>
<th>If “yes”, which subpart applies?: JJJJJ</th>
<th><strong>Note:</strong> Form FRA must be completed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>27.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Instructions for Form EU5

Please refer to IDAPA 58.01.01.220 for a list of the general exemption criteria for Permit to Construct exemptions.

1 – 3. Provide the same company name, facility name (if different), and brief project description as on Form GI. This is useful if the application pages are separated.

USE ATTACHMENT IF ADDITIONAL SPACE IS REQUIRED.

Unit Specifications:

4. Indicate whether the unit is a boiler, water heater, or process heater. Boilers combust fuel to produce steam; water heaters combust fuel solely to heat water; and process heaters heat raw or intermediate process materials (including heat transfer materials). A dryer may be a process heater, such as a milk dryer or potato dryer. For Process Heaters, the material(s) heated should be noted and emissions estimates provided resulting from the heating of and/or reaction of the materials. In each of these types of units, the combustion gases do not directly come into contact with the process materials.

5. Indicate whether a new unit, unpermitted existing unit, or a modified permitted unit.

6 - 8. Provide the unit manufacturer, model, and date the unit was manufactured.

9. Provide the date of installation of the unit if the unit is already existing.

10. Provide the serial number of the unit.

11. Provide the identification (ID) number of the unit (if a specific number is used for identification in emissions inventory or modeling analysis).

12. List any add-on emissions control equipment used with the unit. Idaho DEQ Form BCE and SCE are to be completed in addition to provide additional information if a baghouse or scrubber is used.

13. Indicate if a fuel meter for the unit is used, and if so, what type.

14. Provide the unit exhaust stack parameters. The temperature and flow rate should be per the unit manufacturer. If the stack height is very tall, provide a justification for the exhaust gas temperature.

15. Provide the manufacturer, model and heat input rating for the primary burner of the unit. Heat input rating should be per manufacturer.

16. If the unit has a secondary burner unit, provide the manufacturer, model and heat input rating for the secondary burner. Heat input rating should be per manufacturer.

17. Are any of the primary or secondary burners of low NOx design? Low NOx burners typically have reduced oxides of nitrogen (NOx) emissions and also have increased carbon monoxide (CO) emissions when compared to other designs.

18. For Process Heaters, are any emissions expected from the heating, combination, or reaction of process materials? Any potential emissions of criteria pollutants (including particulate matter and volatile organic compounds), toxic air pollutants (TAP), and hazardous air pollutants (HAP) should be considered (e.g., #23 and #24).

Fuel Specifications and Emission Factors:

19. Indicate which type of primary fuel is combusted by the unit.

20. If a secondary, back-up, or emergency fuel is combusted by the unit, indicate which type.

21. Provide the Fuel Heating Value for fuels combusted by unit (if different from industry standard, include supporting documentation).

22. Provide the sulfur content by percent weight for fuels combusted by the unit.

23. This section is to provide emission factor information that is unit specific and different from generic EPA unit combustion data (i.e. AP-42). Emission estimates should be based on the most representative data available. When available, source test or other unit-specific emissions data should be listed. If representative source-specific data cannot be obtained, emissions information from the manufacturer or equipment vendors, particularly emission performance guarantees or actual test data from similar equipment is preferred. Include supporting documentation; source testing may be required for validation. Note: Start up and shut down emission factor information may not be available.
24. List any additional pollutant(s) and associated emission factors not listed under question 20 if unit-specific info is to be used. Include supporting documentation as necessary. **Note:** Start up and shut down emission factor information may not be available.

25. List the anticipated time of start up and shut down associated with the unit. If start up and shut down emission factors are not available please list “NA”. **Note:** These anticipated start up and shut down times may be placed in the permit.

**Operating Limits & Schedule:**

26. Propose a maximum daily and maximum annual unit hourly limit for all applicable fuels. For Process Heaters, also propose a maximum daily and maximum annual material input, throughput, or output rate. **Note:** Unless it is 24 hours per day and 8,760 hours per year of operation, proposed daily limits will be placed in the permit.

**Federal Rules Applicability:**

27. Indicate if an NSPS or MACT (40 CFR 60 and 40 CFR 63, respectively) subpart is applicable to the unit. If yes, Idaho DEQ Form FRA must be complete to determine the specific applicability of appropriate NSPS or MACT subpart.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

<table>
<thead>
<tr>
<th>1. Company Name:</th>
<th>Bennett Lumber Products, Inc</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Facility Name:</td>
<td>Bennett Lumber Products, Inc</td>
</tr>
<tr>
<td>3. Facility ID No.:</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

4. Brief Project Description:
   - P-6 Baghouse sawdust cyclone at boiler. Tier 1 AQ Operating Permit renewal: Approved by IDEQ for for last relevant PTC application and Tier 1 renewal

### CYCLONE SEPARATOR INFORMATION

**Equipment Description**

- **Manufacturer:** Western Pneumatics
- **Model Number:** 3' High Efficiency

**Dimensions**

1. B: __ in.
2. H: __ in.
4. L: __ in.
5. Z: __ in.
6. D: __ in.
7. A: __ in.

**Micron range**

<table>
<thead>
<tr>
<th>Micron range</th>
<th>Particle size distribution weight %</th>
<th>Manufacturer's guaranteed removal efficiency for each micron range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5-1.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.0-5.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-10</td>
<td>Smaller material (sawdust from sawmill)</td>
<td></td>
</tr>
<tr>
<td>10-20</td>
<td>Used IDEQs for wood products ind EF as documented in EI</td>
<td></td>
</tr>
<tr>
<td>Over 20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Type of Cyclone**

- ☑ Wet
- ☑ Dry

**Type of Cyclone Unit**

- ☑ Single
- ☐ Quadruple
- ☐ Dual
- ☐ Multiclone

**Blower**

- Blower horsepower: __ hp
- Design flow rate: __ scfm
- Draft: ☑ Forced
- ☐ Induced

**Design Criteria**

- ☑ Positive pressure
- ☐ Negative pressure

13. Pre-Treatment Device

- ☑ Cyclone
- ☜ Knock-out chamber
- ☐ Precooler
- ☐ None
- ☐ Preheater

14. Post-Treatment Device

- ☑ Baghouse/Cartridge
- ☐ HEPA
- ☐ Other:
<table>
<thead>
<tr>
<th>Process Stream Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>15. Brief Description of Process</strong></td>
</tr>
<tr>
<td>.</td>
</tr>
<tr>
<td><strong>16. Flow Data</strong></td>
</tr>
<tr>
<td>Gas stream temperature: AMBIENT degrees F</td>
</tr>
<tr>
<td>Moisture content: WOOD PRODUCTS HAVE 47% MOISTURE CONTENT grams of water/cubic feet ((\text{ft}^3)) of dry air</td>
</tr>
<tr>
<td>Pressure drop range</td>
</tr>
<tr>
<td>High: UNKNOWN in. H(_2)O  Low: in. H(_2)O</td>
</tr>
<tr>
<td>Dew point temperature of process stream: degrees F</td>
</tr>
<tr>
<td>Inlet flow rate: 2005 ACFM</td>
</tr>
<tr>
<td><strong>17. Dust Collection Device</strong></td>
</tr>
</tbody>
</table>
| ☑ Pneumatic conveyor  ☐ Rotary airlock values  ☐ Screw conveyors  ☐ Closed container  
☑ Double dump  ☐ Drag conveyor  
☑ Manual discharge device: ☐ Slide gate OR ☐ Hinged doors or drawers |
| **18. Operating Schedule** |
| Normal: 12 hours/day  5 days/week  50 weeks/year |
| Maximum: 16 hours/day  17 days/week  52 weeks/year |
Instructions for Form CYS

For cyclone separators only, this form may be used *in place of* Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

**Equipment Description**

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

**Process Stream Characteristics**

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

<table>
<thead>
<tr>
<th>1. Company Name:</th>
<th>Bennett Lumber Products, Inc</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Facility Name:</td>
<td>Bennett Lumber Products, Inc</td>
</tr>
<tr>
<td>3. Facility ID No.:</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

4. Brief Project Description: P-7 Sawdust cyclone atop boiler building. Tier 1 AQ Operating Permit renewal: Approved by IDEQ for last relevant PTC application and Tier 1 renewal

### CYCLONE SEPARATOR INFORMATION

#### Equipment Description

<table>
<thead>
<tr>
<th>5. Manufacturer:</th>
<th>Western Pneumatics</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Model Number:</td>
<td>3’ High Efficiency</td>
</tr>
</tbody>
</table>

#### Particulate Size Distribution Data

<table>
<thead>
<tr>
<th>Micron range</th>
<th>Particle size distribution weight %</th>
<th>Manufacturer's guaranteed removal efficiency for each micron range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5-1.0</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>5-10</td>
<td>smaller material</td>
<td></td>
</tr>
<tr>
<td>10-20</td>
<td>used IDEQs for wood products and EF as documented in EI</td>
<td></td>
</tr>
<tr>
<td>Over 20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>9. Type of Cyclone</th>
<th>Wet</th>
<th>Dry</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>10. Type of Cyclone Unit</th>
<th>Single</th>
<th>Quadruple</th>
<th>Dual</th>
<th>Multiclone</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>11. Blower</th>
<th>Blower horsepower:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>hp</td>
</tr>
</tbody>
</table>

| Design flow rate: | scfm |
|                  |      |

<table>
<thead>
<tr>
<th>12. Design Criteria</th>
<th>Cyclone configuration:</th>
<th>Positive pressure</th>
<th>Negative pressure</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>13. Pre-Treatment Device</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Cyclone</td>
<td></td>
</tr>
<tr>
<td>Knock-out chamber</td>
<td></td>
</tr>
<tr>
<td>Precooler</td>
<td>×</td>
</tr>
<tr>
<td>Preheater</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>14. Post-Treatment Device</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Baghouse/Cartridge</td>
<td></td>
</tr>
<tr>
<td>HEPA</td>
<td></td>
</tr>
<tr>
<td>Other:</td>
<td></td>
</tr>
<tr>
<td>Process Stream Characteristics</td>
<td></td>
</tr>
<tr>
<td>--------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>15. Brief Description of Process</strong></td>
<td></td>
</tr>
<tr>
<td>.</td>
<td></td>
</tr>
<tr>
<td><strong>16. Flow Data</strong></td>
<td></td>
</tr>
<tr>
<td>Gas stream temperature: AMBIENT degrees F</td>
<td></td>
</tr>
<tr>
<td>Moisture content: WOOD PRODUCTS HAVE 47% MOISTURE CONTENT grams of water/cubic feet (ft³) of dry air</td>
<td></td>
</tr>
<tr>
<td>Pressure drop range</td>
<td></td>
</tr>
<tr>
<td>High: UNKNOWN in. H₂O  Low: in. H₂O</td>
<td></td>
</tr>
<tr>
<td>Dew point temperature of process stream: degrees F</td>
<td></td>
</tr>
<tr>
<td>Inlet flow rate: 2005 ACFM</td>
<td></td>
</tr>
<tr>
<td><strong>17. Dust Collection Device</strong></td>
<td></td>
</tr>
<tr>
<td>☑ Pneumatic conveyor  ☐ Rotary airlock values  ☐ Screw conveyors  ☐ Closed container</td>
<td></td>
</tr>
<tr>
<td>☐ Double dump  ☐ Drag conveyor</td>
<td></td>
</tr>
<tr>
<td>☐ Manual discharge device: Slide gate OR Hinged doors or drawers</td>
<td></td>
</tr>
<tr>
<td><strong>18. Operating Schedule</strong></td>
<td></td>
</tr>
<tr>
<td>Normal: 12 hours/day  5 days/week  50 weeks/year</td>
<td></td>
</tr>
<tr>
<td>Maximum: 16 hours/day  17 days/week  52 weeks/year</td>
<td></td>
</tr>
</tbody>
</table>
Instructions for Form CYS

For cyclone separators only, this form may be used *in place of* Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

**Equipment Description**

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

**Process Stream Characteristics**

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

| 1. Company Name: | Bennett Lumber Products, Inc |
| 2. Facility Name: | Bennett Lumber Products, Inc |
| 3. Facility ID No.: | 057-00008 |

4. Brief Project Description:
P-11 SHAVINGS CYCLONE AT THE NEW PLANER FROM THE OLD PLANER. Tier 1 AQ Operating Permit renewal submitted and approved by IDEQ for last relevant PTC application and Tier 1 renewal.

### CYCLONE SEPARATOR INFORMATION

#### Equipment Description

| 5. Manufacturer: | Western Pneumatics |
| 6. Model Number: | Unknown manufacturer, 7' cyclone on old planer, installed 1970s or earlier |

#### Particulate Size Distribution Data

<table>
<thead>
<tr>
<th>Micron range</th>
<th>Particle size distribution weight %</th>
<th>Manufacturer's guaranteed removal efficiency for each micron range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5-1.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.0-5.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-10</td>
<td>LARGER</td>
<td></td>
</tr>
<tr>
<td>10-20</td>
<td>planer shavings</td>
<td></td>
</tr>
<tr>
<td>Over 20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

9. Type of Cyclone

- ☑ Wet
- ☑ Dry

10. Type of Cyclone Unit

- ☑ Single
- ☑ Quadruple
- ☑ Dual
- ☑ Multiclone

11. Blower

- Blower horsepower: hp
- Design flow rate: scfm
- Draft: ☑ Forced
- ☑ Induced

12. Design Criteria

- Cyclone configuration: ☑ Positive pressure
- ☑ Negative pressure

13. Pre-Treatment Device

- ☑ Cyclone
- ☑ Knock-out chamber
- ☑ Precooler
- ☑ None
- ☑ Preheater

14. Post-Treatment Device

- ☑ Baghouse/Cartridge
- ☑ HEPA
- ☑ Other:
<table>
<thead>
<tr>
<th>Process Stream Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>15. Brief Description of Process</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>16. Flow Data</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas stream temperature: AMBIENT degrees F</td>
</tr>
<tr>
<td>Moisture content: 19% MOI CONTENT POST-KILN PLANER SHAVINGS grams of water/cubic feet (ft³) of dry air</td>
</tr>
<tr>
<td>Pressure drop range</td>
</tr>
<tr>
<td>High: UNKNOWN in. H₂O</td>
</tr>
<tr>
<td>Dew point temperature of process stream: degrees F</td>
</tr>
<tr>
<td>Inlet flow rate: 34605.45 ACFM</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>17. Dust Collection Device</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>☑ Pneumatic conveyor</td>
</tr>
<tr>
<td>☐ Double dump</td>
</tr>
<tr>
<td>☐ Manual discharge device:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>18. Operating Schedule</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Normal: 2 hours/day</td>
</tr>
<tr>
<td>Maximum: 6 hours/day</td>
</tr>
</tbody>
</table>
Instructions for Form CYS

For cyclone separators only, this form may be used in place of Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

Equipment Description

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

Process Stream Characteristics

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

1. **Company Name:** Bennett Lumber Products, Inc
2. **Facility Name:** Bennett Lumber Products, Inc
3. **Facility ID No.:** 057-00008

4. **Brief Project Description:** P-12 SHAVINGS CYC, NEW PLANER, with baghouse P-24 control. Tier 1 AQ Operating Permit renewal: submitted and approved by IDEQ for last relevant PTC application and Tier 1 renewal

### CYCLONE SEPARATOR INFORMATION

#### Equipment Description

<table>
<thead>
<tr>
<th>Manufacturer: Western Pneumatics</th>
<th>Model Number: Aloha Metal Fabrication, 13.5’ cyclone for new planer, in place for &gt;10 years</th>
</tr>
</thead>
</table>

#### Dimensions

Give dimensions of cyclone. (See sample diagram above.)

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Micron range

<table>
<thead>
<tr>
<th>Micron range</th>
<th>Particle size distribution weight %</th>
<th>Manufacturer's guaranteed removal efficiency for each micron range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5-1.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.0-5.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-10</td>
<td></td>
<td>Large material (planer shavings)</td>
</tr>
<tr>
<td>10-20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Over 20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

9. **Type of Cyclone**
- [ ] Wet
- [x] Dry

10. **Type of Cyclone Unit**
- [x] Single
- [ ] Quadruple
- [ ] Dual
- [ ] Multiclone

11. **Blower**
- **Blower horsepower:** [ ] hp
- **Design flow rate:** [ ] scfm
- **Draft:**
  - [ ] Forced
  - [ ] Induced

### Design Criteria

- [ ] Positive pressure
- [x] Negative pressure

#### Pre-Treatment Device
- [ ] Cyclone
- [ ] Knock-out chamber
- [ ] Precooler
- [x] None
- [ ] Preheater

#### Post-Treatment Device
- [ ] Baghouse/Cartridge
- [ ] HEPA
- [ ] Other:
### Process Stream Characteristics

<table>
<thead>
<tr>
<th>15. Brief Description of Process</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>16. Flow Data</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas stream temperature: AMBIENT degrees F</td>
<td></td>
</tr>
<tr>
<td>Moisture content: 19% MOI CONTENT POST-KILN PLANER SHAVINGS grams of water/cubic feet (ft³) of dry air</td>
<td></td>
</tr>
<tr>
<td>Pressure drop range</td>
<td></td>
</tr>
<tr>
<td>High: UNKNOWN in. H₂O</td>
<td>Low: in. H₂O</td>
</tr>
<tr>
<td>Dew point temperature of process stream: degrees F</td>
<td></td>
</tr>
<tr>
<td>Inlet flow rate: 13030 ACFM</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>17. Dust Collection Device</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>✔ Pneumatic conveyor</td>
<td>□ Rotary airlock values</td>
</tr>
<tr>
<td>□ Double dump</td>
<td>□ Drag conveyor</td>
</tr>
<tr>
<td>□ Manual discharge device: □ Slide gate OR □ Hinged doors or drawers</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>18. Operating Schedule</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Normal: 10 hours/day 6 days/week 50 weeks/year</td>
<td></td>
</tr>
<tr>
<td>Maximum: 13.5 hours/day 7 days/week 50 weeks/year</td>
<td></td>
</tr>
</tbody>
</table>
Instructions for Form CYS

For cyclone separators only, this form may be used in place of Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

Equipment Description

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

Process Stream Characteristics

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Company Name:</td>
<td>Bennett Lumber Products, Inc</td>
<td>2. Facility Name:</td>
</tr>
<tr>
<td>4. Brief Project Description:</td>
<td>P-13 SHAVINGS CYC ON TOP OF SHAVINGS BIN. Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for last relevant PTC application and Tier 1 renewal</td>
<td></td>
</tr>
</tbody>
</table>

### CYCLONE SEPARATOR INFORMATION

#### Equipment Description

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Manufacturer:</td>
<td>Western Pneumatics</td>
</tr>
<tr>
<td>6. Model Number:</td>
<td>Unknown manufacturer, 7’ cyclone atop shavings truck bin, installed by 1970s</td>
</tr>
</tbody>
</table>

#### Micron range

<table>
<thead>
<tr>
<th>Micron range</th>
<th>Particle size distribution weight %</th>
<th>Manufacturer's guaranteed removal efficiency for each micron range</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.5-1.0</td>
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</tr>
<tr>
<td>1.0-5.0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-10</td>
<td>Larger material (planer shavings)</td>
<td></td>
</tr>
<tr>
<td>10-20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Over 20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Type of Cyclone

<table>
<thead>
<tr>
<th>Type of Cyclone Unit</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Single</td>
<td>☒</td>
</tr>
<tr>
<td>Quadruple</td>
<td></td>
</tr>
<tr>
<td>Dual</td>
<td></td>
</tr>
<tr>
<td>Multiclone</td>
<td></td>
</tr>
</tbody>
</table>

#### Blower

<table>
<thead>
<tr>
<th>Blower horsepower:</th>
<th>Design flow rate:</th>
<th>Draft:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>scfm</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Forced</td>
</tr>
</tbody>
</table>

#### Design Criteria

<table>
<thead>
<tr>
<th>Cyclone configuration:</th>
<th>Positive pressure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pre-Treatment Device:</th>
<th>Baghouse/Cartridge</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cyclone</td>
<td></td>
</tr>
<tr>
<td>Precooler</td>
<td></td>
</tr>
<tr>
<td>Preheater</td>
<td></td>
</tr>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Post-Treatment Device:</th>
<th>HEPA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Process Stream Characteristics</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>15. Brief Description of Process</strong></td>
<td></td>
</tr>
<tr>
<td>.</td>
<td></td>
</tr>
<tr>
<td><strong>16. Flow Data</strong></td>
<td></td>
</tr>
<tr>
<td>Gas stream temperature: AMBIENT degrees F</td>
<td></td>
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<td>Pressure drop range</td>
<td></td>
</tr>
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<tr>
<td>Low: in. H₂O</td>
<td></td>
</tr>
<tr>
<td>Dew point temperature of process stream: degrees F</td>
<td></td>
</tr>
<tr>
<td>Inlet flow rate: 43000 ACFM</td>
<td></td>
</tr>
<tr>
<td><strong>17. Dust Collection Device</strong></td>
<td></td>
</tr>
<tr>
<td>☑ Pneumatic conveyor</td>
<td></td>
</tr>
<tr>
<td>□ Rotary airlock values</td>
<td></td>
</tr>
<tr>
<td>□ Screw conveyors</td>
<td></td>
</tr>
<tr>
<td>□ Closed container</td>
<td></td>
</tr>
<tr>
<td>□ Double dump</td>
<td></td>
</tr>
<tr>
<td>□ Drag conveyor</td>
<td></td>
</tr>
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<td>☑ Manual discharge device: Slide gate OR □ Hinged doors or drawers</td>
<td></td>
</tr>
<tr>
<td><strong>18. Operating Schedule</strong></td>
<td></td>
</tr>
<tr>
<td>Normal: 10 hours/day  6 days/week  50 weeks/year</td>
<td></td>
</tr>
<tr>
<td>Maximum: 14 hours/day  7 days/week  50 weeks/year</td>
<td></td>
</tr>
</tbody>
</table>
Instructions for Form CYS

For cyclone separators only, this form may be used in place of Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

**Equipment Description**

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

**Process Stream Characteristics**

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 3 before filling out the form.

### IDENTIFICATION

1. Company Name: Bennett Lumber Products, Inc  
2. Facility Name: Bennett Lumber Products, Inc  
3. Facility ID No.: 057-00008

4. Brief Project Description: P-14 SHAVINGS CYC ON TOP OF BOILER BUILDING Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for last relevant PTC application and Tier 1 renewal

### CYCLONE SEPARATOR INFORMATION

#### Equipment Description

<table>
<thead>
<tr>
<th>7. Dimensions</th>
<th>8. Particulate Size Distribution Data</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image" alt="Diagram" /></td>
<td>Micron range</td>
</tr>
<tr>
<td></td>
<td>0.5-1.0</td>
</tr>
<tr>
<td></td>
<td>1.0-5.0</td>
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<td>10-20</td>
</tr>
<tr>
<td></td>
<td>Over 20</td>
</tr>
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9. Type of Cyclone:  
- [ ] Wet  
- [x] Dry

10. Type of Cyclone Unit:  
- [x] Single  
- [ ] Quadruple  
- [ ] Dual  
- [ ] Multiclone

11. Blower:  
- Blower horsepower:  
  - [ ] hp
- Design flow rate:  
  - [ ] scfm
- Draft:  
  - [x] Forced  
  - [ ] Induced

12. Design Criteria:  
- [x] Positive pressure  
- [ ] Negative pressure

13. Pre-Treatment Device:  
- [ ] Cyclone  
- [ ] Knock-out chamber  
- [ ] Precooler  
- [x] None  
- [ ] Preheater

14. Post-Treatment Device:  
- [ ] Baghouse/Cartridge  
- [ ] HEPA  
- [ ] Other:
## Process Stream Characteristics

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<tr>
<th>15. Brief Description of Process</th>
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<td>Pressure drop range</td>
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<td>High: UNKNOWN in. H₂O  Low: in. H₂O</td>
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<td>Dew point temperature of process stream: degrees F</td>
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<td>Inlet flow rate: 43000 ACFM</td>
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<tr>
<td>☑ Pneumatic conveyor</td>
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<td>☐ Double dump</td>
<td>☐ Drag conveyor</td>
</tr>
<tr>
<td>☐ Manual discharge device:</td>
<td>☐ Slide gate OR ☐ Hinged doors or drawers</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>18. Operating Schedule</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Normal:</td>
<td></td>
</tr>
<tr>
<td>10 hours/day</td>
<td>6 days/week</td>
</tr>
<tr>
<td>Maximum:</td>
<td></td>
</tr>
<tr>
<td>14 hours/day</td>
<td>7 days/week</td>
</tr>
</tbody>
</table>
Instructions for Form CYS

For cyclone separators only, this form may be used in place of Form EU0 and control equipment forms.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

Equipment Description

5 – 14. The information requested should be found in the operations and maintenance manual supplied by the manufacturer of the cyclone separator.

Process Stream Characteristics

15. Include a process flow diagram and engineering drawing of the filter system and the material processed. In the space provided, indicate what equipment is vented to the cyclone and how material is handled and disposed of.

16. Fill in all the requested information about flow rate.

17. Check the appropriate box to indicate the type of dust collection device.

18. Fill in the number of hours per day, days per week, or weeks per year for the normal operating schedule and separately for the maximum operating schedule.
Please see instructions on page 2 before filling out the form.

## IDENTIFICATION

<table>
<thead>
<tr>
<th>1. Company Name</th>
<th>2. Facility Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Products, Inc.</td>
<td>Bennett Lumber Products</td>
</tr>
</tbody>
</table>

| 3. Brief Project Description: | Emergency Fire water pump Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for for last relevant PTC application |

## IC ENGINE DESCRIPTION AND SPECIFICATIONS

4. Type of unit:
   - [ ] New unit
   - [ ] Unpermitted existing unit
   - [ ] Modification to an existing permitted unit? Permit number: ____________________
   - [ ] Full-time operation (non-emergency standby use)?
   - [ ] Emergency standby use only (operation limited to 100 hrs/yr for maintenance and testing and emergency use only)?
   - [ ] Emergency fire pump use only?
   - [ ] Stationary test cell/stand operation only (as defined in NSPS Subpart ZZZZ)?
   - [ ] National security operation only (as defined in NSPS Subpart ZZZZ)?
   - [ ] Institutional emergency standby IC engine (as defined in NSPS Subpart ZZZZ)?

## IC ENGINE SPECIFICATIONS

Questions 5 through 15 apply to all IC engines.

<table>
<thead>
<tr>
<th>5. IC Engine Manufacturer: John Deere</th>
<th>6. Model: 6081AF001</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Date manufactured:</td>
<td>8. Model year: before 2005</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Date of installation (if an existing IC engine): &gt; 10 yrs ago</td>
<td>10. IC Engine cylinder displacement: _______ liters per cylinder</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Maximum rated horsepower (per the data plate/manufacturer specifications): 270 bhp</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>12. EPA Certification: Tier certification number or ☐ None/not tier certified</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>13. Ignition type: ☐ Spark ☑ Compression</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Fuel combusted in the IC engine? ☑ Distillate fuel oil ☐ Natural gas/LNG ☐ LPG/propane</td>
<td></td>
</tr>
<tr>
<td>If distillate fuel oil (#1, #2, or a mixture) is used, what is the maximum sulfur content? ☐ 15 ppm (0.0015% by weight) ☐ 500 ppm (0.05% by weight)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>15. IC engine exhaust stack parameters: Diameter _______ inches Height _______ feet Temperature _______ ºF Flow rate _______ acfm</td>
<td></td>
</tr>
</tbody>
</table>

## IC ENGINE EMISSIONS PARAMETERS

Questions 16 through 27 apply to full-time non-Tier certified IC engines or Tier certified IC engines manufactured prior to July 11, 2005. If you are proposing a Tier certified IC engine manufactured on and after July 11, 2005 or an emergency standby IC engine do not answer questions 17 through 27.

| 16. Testing schedule (for emergency standby IC engines only): _______ hrs/day _______ hrs/mon _______ hrs/qtr _______ hrs/yr |
| 17. Maximum daily operation: <1 hrs/day 18. Maximum annual operation: 500 hrs/yr Note: These operational limits will be placed in the permit. |
|                                      |                      |
| 19. Will CO emissions be limited to a specific ppmvd (i.e. 49 or 23 ppmvd)? ☐ Yes ☑ No 20. What will the CO emissions limit be? _______ ppmvd |
| 21. Will CO emissions be reduced by 70% or more? ☐ Yes ☑ No |
| 22. Will a CEMS (Continuous Emissions Monitoring System) be used to measure pollutants in the IC engine exhaust stream? ☐ Yes ☑ No |
| 23. Will a CPMS (Continuous Parameters Monitoring System) be used to measure parameters of the IC engine exhaust stream? ☐ Yes ☑ No |
| 24. Will the IC engine be equipped with an oxidation catalyst? ☐ Yes ☑ No |
| 25. If applicable, will the oxidation catalyst be equipped with a temperature measurement system to ensure it is operating properly? ☐ Yes ☑ No |
| 26. Will the IC engine be equipped with a diesel particulate filter? ☐ Yes ☑ No |
| 27. If applicable, will the diesel particulate filter be equipped with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached? ☐ Yes ☑ No |
1 – 3. Provide the same company name, facility name (if different), and brief project description as on Form GI. This is useful if the application pages are separated.

**USE ATTACHMENT IF ADDITIONAL SPACE IS REQUIRED.**

**General Information:**

4. Indicate whether the IC engine is a new unit, unpermitted existing unit, being modified, and whether it will be permitted to operate full-time or for emergency use only.

**IC Engine Specifications:**

5-8. Provide the IC engine manufacturer, model, date the IC engine was manufactured, and the model year (used for EPA certification purposes) of the IC engine.

9. Provide the date of installation of the IC engine.

10. Provide the IC engine cylinder displacement (i.e. 12 liter engine with 8 cylinders = 1.5 liters per cylinder).

11. Provide the maximum horsepower of the IC engine (per the data plate) in bhp.

12. Provide the EPA Tier certification number of the IC engine (i.e. 1, 2, 3, or 4).

13. Provide the IC engine ignition type.

14. Check which fuel is combusted in the IC engine. If distillate fuel oil is combusted, check the maximum proposed sulfur content of the fuel.

15. Provide the IC engine exhaust stack parameters. The temperature and flow rate should be per the IC engine manufacturer. If the stack height is very tall, provide a justification for the exhaust gas temperature.

**IC Engine Emissions Parameters:**

Questions 16 through 27 apply to full-time non-Tier certified IC engines or Tier certified IC engines manufactured prior to July 11, 2005. If you are proposing a Tier certified IC engine manufactured on and after July 11, 2005 or an emergency standby IC engine do not answer questions 17 through 27.

16. For emergency IC engines only, propose a testing schedule.

17. Propose a maximum daily IC engine hourly limit. **Note:** Unless it is 24 hours per day of operation, this proposed daily hourly limit will be placed in the permit.

18. Propose a maximum annual IC engine hourly limit. **Note:** Unless it is 8,760 hours per year of operation, this proposed annual hourly limit will be placed in the permit.

19-21. Subpart ZZZZ requires that CO emissions in the exhaust from existing non-Tier certified IC engines are either limited to a specific concentration, 49 ppmvd for engines rated at 300 bhp to ≤ 500 bhp or 23 ppmvd for engines rated at > 500 bhp, or are to reduce the CO concentration by 70% or more. Therefore, “yes” should only be answered to one of these two questions.

22-23. Subpart ZZZZ requires that, for IC engines rated at > 500 bhp, Applicants either install a CEMS (Continuous Emissions Monitoring System) or a CPMS (Continuous Parameters Monitoring System) in the exhaust stream to demonstrate compliance with the emissions limitations. Therefore, “yes” should only be answered to one of these two questions.

24. Specify if the IC engine is equipped, or will need to be equipped, with an oxidation catalyst to comply with the emissions limitations of Subpart ZZZZ.

25. Specify if the oxidation catalyst will be equipped with a temperature measurement system to ensure that it is operating properly to comply with the emissions limitations of Subpart ZZZZ.

26. Specify if the IC engine is equipped, or will need to be equipped, with a diesel particulate filter to comply with the emissions limitations of Subpart ZZZZ.

27. Specify if the diesel particulate filter will be equipped with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.
Please see instructions on page 2 before filling out the form.

**COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER**

<table>
<thead>
<tr>
<th>1. Company Name</th>
<th>Bennett Lumber Products</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Facility Name</td>
<td>Bennett Lumber Products</td>
</tr>
<tr>
<td>3. Facility ID No.</td>
<td>057-00008</td>
</tr>
<tr>
<td>4. Brief Project Description - One sentence or less</td>
<td>Tier 1 AQ operating permit renewal</td>
</tr>
</tbody>
</table>

**PERMIT APPLICATION TYPE**

- Initial Tier I
- Tier I Administrative Amendment
- Tier I Minor Modification
- Tier I Significant Modification
- Tier I Renewal: Permit No.: T1-050201 Date Issued: 2/11/10, amended 1/17/11

**FORMS INCLUDED**

<table>
<thead>
<tr>
<th>Include</th>
<th>N/A</th>
<th>Forms</th>
<th>DEQ Verify</th>
</tr>
</thead>
<tbody>
<tr>
<td>✔️</td>
<td>☐</td>
<td>Form CSTI – Cover Sheet</td>
<td>☐</td>
</tr>
<tr>
<td>✔️</td>
<td>☐</td>
<td>Form GI – Facility Information</td>
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<tr>
<td>✔️</td>
<td>☐</td>
<td>Form EU0 – Emissions Units General</td>
<td>☐</td>
</tr>
<tr>
<td>✔️</td>
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<td>Form EU1 – Industrial Engine Information</td>
<td>Please specify number of EU1s attached: 1</td>
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<tr>
<td>☐</td>
<td>☐</td>
<td>Form EU2– Nonmetallic Mineral Processing Plants</td>
<td>Please specify number of EU2s attached: 0</td>
</tr>
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<td>☐</td>
<td>☐</td>
<td>Form EU3– Spray Paint Booth Information</td>
<td>Please specify number of EU3s attached: 0</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
<td>Form EU4– Cooling Tower Information</td>
<td>Please specify number of EU4s attached: 0</td>
</tr>
<tr>
<td>✔️</td>
<td>☐</td>
<td>Form EU5 – Boiler Information</td>
<td>Please specify number of EU5s attached: 1</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
<td>Form CBP– Concrete Batch Plant</td>
<td>Please Specify number of CBPs attached: 0</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
<td>Form HMAP – Hot Mix Asphalt Plant</td>
<td>Please specify number of HMAPs attached:</td>
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<tr>
<td>☐</td>
<td>☐</td>
<td>PERF – Portable Equipment Relocation Form</td>
<td>☐</td>
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<tr>
<td>☐</td>
<td>☐</td>
<td>Form BCE– Baghouses Control Equipment</td>
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<tr>
<td>☐</td>
<td>☐</td>
<td>Form SCE– Scrubbers Control Equipment</td>
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<td>☐</td>
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<td>Form VSCE – Venturi Scrubber Control Equipment</td>
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<td>☐</td>
<td>☐</td>
<td>Form ESP – Electrostatic Precipitator</td>
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<td>☐</td>
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<td>Form AO – Afterburner/Oxidizer</td>
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<td>☐</td>
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<td>Form CYS – Cyclone Separator</td>
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<td>☐</td>
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<td>Form CA – Carbon Adsorber</td>
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<td>☐</td>
<td>Forms EI-CP1 - EI-CP4– Emissions Inventory– criteria pollutants (Excel workbook, all 4 worksheets)</td>
<td>☐</td>
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<tr>
<td>☐</td>
<td>☐</td>
<td>Form CAM – Compliance Assurance Monitoring</td>
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<tr>
<td>✔️</td>
<td>☐</td>
<td>Form FRA – Federal Regulation Applicability</td>
<td>☐</td>
</tr>
</tbody>
</table>
Instructions for Form CSTI

This form is the cover sheet for an air quality permit application. It provides DEQ with basic information regarding the company and the proposed permitting action. This form helps DEQ efficiently determine whether the application is administratively complete. This form also provides the applicant with a list of forms available to aid the applicant to successfully submit a complete application.

Company Name, Facility Name, and Facility ID Number
1-3. Provide the name of your company, the name of the facility (if different than company name), and the facility identification (ID) number (Facility ID No.) in the boxes provided. The facility ID number is also known as the AIRS number or AIRS/AFS number (example: 095-00077). If you already have a permit, the facility ID number is located in the upper right hand corner of the cover page. The facility ID number must be provided unless your facility has not received one, in which case you may leave this box empty. Use these same names and ID number on all forms. This is useful in case any pages of the application are separated.

4. Provide a brief description of this permitting project in one sentence or less. Examples might be “Tier I Administrative Amendment to allow for the change of ownership of this facility” or “Tier I Significant Modification to change the existing monitoring, recordkeeping, and reporting requirements Boiler #1.” This description will be used by DEQ as a unique identifier for this permitting project, in conjunction with the name(s) and ID number referenced in 1-3. You will need to put this description, using the exact same words, on all other forms that are part of this project application. This is useful in case any pages of the application are separated.

If this Tier I is being issued as a result of a PTC issued pursuant to IDAPA 58.01.01.209.05.c, the source or modification may operate upon submittal for an administrative amendment issued pursuant to IDAPA 58.01.01.381.

Permit Application Type
5. Provide the reason you are submitting the permit application by checking the appropriate box and filling in the number and/or date if needed.

Forms Included
Check the “Included” box for each form included in this permit to construct application. If there are multiples of a form for multiple units of that type, check the box and fill in the number of forms in the blank provided.

The “N/A” box should only be checked if the form is absolutely unnecessary to complete the application. Additional information may be requested.

When complete, enclose the hardcopy application certified by a responsible official (as defined in IDAPA 58.01.01.006.94), and send to:

Air Quality Program Office – Application Processing
Department of Environmental Quality
1410 N. Hilton
Boise, ID  83706-1255
**IDENTIFICATION**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Facility Name:</th>
<th>Facility ID No:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Products, Inc</td>
<td>BLP Princeton</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

**Brief Project Description:** Tier 1 AQ Operating Permit renewal

---

**EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

1. **Emissions Unit (EU) Name:** FACILITY-WIDE FUGITIVES
2. **EU ID Number:** P1-5, P8-10, P21-23, ALL ST AND TR ST AND TR EMISS
3. **EU Type:** □ New Source □ Unpermitted Existing Source □ Modification to a Permitted Source – Previous Permit #: PTC No. P2-050206 Date Issued: 10/05
4. **Manufacturer:** N/A
5. **Model:**
6. **Maximum Capacity:** CONTROLLED BY KILN THROUGHPUT LIMIT, MATERIAL BAL
7. **Date of Construction:** VARIES, MOST DATE BACK >10 YRS
8. **Date of Modification (if any):** NONE RECENTLY
9. **Is this a Controlled Emission Unit?** □ No □ Yes  If Yes, complete the following section. If No, go to line 18.

---

**EMISSIONS CONTROL EQUIPMENT**

10. **Control Equipment Name and ID:**
11. **Date of Installation:**
12. **Date of Modification (if any):**
13. **Manufacturer and Model Number:**
14. **ID(s) of Emission Unit Controlled:**
15. **Is operating schedule different than emission units(s) involved?** □ Yes □ No
16. **Does the manufacturer guarantee the control efficiency of the control equipment?** □ Yes □ No  (If Yes, attach and label manufacturer guarantee)

<table>
<thead>
<tr>
<th>Pollutant Controlled</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
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</tr>
<tr>
<td>PM10</td>
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<tr>
<td>SO₂</td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td></td>
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<tr>
<td>VOC</td>
<td></td>
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<tr>
<td>CO</td>
<td></td>
</tr>
</tbody>
</table>

17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

---

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

18. **Actual Operation** 8760 HRS/YR
19. **Maximum Operation** KILNS 157585 MMBF/YR CUMULATIVELY, MATERIAL BALANCE

---

**REQUESTED LIMITS**

20. **Are you requesting any permit limits?** □ Yes □ No  (If Yes, check all that apply below)

- □ Operation Hour Limit(s):
- □ Production Limit(s): 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS
- □ Material Usage Limit(s):
- □ Limits Based on Stack Testing Please attach all relevant stack testing summary reports
- □ Other:

21. **Rationale for Requesting the Limit(s):** SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE
Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emission unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

Please put the same company name, facility name (if different), facility ID number, and brief project description as on Form CS in the boxes provided. This is useful in case any pages of the application get separated.

1. Provide the name of the emissions unit (EU), such as “Union boiler,” etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

2. Provide the identification (ID) number of the EU. It can be any unique identifier you choose; however, this ID number should be unique to this EU and should be used consistently throughout this application and all other air quality permit applications (e.g., operating permit application) to identify this EU.

3. Indicate the type of EU by checking the appropriate box (e.g., a new source to be constructed, an unpermitted existing source (as-built) applying for the first time, or an existing permitted source to be modified). If the EU is being modified, indicate on the form the most recent permit issued for the EU.

4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

5. Provide the model number of the EU. If the EU is custom-designed or homemade, indicate so.

6. Provide the maximum capacity of the EU. For example, a boiler’s capacity may be in MMBtu/hr in terms of heat input of natural gas; an assembly line capacity may be in parts produced per day. Capacity should be based on a rated nameplate or as stated in the manufacturer’s literature.

7. The date of construction is the month, day, and year in which construction or modification was commenced.

Definitions:

Construction fabrication, erection, or installation of an affected facility.

Commenced an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.

Modification any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

9. Indicate if emissions from the EU are controlled by air pollution control equipment. If the answer is yes, complete the next section. If the answer is no, go to line 18.

10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment’s identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
11. Provide the date the air pollution control equipment was installed.
12. If the air pollution control equipment has been modified, provide the date of the modification.
13. Provide the name of the manufacturer and the model number for the air pollution control equipment.
14. If this air pollution control equipment controls emissions from more than this EU, provide the identification number(s) of the other EU(s).
15. Indicate if this air pollution control equipment operates on a schedule different from the EU(s) it controls.
16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).
17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.
18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.
19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.
20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.
21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
**IDENTIFICATION**

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<th>Facility ID No:</th>
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<tbody>
<tr>
<td>Bennett Lumber Products, Inc</td>
<td>BLP Princeton</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and previously permitted.

**EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

1. Emissions Unit (EU) Name: KILN 1
2. EU ID Number: P15
3. EU Type: New Source
4. Manufacturer: MOORE
5. Model: 73’ DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS
6. Maximum Capacity: APPROX 200MBF/CHARGE
7. Date of Construction: BEFORE 1980
8. Date of Modification (if any): NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED
9. Is this a Controlled Emission Unit? No

**EMISSIONS CONTROL EQUIPMENT**

10. Control Equipment Name and ID:
11. Date of Installation:
12. Date of Modification (if any):
13. Manufacturer and Model Number:
14. ID(s) of Emission Unit Controlled:
15. Is operating schedule different than emission units(s) involved? Yes
16. Does the manufacturer guarantee the control efficiency of the control equipment? Yes

<table>
<thead>
<tr>
<th>Pollutant Controlled</th>
<th>Control Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
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<td>SO₂</td>
<td>NOx</td>
</tr>
<tr>
<td>VOC</td>
<td>CO</td>
</tr>
</tbody>
</table>

17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

18. Actual Operation: 8300 HRS/YR
19. Maximum Operation: 8500 HRS/YR

**REQUESTED LIMITS**

20. Are you requesting any permit limits? Yes

- Operation Hour Limit(s): NONE
- Production Limit(s): 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS
- Material Usage Limit(s):
- Limits Based on Stack Testing: Please attach all relevant stack testing summary reports
- Other:

21. Rationale for Requesting the Limit(s): SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE
Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emission unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

Please put the same company name, facility name (if different), facility ID number, and brief project description as on Form CS in the boxes provided. This is useful in case any pages of the application get separated.

1. Provide the name of the emissions unit (EU), such as "Union boiler," etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

2. Provide the identification (ID) number of the EU. It can be any unique identifier you choose; however, this ID number should be unique to this EU and should be used consistently throughout this application and all other air quality permit applications (e.g., operating permit application) to identify this EU.

3. Indicate the type of EU by checking the appropriate box (e.g., a new source to be constructed, an unpermitted existing source (as-built) applying for the first time, or an existing permitted source to be modified). If the EU is being modified, indicate on the form the most recent permit issued for the EU.

4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

5. Provide the model number of the EU. If the EU is custom-designed or homemade, indicate so.

6. Provide the maximum capacity of the EU. For example, a boiler's capacity may be in MMBtu/hr in terms of heat input of natural gas; an assembly line capacity may be in parts produced per day. Capacity should be based on a rated nameplate or as stated in the manufacturer's literature.

7. The date of construction is the month, day, and year in which construction or modification was commenced.

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Commenced an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.

Modification any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

9. Indicate if emissions from the EU are controlled by air pollution control equipment. If the answer is yes, complete the next section. If the answer is no, go to line 18.

10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment's identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
11. Provide the date the air pollution control equipment was installed.

12. If the air pollution control equipment has been modified, provide the date of the modification.

13. Provide the name of the manufacturer and the model number for the air pollution control equipment.

14. If this air pollution control equipment controls emissions from more than this EU, provide the identification number(s) of the other EU(s).

15. Indicate if this air pollution control equipment operates on a schedule different from the EU(s) it controls.

16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).

17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.

18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.

19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.

20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.

21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
Please see instructions on page 2 before filling out the form.

**IDENTIFICATION**

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<tr>
<td>Bennett Lumber Products, Inc</td>
<td>BLP Princeton</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

**Brief Project Description:** Tier 1 AQ Operating Permit renewal: same data as previously submitted and described.

**EMISSION UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

<table>
<thead>
<tr>
<th>1. Emissions Unit (EU) Name:</th>
<th>KILN 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. EU ID Number:</td>
<td>P16</td>
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<tr>
<td>3. EU Type:</td>
<td>New Source</td>
</tr>
<tr>
<td>4. Manufacturer:</td>
<td>MOORE</td>
</tr>
<tr>
<td>5. Model:</td>
<td>73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS</td>
</tr>
<tr>
<td>6. Maximum Capacity:</td>
<td>APPROX 200MBF/CHARGE</td>
</tr>
<tr>
<td>7. Date of Construction:</td>
<td>BEFORE 1980</td>
</tr>
<tr>
<td>8. Date of Modification (if any):</td>
<td>NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED</td>
</tr>
<tr>
<td>9. Is this a Controlled Emission Unit?</td>
<td>No</td>
</tr>
</tbody>
</table>

**EMISSIONS CONTROL EQUIPMENT**

| 10. Control Equipment Name and ID: | |
| 11. Date of Installation: | |
| 12. Date of Modification (if any): | |
| 13. Manufacturer and Model Number: | |
| 14. ID(s) of Emission Unit Controlled: | |
| 15. Is operating schedule different than emission units(s) involved? | Yes |
| 16. Does the manufacturer guarantee the control efficiency of the control equipment? | Yes |

<table>
<thead>
<tr>
<th>Pollutant Controlled</th>
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<tbody>
<tr>
<td>PM</td>
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</tbody>
</table>

17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

| 18. Actual Operation | 8300 HRS/YR |
| 19. Maximum Operation | 8500 HRS/YR |

**REQUESTED LIMITS**

<table>
<thead>
<tr>
<th>20. Are you requesting any permit limits?</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation Hour Limit(s):</td>
<td>NONE</td>
</tr>
<tr>
<td>Production Limit(s):</td>
<td>157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS</td>
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<td>Material Usage Limit(s):</td>
<td></td>
</tr>
<tr>
<td>Limits Based on Stack Testing</td>
<td>Please attach all relevant stack testing summary reports</td>
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<td>Other:</td>
<td></td>
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<tr>
<td>21. Rationale for Requesting the Limit(s):</td>
<td>SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE</td>
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Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emission unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

Please put the same company name, facility name (if different), facility ID number, and brief project description as on Form CS in the boxes provided. This is useful in case any pages of the application get separated.

1. Provide the name of the emissions unit (EU), such as “Union boiler,” etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

2. Provide the identification (ID) number of the EU. It can be any unique identifier you choose; however, this ID number should be unique to this EU and should be used consistently throughout this application and all other air quality permit applications (e.g., operating permit application) to identify this EU.

3. Indicate the type of EU by checking the appropriate box (e.g., a new source to be constructed, an unpermitted existing source (as-built) applying for the first time, or an existing permitted source to be modified). If the EU is being modified, indicate on the form the most recent permit issued for the EU.

4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

5. Provide the model number of the EU. If the EU is custom-designed or homemade, indicate so.

6. Provide the maximum capacity of the EU. For example, a boiler’s capacity may be in MMBtu/hr in terms of heat input of natural gas; an assembly line capacity may be in parts produced per day. Capacity should be based on a rated nameplate or as stated in the manufacturer's literature.

7. The date of construction is the month, day, and year in which construction or modification was commenced.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

9. Indicate if emissions from the EU are controlled by air pollution control equipment. If the answer is yes, complete the next section. If the answer is no, go to line 18.

10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment’s identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
11. Provide the date the air pollution control equipment was installed.

12. If the air pollution control equipment has been modified, provide the date of the modification.

13. Provide the name of the manufacturer and the model number for the air pollution control equipment.

14. If this air pollution control equipment controls emissions from more than this EU, provide the identification number(s) of the other EU(s).

15. Indicate if this air pollution control equipment operates on a schedule different from the EU(s) it controls.

16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).

17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.

18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.

19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.

20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.

21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
Please see instructions on page 2 before filling out the form.

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<td>057-00008</td>
</tr>
</tbody>
</table>

Brief Project Description: Tier 1 AQ Operating Permit: approved by IDEQ for for last relevant PTC

#### EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name: KILN 3
2. EU ID Number: P17
3. EU Type: New Source
4. Manufacturer: LSI
5. Model: 73’ SINGLE TRACK VENTED VIA HUMIDITY CONTROL LIDS
6. Maximum Capacity: APPROX 100MBF/CHARGE
7. Date of Construction: 1984
8. Date of Modification (if any): NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED
9. Is this a Controlled Emission Unit? **No**

#### EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:
11. Date of Installation:  
12. Date of Modification (if any):
13. Manufacturer and Model Number: 
14. ID(s) of Emission Unit Controlled:
15. Is operating schedule different than emission units(s) involved? **No**
16. Does the manufacturer guarantee the control efficiency of the control equipment? **No**

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<tr>
<th>Control Efficiency</th>
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<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
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<td></td>
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17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

#### EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation 8300 HRS/YR
19. Maximum Operation 8500 HRS?YR

#### REQUESTED LIMITS

20. Are you requesting any permit limits? **Yes**

- Operation Hour Limit(s): NONE
- Production Limit(s): 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS
- Material Usage Limit(s): 
- Limits Based on Stack Testing: Please attach all relevant stack testing summary reports
- Other: 

21. Rationale for Requesting the Limit(s): SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE
Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emission unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

Please put the same company name, facility name (if different), facility ID number, and brief project description as on Form CS in the boxes provided. This is useful in case any pages of the application get separated.

1. Provide the name of the emissions unit (EU), such as “Union boiler,” etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

2. Provide the identification (ID) number of the EU. It can be any unique identifier you choose; however, this ID number should be unique to this EU and should be used consistently throughout this application and all other air quality permit applications (e.g., operating permit application) to identify this EU.

3. Indicate the type of EU by checking the appropriate box (e.g., a new source to be constructed, an unpermitted existing source (as-built) applying for the first time, or an existing permitted source to be modified). If the EU is being modified, indicate on the form the most recent permit issued for the EU.

4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

5. Provide the model number of the EU. If the EU is custom-designed or homemade, indicate so.

6. Provide the maximum capacity of the EU. For example, a boiler's capacity may be in MMBtu/hr in terms of heat input of natural gas; an assembly line capacity may be in parts produced per day. Capacity should be based on a rated nameplate or as stated in the manufacturer's literature.

7. The date of construction is the month, day, and year in which construction or modification was commenced.

Definitions:

**Construction** fabrication, erection, or installation of an affected facility.

**Commenced** an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.

**Modification** any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

9. Indicate if emissions from the EU are controlled by air pollution control equipment. If the answer is yes, complete the next section. If the answer is no, go to line 18.

10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment’s identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
11. Provide the date the air pollution control equipment was installed.
12. If the air pollution control equipment has been modified, provide the date of the modification.
13. Provide the name of the manufacturer and the model number for the air pollution control equipment.
14. If this air pollution control equipment controls emissions from more than this EU, provide the identification number(s) of the other EU(s).
15. Indicate if this air pollution control equipment operates on a schedule different from the EU(s) it controls.
16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).
17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.
18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.
19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.
20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.
21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
Please see instructions on page 2 before filling out the form.

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</tr>
</tbody>
</table>

Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and d b  IDEQ li ti

**EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

1. Emissions Unit (EU) Name: KILN 4
2. EU ID Number: P18
3. EU Type: Unpermitted Existing Source
4. Manufacturer: LUMBER SYSTEMS INC
5. Model: 73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS
6. Maximum Capacity: APPROX 200MBF/CHARGE
7. Date of Construction: BEFORE 1980
8. Date of Modification (if any): NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED
9. Is this a Controlled Emission Unit? No

**EMISSIONS CONTROL EQUIPMENT**

10. Control Equipment Name and ID:
11. Date of Installation: 12. Date of Modification (if any):
13. Manufacturer and Model Number:
14. ID(s) of Emission Unit Controlled:
15. Is operating schedule different than emission units(s) involved? Yes
16. Does the manufacturer guarantee the control efficiency of the control equipment? Yes

<table>
<thead>
<tr>
<th>Pollutant Controlled</th>
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</tr>
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<tbody>
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<td>PM</td>
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<td>SO2</td>
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<td>NOx</td>
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<tr>
<td>VOC</td>
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<tr>
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</tr>
</tbody>
</table>

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

18. Actual Operation: 8300 HRS/YR
19. Maximum Operation: 8500 HRS?YR

**REQUESTED LIMITS**

20. Are you requesting any permit limits? Yes
21. Rationale for Requesting the Limit(s): SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE

- Operation Hour Limit(s): NONE
- Production Limit(s): 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS
- Material Usage Limit(s):
- Limits Based on Stack Testing: Please attach all relevant stack testing summary reports
- Other:
Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emission unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

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1. Provide the name of the emissions unit (EU), such as “Union boiler,” etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

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any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

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11. Provide the date the air pollution control equipment was installed.
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13. Provide the name of the manufacturer and the model number for the air pollution control equipment.
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16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).
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20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.
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DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Emissions Unit - General Form EU0
PERMIT TO CONSTRUCT APPLICATION
Revision 3
03/27/07

Please see instructions on page 2 before filling out the form.

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**Brief Project Description:** Tier 1 AQ Operating Permit renewal: same data as previously submitted and

**EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

1. Emissions Unit (EU) Name: KILN 5

2. EU ID Number: P19

3. EU Type: [ ] New Source [ ] Unpermitted Existing Source [ ] Modification to a Permitted Source – Previous Permit #: P-050206 Date Issued: 10/6/05

4. Manufacturer: LUMBER SYSTEMS INC

5. Model: 73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS

6. Maximum Capacity: APPROX 200MBF/CHARGE

7. Date of Construction: BEFORE 1980

8. Date of Modification (if any) NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED

9. Is this a Controlled Emission Unit? [ ] No [ ] Yes If Yes, complete the following section. If No, go to line 18.

**EMISSIONS CONTROL EQUIPMENT**

10. Control Equipment Name and ID:

11. Date of Installation: ____________________________

12. Date of Modification (if any):

13. Manufacturer and Model Number:

14. ID(s) of Emission Unit Controlled:

15. Is operating schedule different than emission units(s) involved? [ ] Yes [ ] No

16. Does the manufacturer guarantee the control efficiency of the control equipment? [ ] Yes [ ] No (If Yes, attach and label manufacturer guarantee)

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17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

18. Actual Operation 8300 HRS/YR

19. Maximum Operation 8500 HRS/YR

**REQUESTED LIMITS**

20. Are you requesting any permit limits? [ ] Yes [ ] No (If Yes, check all that apply below)

- [ ] Operation Hour Limit(s): NONE
- [ ] Production Limit(s): 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS
- [ ] Material Usage Limit(s):
- [ ] Limits Based on Stack Testing Please attach all relevant stack testing summary reports
- [ ] Other:

21. Rationale for Requesting the Limit(s): SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE
Instructions for Form EU0

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4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

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10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment’s identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
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19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.
20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.
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Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and

**EMISSION UNIT (PROCESS) IDENTIFICATION & DESCRIPTION**

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<th>KILN 6</th>
</tr>
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<tbody>
<tr>
<td>2. EU ID Number:</td>
<td>P20</td>
</tr>
<tr>
<td>3. EU Type:</td>
<td>□ New Source □ Unpermitted Existing Source □ Modification to a Permitted Source – Previous Permit #: P-050206 Date Issued: 10/6/05</td>
</tr>
<tr>
<td>4. Manufacturer:</td>
<td>WELLONS</td>
</tr>
<tr>
<td>5. Model:</td>
<td>73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS</td>
</tr>
<tr>
<td>6. Maximum Capacity:</td>
<td>APPROX 200MBF/CHARGE</td>
</tr>
<tr>
<td>7. Date of Construction:</td>
<td>1989</td>
</tr>
<tr>
<td>8. Date of Modification (if any):</td>
<td>NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED</td>
</tr>
<tr>
<td>9. Is this a Controlled Emission Unit?:</td>
<td>□ No □ Yes If Yes, complete the following section. If No, go to line 18.</td>
</tr>
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**EMISSIONS CONTROL EQUIPMENT**

| 10. Control Equipment Name and ID: |
| 11. Date of Installation:         | 12. Date of Modification (if any): |
| 13. Manufacturer and Model Number: | |
| 14. ID(s) of Emission Unit Controlled: |
| 15. Is operating schedule different than emission units(s) involved?: | □ Yes □ No |
| 16. Does the manufacturer guarantee the control efficiency of the control equipment?: | □ Yes □ No (If Yes, attach and label manufacturer guarantee) |

<table>
<thead>
<tr>
<th>Pollutant Controlled</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
</tr>
<tr>
<td>PM10</td>
</tr>
<tr>
<td>SO2</td>
</tr>
<tr>
<td>NOx</td>
</tr>
<tr>
<td>VOC</td>
</tr>
<tr>
<td>CO</td>
</tr>
</tbody>
</table>

17. If manufacturer’s data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

**EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)**

| 18. Actual Operation | 8300 HRS/yr |
| 19. Maximum Operation| 8500 HRS/yr |

**REQUESTED LIMITS**

| 20. Are you requesting any permit limits?: | ☑ Yes □ No (If Yes, check all that apply below) |
| Operation Hour Limit(s): | NONE |
| Production Limit(s): | 157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS |
| Material Usage Limit(s): | |
| Limits Based on Stack Testing | Please attach all relevant stack testing summary reports |
| Other: | |

| 21. Rationale for Requesting the Limit(s): | SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE |
Instructions for Form EU0

This form provides DEQ with information about an emissions unit. An emissions unit is the equipment or process that generates emissions of regulated air pollutant(s). This form is used by the permit writer to become familiar with the emissions unit (EU). This form is also used by DEQ to identify the control equipment and the emission point (stack or vent) used for the emissions unit(s) proposed in this permit application. This form also asks for supporting documents to verify stated control efficiencies and details about the emission point. Additional information may be requested.

Please put the same company name, facility name (if different), facility ID number, and brief project description as on Form CS in the boxes provided. This is useful in case any pages of the application get separated.

1. Provide the name of the emissions unit (EU), such as “Union boiler,” etc. Use the exact same name for this EU throughout all the application forms. A separate EU0 form is required for each emissions unit.

2. Provide the identification (ID) number of the EU. It can be any unique identifier you choose; however, this ID number should be unique to this EU and should be used consistently throughout this application and all other air quality permit applications (e.g., operating permit application) to identify this EU.

3. Indicate the type of EU by checking the appropriate box (e.g., a new source to be constructed, an unpermitted existing source (as-built) applying for the first time, or an existing permitted source to be modified). If the EU is being modified, indicate on the form the most recent permit issued for the EU.

4. Provide the manufacturer's name for the EU. If the EU is custom-designed or homemade, indicate so.

5. Provide the model number of the EU. If the EU is custom-designed or homemade, indicate so.

6. Provide the maximum capacity of the EU. For example, a boiler's capacity may be in MMBtu/hr in terms of heat input of natural gas; an assembly line capacity may be in parts produced per day. Capacity should be based on a rated nameplate or as stated in the manufacturer's literature.

7. The date of construction is the month, day, and year in which construction or modification was commenced.

Definitions:

Construction  fabrication, erection, or installation of an affected facility.

Commenced  an owner or operator has undertaken a continuous program of construction or modification or that an owner or operator has entered into a contractual obligation to undertake and complete, within a reasonable time, a continuous program of construction or modification.

Modification  any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

9. Indicate if emissions from the EU are controlled by air pollution control equipment. If the answer is yes, complete the next section. If the answer is no, go to line 18.

10. Provide the name of the air pollution control equipment (e.g., wet scrubber) and the control equipment's identification number. This identification number should be unique to this air pollution control equipment and should be used consistently throughout this and all other air quality permit applications (e.g., operating permit application) to identify this air pollution control equipment.
11. Provide the date the air pollution control equipment was installed.
12. If the air pollution control equipment has been modified, provide the date of the modification.
13. Provide the name of the manufacturer and the model number for the air pollution control equipment.
14. If this air pollution control equipment controls emissions from more than this EU, provide the identification number(s) of the other EU(s).
15. Indicate if this air pollution control equipment operates on a schedule different from the EU(s) it controls.
16. Indicate if the air pollution control manufacturer guarantees the control efficiency of the control equipment. If the answer is yes, attach the manufacturer’s guarantee and label it with the air pollution control equipment identification number. Indicate the control efficiency for the target pollutant(s).
17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.
18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.
19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.
20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.
21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
**IDENTIFICATION**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Facility Name:</th>
<th>Facility ID No:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bennett Lumber Products, Inc</td>
<td>BLP Princeton</td>
<td>057-00008</td>
</tr>
</tbody>
</table>

Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and

EMISSION UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

<table>
<thead>
<tr>
<th>1. Emissions Unit (EU) Name:</th>
<th>KILN 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. EU ID Number:</td>
<td>P25</td>
</tr>
<tr>
<td>3. EU Type:</td>
<td>New Source</td>
</tr>
<tr>
<td></td>
<td>Unpermitted Existing Source</td>
</tr>
<tr>
<td></td>
<td>Modification to a Permitted Source – Previous Permit #: P-050206 Date Issued: 10/6/05</td>
</tr>
<tr>
<td>4. Manufacturer:</td>
<td>WELLONS</td>
</tr>
<tr>
<td>5. Model:</td>
<td>73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS</td>
</tr>
<tr>
<td>6. Maximum Capacity:</td>
<td>APPROX 200MBF/CHARGE</td>
</tr>
<tr>
<td>7. Date of Construction:</td>
<td>2005</td>
</tr>
<tr>
<td>8. Date of Modification (if any)</td>
<td>NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED</td>
</tr>
<tr>
<td>9. Is this a Controlled Emission Unit?</td>
<td>No</td>
</tr>
</tbody>
</table>

EMISSIONS CONTROL EQUIPMENT

| 10. Control Equipment Name and ID: |  |
| 11. Date of Installation:         |  |
| 12. Date of Modification (if any):|  |
| 13. Manufacturer and Model Number:|  |
| 14. ID(s) of Emission Unit Controlled: |  |
| 15. Is operating schedule different than emission units(s) involved? | Yes No |
| 16. Does the manufacturer guarantee the control efficiency of the control equipment? | Yes No |

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<thead>
<tr>
<th>Pollutant Controlled</th>
<th>Control Efficiency</th>
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<tbody>
<tr>
<td>PM</td>
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EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

| 18. Actual Operation | 8300 HRS/YR |
| 19. Maximum Operation | 8500 HRS/YR |

REQUESTED LIMITS

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<th>No ☐</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation Hour Limit(s):</td>
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<td></td>
</tr>
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<td>157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS</td>
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<tr>
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<td></td>
</tr>
<tr>
<td>Limits Based on Stack Testing</td>
<td>Please attach all relevant stack testing summary reports</td>
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<td>Other:</td>
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<td></td>
</tr>
<tr>
<td>21. Rationale for Requesting the Limit(s):</td>
<td>SETS THROUGHPUT FOR ALL OTHER PROCESSES VIA MATERIAL BALANCE</td>
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Definitions:

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Modification any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted to the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) to the atmosphere not previously emitted.

8. If the EU has been or will be modified, provide the month, day, and year of the most recent or future modification as defined in IDAPA 58.01.01.006.55.

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17. If the control efficiency of the air pollution control equipment is not guaranteed, attach the design specifications and any performance data to support the control efficiency stated in part 16. Label the supporting documentation with the air pollution control equipment identification number.

18. Provide the projected actual operating schedule for the emission unit in hours/day, hours/year, or other.

19. Provide the maximum operating schedule for the emission unit in hours/day, hours/year, or other.

20. If you are requesting to have limits placed on this EU, mark “Yes.” Then, check the applicable requested limit(s) and provide the limit(s). For example, production limits may be in terms of parts produced per year, material usage limits may be in gallons per day.

21. Please provide the reason you are requesting limits, if any. This helps DEQ and the applicant determine whether the limits are necessary, and if they will accomplish the desired purpose. Provide supporting documentation (calculations, modeling assessment, regulatory review, etc.) for each limit requested.
Please see instructions on pages 3-8 before filling out the form.

### IDENTIFICATION

1. Company Name: Bennett Lumber Products
2. Facility Name: Bennett Lumber Products
3. Facility ID No.: 

4. Brief Project Description: Tier 1 air permit renewal. All info is unchanged from Table 4.3 in the facility's current IDEQ Title V permit and Section 8 of that permits statement of basis, which provides more detail than this form allows.

### MONITORING APPROACH SUBMITTAL

**Background**

5. Emissions Unit Description: Boiler
   
6. Applicable Regulation, Emission Limits, and Monitoring Requirements
   
   Applicable regulation citation: 40CFR64
   
   Pollutant: particulates
   
   Emission limit:
   
   Pollutant: 
   
   Emission limit:
   
   Pollutant: 
   
   Emission limit:
   
   Monitoring requirements:

7. Control Technology
   
   Brief description: Wet scrubber and multiclone

<table>
<thead>
<tr>
<th>Table 1. Monitoring Approach</th>
<th>Indicator No. 1</th>
<th>Indicator No. 2</th>
<th>Indicator No. 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Indicator Description</td>
<td>Wet scrubber pressure drop</td>
<td>Wet scrubber media flow rate</td>
<td></td>
</tr>
<tr>
<td>Measurement Approach</td>
<td>ID fan outlet pressure gauge</td>
<td>Flow meter at supply header</td>
<td></td>
</tr>
<tr>
<td>II. Indicator Range</td>
<td>0.5&quot; - 7.5&quot;</td>
<td>at least 350 gal/min</td>
<td></td>
</tr>
<tr>
<td>(Quality improvement plan threshold optional)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>III. Performance Criteria</td>
<td>Gauge marked at 0.5&quot; intervals'</td>
<td>Flow meter at supply header</td>
<td></td>
</tr>
<tr>
<td>A. Data Representativeness</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Verification of Operational Status</td>
<td>checked daily, maintained as needed</td>
<td>Manufacturer guarantees within 5%</td>
<td></td>
</tr>
<tr>
<td>C. QA/QC Practices and Criteria</td>
<td>calibrated annually, checked daily</td>
<td>Observed daily, maintained or replaced as needed</td>
<td></td>
</tr>
<tr>
<td>D. Monitoring Frequency</td>
<td>continually, recorded once per day</td>
<td>continually, recorded once per day</td>
<td></td>
</tr>
<tr>
<td>Data Collection Procedures</td>
<td>Data recorded in boiler operators log</td>
<td>Data recorded in boiler operators log</td>
<td></td>
</tr>
<tr>
<td>Averaging Period</td>
<td>Instantaneous (never to be exceeded)</td>
<td>Instantaneous, never to be outside range when boiler is operating</td>
<td></td>
</tr>
</tbody>
</table>

**Justification**

Present justification for selection of monitoring approach(es) and indicator range(s):

- Justification for Indicator 1: see IDEQ approval letter
- Justification for Indicator 2: see IDEQ approval letter
- Justification for Indicator 3:
Instructions for Form CAM

This form allows the applicant to submit their compliance assurance monitoring (CAM) plan to DEQ in accordance with 40 CFR 64.

1 – 4. Provide the same company name, facility name (if different), facility ID number, and brief project description as on Form CS. This is useful in case any pages of the application are separated.

Background
This section provides background information on the pollutant-specific emissions unit.

Item 5. Briefly describe the emissions unit and emissions point, and give the emission point identification number, if applicable.

Item 6. Cite the applicable regulation (emission limitation or standard[s]), list the pollutant(s) and emission limit(s), and, if applicable, briefly describe any existing monitoring requirements.

Item 7. Identify and briefly describe the emissions control technology for the unit.

Table 1. Monitoring Approach
In this section, you will describe the monitoring approach to be used. 40 CFR 64.3 specifies design criteria that the monitoring approach must address. The description of the monitoring approach must explain how the applicable design criteria, which are described in the following sections, will be satisfied.

When filling out Table 1, use as many indicator columns as needed. If you have more than three indicators, continue on an additional Form CAM.

I. Indicator Description
Describe each type of indicator. In the space for “Measurement Approach,” describe how the emissions are measured for each indicator.

According to 40 CFR 64.3(a)(1), monitoring must be designed to obtain data for one or more indicators of performance of the control device, any associated capture system, and processes necessary to assure compliance. Such indicators can include:

- a measured or predicted emissions level, such as total hydrocarbon concentration, nitrogen oxides (NOx) concentration, opacity, or visible emissions
- a pollution control device operating parameter, such as temperature or pressure drop
- a process operating parameter, such as temperature or flow
- a recordkeeping item, such as pounds of volatile organic compound per gallon of coating
- a work practice activity, such as records of solvent usage for cleaning activities
- recorded findings of inspection and maintenance activities, such as an internal fabric filter baghouse inspection, or
- a combination of these types of indicators

II. Indicator Range
Describe the indicator range. Providing the quality improvement plan threshold is optional.

According to 40 CFR 64.3(a)(2), monitoring must be based on establishing appropriate indicator ranges or designated conditions such that operation within the ranges provides a reasonable assurance of ongoing compliance with the applicable requirement over the anticipated range of operations. Reasonable assurance of compliance will be assessed by maintaining performance within the indicator range(s) or designated conditions that reflect proper operation and maintenance of the control device (and associated capture system). Except for a continuous emission monitoring system (CEMS), a predictive emission monitoring system (PEMS), and a continuous opacity monitoring system (COMS) that provide data in units of the applicable emissions standard, you must specify the range to be maintained for each monitored indicator.
According to 40 CFR 64.3(a)(3), the indicator range may be:

- a true range, comprised of upper and lower limits; (e.g., 3.5 to 5.0 in. w.c. for differential pressure)
- a single maximum or minimum value not to be exceeded (e.g., not less than 1650 °F for a thermal incinerator temperature)
- different values for different operating conditions (e.g., different ranges for high vs. low process load)
- expressed as a function of process variables (e.g., maintaining condenser temperatures "x" degrees below the condensation temperature of the applicable compounds being processed)
- expressed as maintaining the applicable indicator in a particular operational status (e.g., maintaining the position of a damper controlling gas flow to the atmosphere through a bypass duct)
- established as interdependent between more than one indicator

III. Performance Criteria

Monitoring approaches used to comply with 40 CFR 64 are subject to minimum performance criteria, which are specified in 40 CFR 64.3. The minimum criteria assure that the data generated by the monitoring approach provide valid and sufficient information on the actual conditions being monitored.

A. Data Representativeness

Describe the specifications that allow data to be obtained that are representative of the emissions or parameters being monitored (40 CFR 64.3(b)(1)).

Typically these specifications should include, as a minimum, a brief description of (a) detector location, (b) installation requirements (if applicable), and (c) minimum acceptable accuracy. For example, the specifications for a thermocouple used to measure thermal incinerator combustion chamber temperature could be as follows:

1. Detector location—exit of thermal incinerator combustion chamber.
2. Installation requirements—housed in a ceramic protection tube, shielded from flame.
3. Minimum acceptable accuracy—thermocouple sensor with a minimum accuracy of ±4 °F or ±0.75%, whichever is greater, and a data recording system with a minimum resolution of 20 °F.

B. Verification of Operational Status

Describe the verification procedures, including installation, calibration, and operation of the monitoring equipment, in accordance with manufacturer's recommendations, to confirm the operational status of the monitoring prior to the commencement of required monitoring.

For new or modified monitoring equipment, the monitoring approach must describe the verification procedures that will be used to confirm the operational status of the monitoring prior to the date by which the owner or operator must conduct monitoring (40 CFR 64.3(b)(2)).

C. Quality Assurance/Quality Control Practices and Criteria

Describe quality assurance/quality control (QA/QC) practices to ensure continuing validity of data (40 CFR 64.3(b)(3)).

QC activities are those routine activities included as a part of normal internal procedures such as periodic calibration checks (e.g., zero check of manometer), visual inspections by operating staff, routine maintenance activities (e.g., replacement of filters on COMS purge air system, weekly blowback purge of manometer lines), or training/certification of staff.

QA activities are those activities that are performed on a less frequent basis, typically by someone other than the person(s) responsible for the normal routine operations. An example
of a QA activity is quarterly or annual calibration verification/adjustments performed by an instrument technician.

In developing minimum QA/QC activities for monitoring equipment and instruments, the owner or operator should take into account the calibration and maintenance requirements or recommendations specified by the instrument manufacturer or supplier. When establishing QA/QC activities, the desired precision and accuracy of the data should be considered; e.g., if greater inaccuracy can be tolerated for the application (i.e., ±20 °F rather than ±2 °F), less frequent calibrations and/or less stringent acceptance criteria may be necessary.

Include a list of the primary QA/QC activities; their frequency; and, where appropriate, the acceptable limits. For example, for a thermocouple, the QA/QC activities could be specified as follows:

1. Visual inspection of thermocouple sensor and well (semiannually).
2. Measurement of system accuracy using a thermocouple simulator (calibrated millivolt source) at the sensor terminal location (semiannually); specified accuracy limit of ±40 °F at 1800 °F.

D. Monitoring Frequency, Data Collection Procedures, Averaging Period

Describe the monitoring frequency, data collection, and if applicable, averaging periods for discrete data points to be used in determining whether an excursion or exceedance has occurred.

The monitoring and data collection frequency (including associated averaging periods) must be designed to obtain data at such intervals that are, as a minimum, consistent with the time period over which an excursion is likely to occur based on the characteristics and typical variability of the emissions unit (including the control device and associated capture system).

Monitoring Frequency

Specify the monitoring frequency (how often measurements will be taken and recorded). Emissions units with postcontrol PTE ≥ 100% of the amount classifying the source as a major source must collect four or more values per hour to be averaged. Other emissions units must collect data at least once per 24 hour period (40 CFR 64.3(b)(4)).

Examples of monitoring frequency include (a) incinerator temperature at 1-minute intervals, (b) NOx and oxygen (O2) concentration at 15-minute intervals, (c) differential pressure at 1-hr intervals, and (d) opacity observations for 15 contiguous minutes per day. Where the measurement frequency and the recording frequency differ, both should be specified.

Data Collection Procedures

Describe the data collection procedures (e.g., manual readings and data logging or use of a data acquisition system), which should indicate the equipment or method and the frequency at which indicator values are to be recorded. Examples of data acquisition procedures include (a) 24-hour circular chart—incinerator temperature at 1-minute intervals, (b) electronic data file via data acquisition system—incinerator temperature at 1-minute intervals, (c) electronic data file via data acquisition system—15-minute average NOx and O2 CEMS measurements, (d) written entry on log sheet—hourly differential pressure, and (e) completion of Reference Method 9 visible emission data form—daily opacity observations.

Averaging Period

Specify the data averaging period (if applicable) for each parameter. If the proposed parameter indicator will be an average value, you must clearly specify the averaging period that will be used to determine that the indicator range is maintained. For example, “The NOx analyzer will measure the concentration at 10-second intervals, and the average value for each 15-minute period will be recorded. The 15-minute values for each clock-hour will be averaged to provide a 1-hour NOx concentration to assess compliance with the indicator range.” For monitoring an operating parameter, “The thermocouple will measure thermal incinerator combustion chamber temperature at 1-minute intervals, and the average value for
each 1-hour period will be recorded. The 1-hour values will be averaged over each 3-hour period to provide a 3-hour temperature to assess compliance with the indicator range.”

**Justification**

Please include a justification for the selection of monitoring approach and indicator range(s).

The justification should briefly describe how the selected monitoring approach and performance indicator ranges are adequate to:

1. Demonstrate that the control device and processes significant to achieving compliance are operated and maintained in accordance with good air pollution practices that will minimize emissions at least to levels required by all applicable requirements; and
2. Provide reasonable assurance of compliance with emission limitations for the anticipated range of operations.

To support the justification the owner/operator may rely on:

- facility or corporate experience with monitoring control device or process operation performance
- generally available sources of information (e.g., air pollution engineering manuals, EPA and permitting authority publications on monitoring, operation, and maintenance of pollution control devices), or
- regulatory precedents, such as the following:
  - presumptively acceptable or required monitoring approaches established by the permitting authority to achieve compliance with the CAM rule for the particular pollutant specific emissions unit
  - continuous emission, opacity, or predictive emission monitoring systems that satisfy applicable monitoring requirements and performance specifications as specified in 40 CFR 64
  - alternative monitoring methods allowed or approved pursuant to 40 CFR 75
  - monitoring included for standards exempt from CAM
  - monitoring requirements established in other regulations for the same or similar type sources (e.g., a monitoring requirement in an NSPS)

The justification for the selected indicator range(s) should include a summary (tabular or graphical format) of the data supporting the selected ranges, supplemented by engineering assessments or control device manufacturer’s recommendations, if necessary. References for the appropriate compliance test report(s) also should be provided. If site-specific compliance data are not available, the documentation must include a test plan and schedule for obtaining such data. The test plan should identify the following:

1. Pollutants to be measured and the compliance test methods to be used.
2. Number and duration of test runs to be conducted.
3. Proposed process operating conditions during the tests (e.g., percent of full load).
4. Proposed control device operating conditions and indicator ranges (e.g., venturi pressure drop, condenser temperature).
5. Process and control device parameters to be monitored during the test and reported.
6. Whether indicator data will be collected over an extended time period and the process/control device data will be collected concurrently.

As an alternative to providing a compliance test plan, the owner/operator may propose other information as the basis for the indicator ranges proposed. However, in such cases, the documentation provided must demonstrate to DEQ’s satisfaction that compliance testing is unnecessary to establish indicator ranges at levels that satisfy 40 CFR 64 criteria.
Other information that the owner/operator may consider in selecting operator ranges, in lieu of compliance test data, in order of preference includes:

- site-specific data from tests other than compliance tests
- data from tests performed on similar units at the facility or similar facilities
- empirical information concerning the assessment of control technology performance (e.g., empirical performance information from a scrubber control technology handbook)
- regulatory precedents involving appropriate monitoring of similar emissions units (e.g., NSPS requirement for same control technology at a similar source)
- theoretical considerations based on generally accepted engineering practices (i.e., engineering judgment)

If the owner/operator bases the indicator ranges on any of the other types of available information listed above rather than on site-specific compliance test data, the documentation must include a concise explanation of the rationale for relying on information other than site-specific compliance data. The rationale must demonstrate that compliance testing is not necessary for the owner/operator to establish operating ranges so that excursions from the operating ranges can be addressed prior to potential emission exceedances. Factors to consider in the rationale for using information other than compliance test data include the ability to establish the appropriate operating ranges based upon engineering principles, and conservative assumptions with respect to the emissions variability and the margin of compliance associated with the emissions unit and control device.

Additional Information

Evaluation Factors
Site-specific factors should be considered in designing monitoring to meet 40 CFR 64.3(a) and (b). These factors include applicability of existing monitoring procedures, ability of monitoring to account for process and control device operational variability, reliability and latitude built into control technology, and level of actual emissions compared to compliance limitation (40 CFR 64.3(c)).

Special Criteria for Use of CEMS, PEMS, or COMS

40 CFR 64.3(d)(1)
CEMS, PEMS, or COMS that are required by other authorities under the Clean Air Act, State, or local law must be used to satisfy the CAM rule.

40 CFR 64.3(d)(2)
CEMS, PEMS, or COMS that satisfy any of the following monitoring requirements are deemed to satisfy the general design and performance criteria:

- § 51.214 and Appendix P of 40 CFR 51
- § 60.13 and Appendix B of 40 CFR 60
- § 63.8 and applicable performance specifications of the applicable subpart of 40 CFR 63
- 40 CFR 75
- subpart H and Appendix IX of 40 CFR 266
- or comparable requirements established by the permitting authority

40 CFR 64.3(d)(3)
Monitoring must allow for reporting of exceedances (or excursions) consistent with any underlying requirement or with 40 CFR 64.3(b)(4), and provide an indicator range consistent with 40 CFR 64.3(a) for a COMS used to assure compliance with a PM standard.

For More Information
Appendix B

Equipment List

From our current Tier 1 air permit,

Table 2.1. Regulated Source

<table>
<thead>
<tr>
<th>Permit Section</th>
<th>Source Description</th>
<th>Emissions Control(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Zurn Industries hog-fuel boiler: Type C, rated at 60,000 pound per hour saturated steam; installed 1978</td>
<td>Zurn Industries multiclone followed by Zurn wet scrubber</td>
</tr>
<tr>
<td>5</td>
<td>Dry kilns No. 1 and No. 2: Manufacturer: Moore Length: 73 feet Design: Double track Installed June 1972 and June 1964</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Dry Kiln No. 3: Manufacturer: Lumber systems Inc Length: 73 feet Design: Single track Installed: March 1984</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dry Kilns No. 4, No. 5, and No. 6: Manufacturer: Lumber systems Inc Length: 73 feet Design: Double track Installed: June 1977, June 1977, and January 1989, respectively</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Woodworking Equipment</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Emergency compression ignition engine Manufacturer: John Deere Model: 6081AF001 Rated Capacity: 270 hp</td>
<td>None</td>
</tr>
</tbody>
</table>

No changes in equipment are proposed with this permit renewal.
Table 9.1 INsignificant Activities

Table 9.1 of the current permit lists the units or activities that are insignificant based on size or production rate, copied from the current Tier 1 permit. No changes are proposed with this renewal.

<table>
<thead>
<tr>
<th>Truck bark bin</th>
<th>Truck sawdust bin</th>
<th>Truck chip bin</th>
<th>Boiler fuel storage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auxiliary fuel bin</td>
<td>Shavings truck bin</td>
<td>Log yard waste 1</td>
<td>Log yard waste 2</td>
</tr>
<tr>
<td>Rock storage</td>
<td>Ash storage</td>
<td>Hog fuel in-feed conveyor</td>
<td>Bark conveyor system</td>
</tr>
<tr>
<td>Hog fuel out-feed conveyor</td>
<td>Bark screen oversize</td>
<td>Deck trash conveyor</td>
<td>Truck bark bin conveyor</td>
</tr>
<tr>
<td>Boiler bark conveyor</td>
<td>Sawdust conveyor-vibrator</td>
<td>Chip oversize conveyor</td>
<td>Main fuel conveyor</td>
</tr>
<tr>
<td>Auxiliary fuel bin conveyor</td>
<td>Fly-ash transport</td>
<td>Small log de-barker</td>
<td>Large log de-barker</td>
</tr>
<tr>
<td>Bark hog</td>
<td>Bark screen</td>
<td>Chip screen</td>
<td>20,000-gallon diesel fuel tank 1</td>
</tr>
<tr>
<td>2,000-gallon gasoline tank</td>
<td>2,500-gallon diesel fuel tank</td>
<td>1,000-gallon stove oil tank</td>
<td>20,000-gallon diesel fuel tank 2</td>
</tr>
<tr>
<td>30-gallon parts washer 1</td>
<td>30-gallon parts washer 2</td>
<td>30-gallon parts washer 3</td>
<td>2,000-gallon aviation fuel tank</td>
</tr>
<tr>
<td>1,000-gallon used oil tank</td>
<td>2,000 cubic yard rock storage</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Tier I Operating Permit Application Completeness Checklist

This checklist is designed to aid the applicant in submitting a complete Tier I permit application. In addition to the items in this checklist, information requested by DEQ during review of the application should be provided in accordance with IDAPA 58.01.01.314.12 and IDAPA 58.01.01.315.

Information on where to find each required component is shown in italics in line with the completeness requirements below.

1. **General Facility Information**
   Complete and sign the Tier I Application and General Information Cover Sheet (Form GI)
   Completed, signed GI form is in Appendix A. This application proposes a renewal of the facility’s current Title V air permit with no changes in proposed emission sources or throughput.

2. **Applicable Equipment-Specific Application Forms**
   Complete all applicable equipment-specific applications forms. For all forms listed below, please visit DEQ’s website at [WEBSITE].
   - **Control Devices**
     - Form AO (Afterburner/Oxidizer)
     - Form CA (Carbon Absorber)
     - Form CYS (Cyclone Separator)
     - Form ESP (Electrostatic Precipitator)
     - Form BCE (Baghouse Control Equipment)
     - Form SCE (Scrubber Control Equipment)
   
   *multiple forms CYS and one form SCE are applicable and included in Appendix A*

   - **Industrial Category Specific**
     - Form EU2 (Nonmetallic Mineral Processing Plant – fugitive dust only)
     - Form HMAP (Hot-mix Asphalt Plant)
     - Form CBP (Concrete Batch Plant)

   *N/A*

   - **Emissions Unit Specific**
     - Form EU0 (General Emissions Unit)
     - Form EU1 (Industrial Engine)
     - Form EU3 (Spray Paint Booth)
     - Form EU4 (Cooling Towers)
     - Form EU5 (Boilers)
   
   *multiple forms EU0 and form EU5 are applicable, and can be fund in Appendix A*

   - **Compliance Assurance Monitoring**
     - Form CAM (Compliance Assurance Monitoring). Refer to 40 CFR 64
   
   *Form CAM is included in Appendix A. CAM details remain unchanged from Table 4.3 of the facilities current Title V air permit.*

   - **Emissions Inventory**
     - Forms EI (Emissions Inventory Requirements & Forms)
   
   *All information required on form EI and more is included in the PTE calculations in Appendix D*

   - **Other Applicability Forms**
     - Form FRA (Federal Requirements Applicability)
   
   *Form FRA is included in Appendix A. Significantly more detail on applicability of federal regulations is included in Appendix E*

3. **Additional Required Information not Cover by Equipment-Specific Forms**
   For equipment that is not covered by any of the above equipment-specific forms, the following applicable data are required.
Tier I Operating Permit Application
Completeness Checklist

- Plot Plan - Equipment Location Drawing - Equipment Description - Fuel and Burners Used
- Operating Schedule - Process Description - Process Flow Diagram - Process Rate
- Material Safety Data Sheets (MSDS) - Other data needed to process application

A facility plot plan, equipment location are documented in the application base document

4. **Applicable Requirements**
   Cite and describe all applicable requirements affecting each emissions unit. Describe or reference all methods required by each applicable requirement for determining the compliance status of the emissions unit with the applicable requirement, including any applicable monitoring, recordkeeping and reporting requirements or test methods.

   Appendix E describes in detail the applicable federal regulations and their requirements. There are no changes in proposed equipment or operation from the facility's current permit

5. **Obsolete Permit Conditions**
   Review all existing permit conditions or past requirements that had either been completed prior to issuance of the Tier I operating permit or were required by the Tier I operating permit to have been completed before the Tier I operation.

   None were identified

6. **Proposed Determination of Non-Applicability**
   Identify requirements for which the applicant seeks a determination of non-applicability and provide an explanation of why the requirement is not applicable to the Tier I source.

   N/A

7. **Alternative Operating Scenarios**
   Identify all requested alternative operating scenarios. Provide a detailed description of all requested alternative operating scenarios. Include all the information required by Section 314 that is relevant to the alternative operating scenario.

   N/A

8. **Compliance Certifications**
   Provide a compliance certification regarding the compliance status of each emissions unit at the time the application is submitted.

   - Identifies all applicable requirements affecting each emissions unit.
   - Certifies the compliance status of each emissions unit with each of the applicable requirements.
   - Provides a detailed description of the method(s) used for determining the compliance status of each emissions unit with each applicable requirement, including a description of any monitoring, recordkeeping, reporting and test methods that were used. Also provide a detailed description of the method(s) required for determining compliance.
   - Certifies the compliance status of the emissions unit with any applicable enhanced monitoring requirements.
   - Certifies the compliance status of the emissions unit with any applicable enhanced compliance certification requirements.
   - Provides all other information necessary to determining the compliance status of the emissions unit.
   - Provide a schedule for submission of compliance certifications during the term of the Tier I operating permit. The schedule shall require compliance certifications to be submitted no less frequently than annually or more frequently if specified by the underlying applicable requirement or by the DEQ.

   Appendix F provides the required compliance certification via IDEQs AQ-C2 form

9. **Compliance Plans**
   Provide a compliance description as follows:

   - For each applicable requirement with which the emissions unit is in compliance, state that the emissions unit will continue to comply with the applicable requirement.
**Tier I Operating Permit Application Completeness Checklist**

- For each applicable requirement that will become effective during the term of the Tier I operating permit that does not contain a more detailed schedule, state that the emissions unit will meet the applicable requirement on a timely basis.
- For each applicable requirement that will become effective during the term of the Tier I operating permit that contains a more detailed schedule, state that the emissions unit will comply with the applicable requirement on the schedule provided in the applicable requirement.
- For each applicable requirement with which the emission unit is not in compliance, state that the emissions unit will be in compliance with the applicable requirement by the time the Tier I operating permit is issued or provide a compliance schedule in accordance with Subsection 314.10.b.

The facility proposes no changes in allowable operations or throughput from that currently permitted. Appendix F provides certification that the facility is in compliance, as do all previous annual compliance certifications.

10. **Compliance Schedules**
   All compliance schedules shall:
   - Include a schedule of remedial measures leading to compliance, including an enforceable sequence of actions and specific dates for achieving milestones and achieving compliance.
   - Incorporate the terms and conditions of any applicable consent order, judicial order, judicial consent decree, administrative order, settlement agreement or judgment.
   - Be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
   - Provide a schedule for submission to the DEQ of periodic progress reports no less frequently than every six (6) months or at a more frequent period if one (1) is specified in the underlying applicable requirement or by the DEQ.

N/A

11. **Trading Scenarios**
   Identify all requested trading scenarios, including alternative emissions limits (bubbles) authorized by Section 440. Provide a detailed description of all requested trading scenarios. Include all the information required by Section 314 and enforce.

N/A

12. **Insignificant Activities Based on Size or Production Rate**
   Provide a list of units or activities that are insignificant on the basis of size or production rate. Refer to IDAPA 58.01.01.317.01.b and 40 CFR 70.5(c).
   The list, consistent with IDEQ's determination for the facility's current air permit, is included in Appendix B.

13. **Acid Rain Program Requirements**
   For any affected units subject to the Acid Rain Program pursuant to 40 CFR 72.6, submit an Acid Rain Permit Application in accordance with 40 CFR 72, Subpart C.

N/A

14. **Permit Shield Request**
   A Tier I operating permit with a permit shield will identify rules that do not apply, and state that compliance with all conditions of the permit will be considered as compliance with all regulatory requirements in effect as of the date of permit issuance. A requirement identified in the permit as non-applicable is not enforceable by EPA, DEQ, or citizens. If a permit shield is being sought, describe the regulatory requirement that the facility is requesting a shield for and cite the rule reference and date of the rule version (e.g. IDAPA 58.01.01.860, 04/05/2000); explain the reason(s) for requesting a permit shield for each regulatory requirement; and indicate the length of time over which the permit shield should last.

15. **Documents for Public Comment**
Tier I Operating Permit Application Completeness Checklist

Copies of all compliance documents required by a Tier I operating permit, including but not limited to quality assurance plans, dust management plans, and operation and maintenance manuals, are to be included in the permit application for review during the public comment period.

All required documents have been submitted to IDEQ and are on file. Additional copies can be provided if needed

16. Certification of Documents
All documents, including but not limited to, application forms for permits to construct, application forms for operating permits, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports or compliance certifications submitted to the DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Refer to IDAPA 58.01.01.123.

The signed IDEQ Form GI includes a certification covering all materials provided with this Title V air permit renewal application package

17. DEQ Mailing Address
Submit the certified Tier I operating permit application to the following address:

Department of Environmental Quality
Air Quality Division
Stationary Source Program Office
1410 North Hilton
Boise, ID 83706-1255
**Acronyms**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM</td>
<td>million</td>
</tr>
<tr>
<td>M</td>
<td>thousamd</td>
</tr>
<tr>
<td>MMbf/hr</td>
<td>million board feet (lumber scale) per hour</td>
</tr>
<tr>
<td>MMBtu/hr</td>
<td>Million Btu (B. Thermal Unit) per hour</td>
</tr>
<tr>
<td>MM lb steam</td>
<td>million lbs steam</td>
</tr>
<tr>
<td>BDT</td>
<td>bone dry tons</td>
</tr>
<tr>
<td>GT</td>
<td>green tons</td>
</tr>
<tr>
<td>hr</td>
<td>hour</td>
</tr>
<tr>
<td>yr</td>
<td>year</td>
</tr>
<tr>
<td>ST</td>
<td>used as an abbreviation for Storage source emissions, where necessary</td>
</tr>
<tr>
<td>TR</td>
<td>used as an abbreviation for Transfer source emissions, where necessary</td>
</tr>
<tr>
<td>HAP</td>
<td>Hazardous air pollutant</td>
</tr>
<tr>
<td>NAAQS</td>
<td>National Ambient Air Quality Standard</td>
</tr>
<tr>
<td>IDEQ</td>
<td>Idaho Department of Environmental Quality</td>
</tr>
</tbody>
</table>
## Transfer/Conveyor Calculations

### Conveyors

<table>
<thead>
<tr>
<th>Name</th>
<th>Code</th>
<th>Wind Spd (MPH)</th>
<th>Moisture (%)</th>
<th>Max Transf Rate (BDT/hr)</th>
<th>Max Throughput (BDT tons/yr)</th>
<th>Emission Factor *</th>
<th>Max PM Emissons (lb/hr)</th>
<th>Avg. PM Emissons (lb/hr)</th>
<th>PM 10 PM Emissons (lb/hr)</th>
<th>Avg. PM 10 PM Emissons (lb/hr)</th>
<th>PM 10 Operating Efficiency</th>
<th>Avg. PM 10 PM Operating Efficiency</th>
<th>PM 10 Operating Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hog Infeed Conveyor</td>
<td>TR 1</td>
<td>9</td>
<td>43</td>
<td>7.63</td>
<td>38,132</td>
<td>0.05910</td>
<td>0.45</td>
<td>0.38</td>
<td>1.13</td>
<td>0.16</td>
<td>0.13</td>
<td>0.39</td>
<td>6,000</td>
</tr>
<tr>
<td>Bark Conveyor System</td>
<td>TR 2</td>
<td>9</td>
<td>43</td>
<td>4.60</td>
<td>1,733</td>
<td>0.05910</td>
<td>0.27</td>
<td>0.23</td>
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<td>0.10</td>
<td>0.08</td>
<td>0.02</td>
<td>452</td>
</tr>
<tr>
<td>Hog Outfeed Conveyor</td>
<td>TR 3</td>
<td>9</td>
<td>43</td>
<td>7.63</td>
<td>38,132</td>
<td>0.05910</td>
<td>0.45</td>
<td>0.38</td>
<td>1.13</td>
<td>0.16</td>
<td>0.13</td>
<td>0.39</td>
<td>6,000</td>
</tr>
<tr>
<td>Bark Screen Overs Conveyor</td>
<td>TR 4</td>
<td>9</td>
<td>43</td>
<td>0.69</td>
<td>3,457</td>
<td>0.05910</td>
<td>0.04</td>
<td>0.03</td>
<td>0.10</td>
<td>0.01</td>
<td>0.01</td>
<td>0.04</td>
<td>6,000</td>
</tr>
<tr>
<td>Deck Trash Conveyor</td>
<td>TR 5</td>
<td>9</td>
<td>45</td>
<td>0.36</td>
<td>1,800</td>
<td>0.04785</td>
<td>0.02</td>
<td>0.01</td>
<td>0.04</td>
<td>0.01</td>
<td>0.02</td>
<td>0.02</td>
<td>6,000</td>
</tr>
<tr>
<td>Truck Bark Bin Conveyor</td>
<td>TR 6</td>
<td>9</td>
<td>43</td>
<td>6.94</td>
<td>34,675</td>
<td>0.05910</td>
<td>0.41</td>
<td>0.34</td>
<td>1.02</td>
<td>0.14</td>
<td>0.12</td>
<td>0.36</td>
<td>6,000</td>
</tr>
<tr>
<td>Boiler Bark Conveyor</td>
<td>TR 7</td>
<td>9</td>
<td>43</td>
<td>5.54</td>
<td>27,675</td>
<td>0.05910</td>
<td>0.33</td>
<td>0.27</td>
<td>0.82</td>
<td>0.11</td>
<td>0.10</td>
<td>0.29</td>
<td>6,000</td>
</tr>
<tr>
<td>Sawdust Conveyor</td>
<td>TR 8</td>
<td>9</td>
<td>43</td>
<td>4.65</td>
<td>23,240</td>
<td>0.05218</td>
<td>0.24</td>
<td>0.20</td>
<td>0.61</td>
<td>0.08</td>
<td>0.07</td>
<td>0.21</td>
<td>6,000</td>
</tr>
<tr>
<td>Chips Overs/fines Conveyor</td>
<td>TR 9</td>
<td>9</td>
<td>43</td>
<td>0.65</td>
<td>3,262</td>
<td>0.05218</td>
<td>0.03</td>
<td>0.03</td>
<td>0.09</td>
<td>0.01</td>
<td>0.01</td>
<td>0.03</td>
<td>6,000</td>
</tr>
<tr>
<td>Main Fuel Conveyor</td>
<td>TR 10</td>
<td>9</td>
<td>43</td>
<td>4.20</td>
<td>29,981</td>
<td>0.05910</td>
<td>0.25</td>
<td>0.21</td>
<td>0.89</td>
<td>0.09</td>
<td>0.07</td>
<td>0.31</td>
<td>8,568</td>
</tr>
<tr>
<td>Aux Fuel Conveyor</td>
<td>TR 11</td>
<td>9</td>
<td>43</td>
<td>2.40</td>
<td>6,321</td>
<td>0.05910</td>
<td>0.05</td>
<td>0.04</td>
<td>0.19</td>
<td>0.02</td>
<td>0.02</td>
<td>0.07</td>
<td>8,568</td>
</tr>
</tbody>
</table>

*Use AP 42 13.2.4 Aggregate Handling

\[ E = k \times \left(\frac{0.0032}{(\text{u}/5)^{1.3}}/\text{M/2}^{1.4}\right) \]

Particulate matter multiplier \((k)\) = 0.35 for PM 10

Average wind speed = 9 mph

at 50% moisture content

- PM 10 EF = 0.0167 lbs/ton
- PM 10 EF = 0.0183 lbs/ton
- PM 10 EF = 0.0207 lbs/ton
- PM 10 EF = 0.0177 lbs/ton
- PM 10 EF = 0.4207 lbs/ton

at 47% moisture content

- PM 10 EF = 0.0479 lbs/ton
- PM 10 EF = 0.0522 lbs/ton
- PM 10 EF = 0.0591 lbs/ton
- PM 10 EF = 0.3935 lbs/ton
- PM 10 EF = 1.2020 lbs/ton

at 11.1% moisture content

- PM 10 EF = 0.0167 lbs/ton (planer shavings)
- PM 10 EF = 0.3935 lbs/ton
- PM 10 EF = 1.2020 lbs/ton

at 5% moisture content

- PM 10 EF = 0.0167 lbs/ton
- PM 10 EF = 0.3935 lbs/ton
- PM 10 EF = 1.2020 lbs/ton

### Bin to Truck Transfers

<table>
<thead>
<tr>
<th>Name</th>
<th>Code</th>
<th>Em. F (lb/ton)</th>
<th>Em. F (lb/ton)</th>
<th>Throughput (BDT)</th>
<th>Transfer Rate (BDT/hr)</th>
<th>Control Efficiency</th>
<th>Emissions (tons/yr)</th>
<th>Emissions (tons/yr)</th>
<th>Moisture Content</th>
<th>Operating Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bark Bin to truck</td>
<td>TR 13</td>
<td>0.0591</td>
<td>0.0207</td>
<td>7,000</td>
<td>0.8</td>
<td>75%</td>
<td>0.05</td>
<td>0.02</td>
<td>47%</td>
<td>8,568</td>
</tr>
<tr>
<td>Sawdust Bin to truck</td>
<td>TR 14</td>
<td>0.0591</td>
<td>0.0207</td>
<td>21,240</td>
<td>2.5</td>
<td>50%</td>
<td>0.31</td>
<td>0.11</td>
<td>47%</td>
<td>8,568</td>
</tr>
<tr>
<td>Chips bins to truck</td>
<td>TR 15</td>
<td>0.3935</td>
<td>0.1377</td>
<td>65,600</td>
<td>7.7</td>
<td>75%</td>
<td>0.48</td>
<td>0.17</td>
<td>47%</td>
<td>8,568</td>
</tr>
<tr>
<td>Shavings to Truck</td>
<td>TR 16</td>
<td>0.0591</td>
<td>0.0207</td>
<td>23,500</td>
<td>2.7</td>
<td>75%</td>
<td>1.16</td>
<td>0.40</td>
<td>11%</td>
<td>8,568</td>
</tr>
<tr>
<td>Fuel Reload to Truck</td>
<td>TR 17</td>
<td>0.0591</td>
<td>0.0207</td>
<td>4,581</td>
<td>0.5</td>
<td>75%</td>
<td>0.14</td>
<td>0.05</td>
<td>47%</td>
<td>8,568</td>
</tr>
</tbody>
</table>

Total Emissions

- PM 10 EF = 2.14 lbs/hr
- PM 10 EF = 0.75 lbs/hr
- PM 10 EF = 0.17 lbs/hr

Note: TR 13 - 16 all have long sidewalls, allowing 75% control for sawdust, 90% controls for larger materials

Note: TR 12 is ash moving - very small amount - negligible emissions.
### Storage Calculations

#### PILES

<table>
<thead>
<tr>
<th>Name</th>
<th>Code</th>
<th>Width (Ft.)</th>
<th>Length (Ft.)</th>
<th>Height (Ft.)</th>
<th>Area Acres</th>
<th>Area lb/acre/day Factor *</th>
<th>Area lb/acre/day PM 10 Factor *</th>
<th>PM tons/yr</th>
<th>PM 10 tons/yr</th>
<th>Assumptions</th>
<th>Modeled as</th>
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<tr>
<td>Boiler Fuel Storage</td>
<td>ST 4</td>
<td>50</td>
<td>75</td>
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<td>0.09</td>
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<td>0.15</td>
<td>0.020</td>
<td>0.07</td>
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<tr>
<td>Log Yard Waste #1</td>
<td>ST 7</td>
<td>20</td>
<td>40</td>
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<td>9.35</td>
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<td>0.004</td>
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<td>0.00</td>
<td>0.000</td>
<td>0.00</td>
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#### BINS

<table>
<thead>
<tr>
<th>Name</th>
<th>Code</th>
<th>Thput (tons/yr)</th>
<th>E. Fact (lb/t)</th>
<th>PM Efficiency</th>
<th>PM-10 Control Efficiency</th>
<th>Max Trans (tons/hr)</th>
<th>Avg Trans (tons/hr)</th>
<th>Operat. Hrs/yr</th>
<th>120%PM max (lb/hr)</th>
<th>120%PM-10 max (lbs/hr)</th>
<th>Modeled as</th>
</tr>
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<tbody>
<tr>
<td>Truck Bark Bin</td>
<td>ST 1</td>
<td>7,000</td>
<td>1.0</td>
<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>50</td>
<td>25</td>
<td>8,568</td>
<td>0.0</td>
<td>0.175</td>
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<tr>
<td>Sawdust Bin</td>
<td>ST 2</td>
<td>21,240</td>
<td>1.0</td>
<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>50</td>
<td>25</td>
<td>8,568</td>
<td>0.1</td>
<td>0.531</td>
</tr>
<tr>
<td>Truck Chip Bin</td>
<td>ST 3</td>
<td>65,600</td>
<td>1.0</td>
<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>75</td>
<td>50</td>
<td>8,568</td>
<td>0.5</td>
<td>1.640</td>
</tr>
<tr>
<td>Aux Fuel Bin</td>
<td>ST 5</td>
<td>6,321</td>
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<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>75</td>
<td>50</td>
<td>8,568</td>
<td>0.5</td>
<td>1.640</td>
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<tr>
<td>Shavings Truck Bin</td>
<td>ST 6</td>
<td>23,500</td>
<td>1.0</td>
<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>50</td>
<td>25</td>
<td>8,568</td>
<td>0.1</td>
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<tr>
<td><strong>Total</strong></td>
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<td>85,000</td>
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<td>0.58</td>
<td>BDT</td>
<td>95%</td>
<td>75</td>
<td>50</td>
<td>8,568</td>
<td>0.5</td>
<td>1.640</td>
</tr>
</tbody>
</table>

Note: All storage bins are enclosed, with small vent openings for air, (assume 95% effic).  
Total: 0.30 0.16 0.8 3.1 0.5 1.8
# Solvent Calculations

<table>
<thead>
<tr>
<th>Name</th>
<th>Code</th>
<th>Throughput (gallons)</th>
<th>E. Factor (lb/1000 gal)</th>
<th>HAPs (tons/yr)</th>
<th>VOC's (tons/yr)</th>
<th>Remarks</th>
<th>Total HAPs</th>
<th>Total VOC's</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diesel Tank 1</td>
<td>S 1</td>
<td>175,000</td>
<td>0.02</td>
<td>0.00E+00</td>
<td>1.8E-03</td>
<td>No Haps</td>
<td>139413</td>
<td></td>
</tr>
<tr>
<td>Diesel Tank 2</td>
<td>S 2</td>
<td>175,000</td>
<td>0.02</td>
<td>0.00E+00</td>
<td>1.8E-03</td>
<td>No Haps</td>
<td>139412</td>
<td></td>
</tr>
<tr>
<td>Gasoline Tank</td>
<td>S 3</td>
<td>30,000</td>
<td>8.2</td>
<td>7.71E-02</td>
<td>1.2E-01</td>
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<td>23400</td>
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</tr>
<tr>
<td>#1 Diesel Tank</td>
<td>S 4</td>
<td>900</td>
<td>0.02</td>
<td>5.76E-06</td>
<td>9.0E-06</td>
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<td>600</td>
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<tr>
<td>Stove Oil Tank</td>
<td>S 5</td>
<td>11,000</td>
<td>0.02</td>
<td>7.04E-05</td>
<td>1.1E-04</td>
<td></td>
<td>9677</td>
<td></td>
</tr>
<tr>
<td>Parts Washer</td>
<td>S 6</td>
<td>tons/yr/unit:</td>
<td>0.330</td>
<td>1.72E-04</td>
<td>1.7E-02</td>
<td>assume 95% efficiency-closed lid, 1 unit.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parts Washer</td>
<td>S 7</td>
<td>tons/yr/unit:</td>
<td>0.330</td>
<td>1.72E-04</td>
<td>1.7E-02</td>
<td>assume 95% efficiency-closed lid, 1 unit.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parts Washer</td>
<td>S 8</td>
<td>tons/yr/unit:</td>
<td>0.330</td>
<td>1.72E-04</td>
<td>1.7E-02</td>
<td>assume 95% efficiency-closed lid, 1 unit.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aviation Gas</td>
<td>S 9</td>
<td>2,500</td>
<td>0.03</td>
<td>0.00E+00</td>
<td>3.8E-05</td>
<td>No Haps</td>
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<tr>
<td>Used Oil Tank</td>
<td>S 10</td>
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<td>Insig Activity</td>
<td>Insig Activity</td>
<td>0.0E+00</td>
<td>insignificant activity</td>
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</table>

Total: 0.08 0.18

*Assume HAPS emissions are directly proportional to % by weight.
Boiler Potential Emissions - Bennett Lumber

47,837 G Tons/yr = 444,728 mmBTU/yr

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor</th>
<th>Oper. Units</th>
<th>Emissions (tons/yr)</th>
<th>Max lbs/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>* Particulate</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>PM 10</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>PM 2.5</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>** SO 2</td>
<td>0.025 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>7.98</td>
<td>2.41</td>
</tr>
<tr>
<td>** CO</td>
<td>0.60 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>249.00</td>
<td></td>
</tr>
<tr>
<td>** NOx</td>
<td>0.22 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>70.22</td>
<td>21.24</td>
</tr>
<tr>
<td>** VOC</td>
<td>0.038 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>12.13</td>
<td>3.67</td>
</tr>
<tr>
<td>Carbon Dioxide (CO$_2$)</td>
<td>206.8 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>66007.32</td>
<td></td>
</tr>
<tr>
<td>Methane (CH$_4$)</td>
<td>1.5 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>478.78</td>
<td></td>
</tr>
<tr>
<td>Nitrous Oxide (N$_2$O)</td>
<td>2.9 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>925.63</td>
<td></td>
</tr>
<tr>
<td>CO2 eq</td>
<td>211.2 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>67411.73</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor</th>
<th>Oper. Units</th>
<th>Emissions (tons/yr)</th>
<th>Max lbs/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>* Particulate</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>PM 10</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>PM 2.5</td>
<td>27.00 lb/hr</td>
<td>8,760 hrs</td>
<td>99.48</td>
<td>27.00</td>
</tr>
<tr>
<td>** SO 2</td>
<td>0.025 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>7.98</td>
<td>2.41</td>
</tr>
<tr>
<td>** CO</td>
<td>0.60 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>249.00</td>
<td></td>
</tr>
<tr>
<td>** NOx</td>
<td>0.22 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>70.22</td>
<td>21.24</td>
</tr>
<tr>
<td>** VOC</td>
<td>0.038 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>12.13</td>
<td>3.67</td>
</tr>
<tr>
<td>Carbon Dioxide (CO$_2$)</td>
<td>206.8 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>66007.32</td>
<td></td>
</tr>
<tr>
<td>Methane (CH$_4$)</td>
<td>1.5 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>478.78</td>
<td></td>
</tr>
<tr>
<td>Nitrous Oxide (N$_2$O)</td>
<td>2.9 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>925.63</td>
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</tr>
<tr>
<td>CO2 eq</td>
<td>211.2 lbs/10^6 Btu</td>
<td>638,369 mmBTU/yr</td>
<td>67411.73</td>
<td></td>
</tr>
</tbody>
</table>

red tons/yr values are permit limits

* Assume PM10/PM ratio = 0.99 (AP-42, Table 1.6.1, with scrubber)
** Table 1.6-2, Bark and wet wood fired boiler
*** Table 1.6-3

Max short term steaming rate

56000 lbs/hr
0.67 efficiency
1050 BTU/lb steam
8.78E+07 BTU/hr

Max hry emissions include 10% buffer for pollutants with lbs/MMBtu emission rate

BTU and moisture content calculations

<table>
<thead>
<tr>
<th>Year</th>
<th>BTU/Gr lb</th>
<th>CO2 Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>2003</td>
<td>5368</td>
<td>4647</td>
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</table>

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>2,3,7,8-Tetrachlorodibenzo-p-furan</th>
<th>2,4-Dichlorodiphenylhexane</th>
<th>2,4-Dichlorodiphenylmethane</th>
<th>2,4-Dichlorophenol</th>
<th>2,4-Dinitrotoluene</th>
<th>2,6-Dinitrotoluene</th>
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<tbody>
<tr>
<td>Cumene</td>
<td>1.50E-09</td>
<td>1.60E-06</td>
<td>8.47E-10</td>
<td>5.37E-10</td>
<td>1.47E-10</td>
<td>6.57E-11</td>
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<tr>
<td>Cumene</td>
<td>3.65E-09</td>
<td>6.40E-10</td>
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<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Cumene</td>
<td>5.37E-10</td>
<td>1.47E-10</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
<td>0.000</td>
</tr>
<tr>
<td>Cumene</td>
<td>6.57E-11</td>
<td>1.20E-09</td>
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<td>0.000</td>
<td>0.000</td>
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<tr>
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<tr>
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<td>0.002</td>
<td>0.003</td>
<td>0.003</td>
</tr>
<tr>
<td>Cumene</td>
<td>2.30E-05</td>
<td>4.90E-05</td>
<td>0.003</td>
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<td>0.004</td>
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<tr>
<td>Cumene</td>
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<td>5.40E-06</td>
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<td>0.004</td>
<td>0.005</td>
<td>0.005</td>
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<tr>
<td>Cumene</td>
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<td>0.006</td>
<td>0.006</td>
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</tbody>
</table>

**Note:** The table continues with similar entries for other pollutants and their respective concentrations.
## Total Potential Emissions - Bennett Lumber

### Non-fugitive Emissions

<table>
<thead>
<tr>
<th>Source</th>
<th>Particulate (tons/yr)</th>
<th>PM 10 (tons/yr)</th>
<th>PM2.5 (tons/yr)</th>
<th>VOC's (tons/yr)</th>
<th>SO 2 (tons/yr)</th>
<th>CO (tons/yr)</th>
<th>NOx (tons/yr)</th>
<th>CO2 equiv (tons/yr)</th>
<th>EPA HAPs (tons/yr)</th>
<th>Acetaldehyde (tons/yr)</th>
<th>Formaldehyde (tons/yr)</th>
<th>Methanol (tons/yr)</th>
<th>Propionaldehyde (tons/yr)</th>
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</thead>
<tbody>
<tr>
<td>Dry Kilns</td>
<td>3.94</td>
<td>3.94</td>
<td>3.94</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>19.18</td>
<td>4.491</td>
<td>0.725</td>
<td>9.490</td>
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<tr>
<td>Process (excl kilns)</td>
<td>11.74</td>
<td>9.29</td>
<td>8.59</td>
<td>14.63</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>4.07</td>
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<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
<td>0.02</td>
<td>0.73</td>
<td>71.43</td>
<td>0.10</td>
<td>0.002</td>
<td>0.005</td>
<td>0.000</td>
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</tr>
<tr>
<td>Boiler</td>
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<td>99.48</td>
<td>99.48</td>
<td>12.13</td>
<td>7.98</td>
<td>70.22</td>
<td>67411.73</td>
<td>7.63</td>
<td>0.603</td>
<td>0.744</td>
<td>0.234</td>
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<tr>
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<td><strong>137.1</strong></td>
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<td><strong>71.0</strong></td>
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<td><strong>8.966</strong></td>
<td><strong>1.741</strong></td>
<td><strong>9.49</strong></td>
<td><strong>0.351</strong></td>
</tr>
</tbody>
</table>

Permit limits: Fugitive emissions are below the permit limits, which have never reached 70% of permit limits.

### Fugitive Emissions

<table>
<thead>
<tr>
<th>Source</th>
<th>Particulate (tons/yr)</th>
<th>PM 10 (tons/yr)</th>
<th>PM2.5 (tons/yr)</th>
<th>VOC's (tons/yr)</th>
<th>SO 2 (tons/yr)</th>
<th>CO (tons/yr)</th>
<th>NOx (tons/yr)</th>
<th>CO2 equiv (tons/yr)</th>
<th>EPA HAPs (tons/yr)</th>
<th>Acetaldehyde (tons/yr)</th>
<th>Formaldehyde (tons/yr)</th>
<th>Methanol (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitive - Roads</td>
<td>1.00</td>
<td>3.60</td>
<td>0.54</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Transfer - Conveyors</td>
<td>6.27</td>
<td>2.19</td>
<td>1.10</td>
<td>0.00</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Transfer - Trucks</td>
<td>2.14</td>
<td>0.75</td>
<td>0.37</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Storage - Piles</td>
<td>0.30</td>
<td>0.16</td>
<td>0.02</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Storage - Bins</td>
<td>3.09</td>
<td>1.79</td>
<td>0.90</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Solvents</strong></td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>0.18</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>0.08</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>12.8</strong></td>
<td><strong>8.5</strong></td>
<td><strong>2.9</strong></td>
<td><strong>0.2</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.1</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.0</strong></td>
<td><strong>0.0</strong></td>
</tr>
</tbody>
</table>

Fugitive PM2.5 / PM10 fraction from ODEQ AQ-EF08

**PLANTWIDE TOTAL** 128.0 121.2 114.9 137.3 8.0 249.0 71.0 67483.2 24.49 8.9 1.7 9.5
EMERGENCY DIESEL GENERATOR EMISSIONS

one emergency diesel generator

John Deere 275 horsepower

AP-42 sections 3.3 and 3.4 assume 0.007MMbtu/hr/hp

Emission factors from Manufacturer's specifications

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>EF</th>
<th>Hrs/yr</th>
<th>Units</th>
<th>Convert EF to lbs/hp/hr</th>
<th>lb/yr</th>
<th>tons/yr @ 500 hrs/yr</th>
<th>Max lb/hr</th>
<th>avg lb/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>0.15</td>
<td>500</td>
<td>g/hp-hr</td>
<td>0.00033</td>
<td>45</td>
<td>0.02</td>
<td>0.09</td>
<td>0.01</td>
</tr>
<tr>
<td>PM</td>
<td>0.021</td>
<td>500</td>
<td>g/hp-hr</td>
<td>4.6E-05</td>
<td>6</td>
<td>0.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PM10</td>
<td>0.015</td>
<td>500</td>
<td>g/hp-hr</td>
<td>3.3E-05</td>
<td>5</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>PM2.5</td>
<td>0.014</td>
<td>500</td>
<td>g/hp-hr</td>
<td>3.2E-05</td>
<td>4</td>
<td>0.00</td>
<td>0.01</td>
<td>0.00</td>
</tr>
<tr>
<td>VOC *</td>
<td>0.04</td>
<td>500</td>
<td>g/hp-hr</td>
<td>8.8E-05</td>
<td>12</td>
<td>0.01</td>
<td>0.02</td>
<td>0.00</td>
</tr>
<tr>
<td>NOx</td>
<td>4.83</td>
<td>500</td>
<td>g/hp-hr</td>
<td>0.01065</td>
<td>1,464</td>
<td>0.73</td>
<td>2.93</td>
<td>0.17</td>
</tr>
<tr>
<td>SOx</td>
<td>0.002</td>
<td>500</td>
<td>lb/hp-hr</td>
<td>4.5E-06</td>
<td>1</td>
<td>0.0000</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Total tons/yr** (w/o dbl count PM-10 or condens)

CO2 73.96 500 Mmbtu 142.4 71186.5 71.2
CH4 0.003 500 Mmbtu 0.006 2.8875 0.0
N2O 0.0006 500 Mmbtu 0.001 0.5775 0.0
CO2 equiv 74.209 500 Mmbtu 142.9 71426.2 71.4

SOx emissions from AP-42 Section 3, Table 3.4-1 given as 0.00809 * S1, where S1 is the sulfur % in fuel. 0.25% used conservatively here
VOC emission rate listed is for "HC" on manufacturer’s specs
EFs from Table C-1, CO2 equivalent factors from 40CFR98 Table A-1

Exemption limits operation to 500 hrs/yr, which is reflected in PTE calcs above, if uncontrolled emissions assuming 8760 hrs/yr are under 100 tons/yr, as shown in the exemption test.
EMERGENCY DIESEL GENERATOR EMISSIONS

TIER 1 FACILITY_WIDE EMISSIONS

Differences arise solely from 3 exemptions and updates for updates for increased paved area and actual kiln species

One emergency diesel generator installed using a Level 2 exemption

275 horsepower

Emission factors from AP-42 Section 3.4, Table 3.4-3 and 4

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>EF</th>
<th>Hrs/yr</th>
<th>Units</th>
<th>lb/yr</th>
<th>tons/yr</th>
<th>Max lb/hr</th>
<th>avg lb/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>7.76E-04</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>107</td>
<td>0.053</td>
<td>0.053</td>
<td>0.21</td>
</tr>
<tr>
<td>Toluene</td>
<td>2.81E-04</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>39</td>
<td>0.019</td>
<td>0.019</td>
<td>0.08</td>
</tr>
<tr>
<td>Xylenes</td>
<td>1.93E-04</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>27</td>
<td>0.013</td>
<td>0.013</td>
<td>0.05</td>
</tr>
<tr>
<td>Propylene</td>
<td>2.79E-03</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>384</td>
<td>0.192</td>
<td>0.192</td>
<td>0.77</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>7.89E-05</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>11</td>
<td>0.005</td>
<td>0.005</td>
<td>0.02</td>
</tr>
<tr>
<td>Acetaldehyde</td>
<td>2.52E-05</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>3</td>
<td>0.002</td>
<td>0.002</td>
<td>0.01</td>
</tr>
<tr>
<td>Acrolein</td>
<td>7.88E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>1</td>
<td>0.001</td>
<td>0.001</td>
<td>0.00</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>1.30E-04</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>18</td>
<td>0.009</td>
<td>0.009</td>
<td>0.04</td>
</tr>
<tr>
<td>Acenaphthylene</td>
<td>9.23E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>1</td>
<td>0.001</td>
<td>0.001</td>
<td>0.00</td>
</tr>
<tr>
<td>Acenaphthene</td>
<td>4.68E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>1</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Fluorene</td>
<td>1.28E-05</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>2</td>
<td>0.001</td>
<td>0.001</td>
<td>0.00</td>
</tr>
<tr>
<td>Phenanthrene</td>
<td>4.08E-05</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>6</td>
<td>0.003</td>
<td>0.003</td>
<td>0.01</td>
</tr>
<tr>
<td>Anthracene</td>
<td>1.23E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Fluoranthene</td>
<td>4.03E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>1</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Pyrene</td>
<td>3.71E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>1</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Benz(a)anthracene</td>
<td>6.22E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Chrysene</td>
<td>1.53E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Benzo(b)fluoranthene</td>
<td>1.11E-06</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Benzo(k)fluoranthene</td>
<td>2.18E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Benzo(a)pyrene</td>
<td>2.57E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Indeno(1,2,3-cd)pyrene</td>
<td>4.14E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Dibenz(a,h)anthracene</td>
<td>3.46E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Benzo(g,h,i)perylen</td>
<td>5.56E-07</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>0</td>
<td>0.000</td>
<td>0.000</td>
<td>0.00</td>
</tr>
<tr>
<td>Total PAH</td>
<td>2.12E-04</td>
<td>500</td>
<td>lbs/hp-hr</td>
<td>29</td>
<td>0.015</td>
<td>0.015</td>
<td>0.06</td>
</tr>
</tbody>
</table>

Emissions in AP-42 are < values listed

0.103
§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 wood fired boiler is an industrial boiler, as defined in 40 CFR 63.11237, and is located at an area source of HAPs, as defined in §63.2, except as specified in §63.11195.

§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 of this subpart is the collection of all existing industrial, commercial, and institutional boilers within a subcategory, as listed in §63.11200 and defined in §63.11237, located at an area source. The boiler is an affected source and is an existing source.

(2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source. The boiler is an affected and existing source constructed in 1978.

(b) An affected source is a new source if you commenced construction of the affected source after June 4, 2010, and the boiler meets the applicability criteria at the time you commence construction. The boiler is not a new source.

(c) An affected source is a reconstructed source if the boiler meets the reconstruction criteria as defined in §63.2, you commenced reconstruction after June 4, 2010, and the boiler meets the applicability criteria at the time you commence reconstruction. This does not apply. The boiler is an affected source and is an existing source constructed in 1978.

(d) An existing dual-fuel fired boiler meeting the definition of gas-fired boiler, as defined in §63.11237, that meets the applicability requirements of this subpart after June 4, 2010 due to a fuel switch from gaseous fuel to solid fossil fuel, biomass, or liquid fuel is considered to be an existing source under this subpart as long as the boiler was designed to accommodate the alternate fuel. This does not apply. The boiler is a biomass-fired boiler.
(e) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or part 71 as a result of this subpart. You may, however, be required to obtain a title V permit due to another reason or reasons. See 40 CFR 70.3(a) and (b) or 71.3(a) and (b). Notwithstanding the exemption from title V permitting for area sources under this subpart, you must continue to comply with the provisions of this subpart.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7506, Feb. 1, 2013]

§63.11195 Are any boilers not subject to this subpart?
The types of boilers listed in paragraphs (a) through (k) 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), unless such units do not combust hazardous waste and combust comparable fuels.

(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, or part 60, part 61, or part 65 of this chapter provided that at least 50 percent of the average annual heat input during any 3 consecutive calendar years to the boiler is provided by regulated gas streams that are subject to another standard.

(h) Temporary boilers as defined in this subpart.

(i) Residential boilers as defined in this subpart.

(j) Electric boilers as defined in this subpart.

(k) An electric utility steam-generating unit (EGU) covered by subpart UUUUU of this part.

The boiler does not meet any of the exemption requirements of 40 CFR 63.11195(a) through (k).

§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 practice standard no later than March 21, 2014. This requirement applies because the boiler is an affected boiler. It has been permanently complied with. The facility has performed its initial tune-up (2014) and has submitted a notice of compliance for the boiler.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014. This requirement does not apply. The permittee is not in a subcategory provided in Table 1 of the subpart.

(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.

The permittee has an existing boiler that is required to complete a tune-up and a one-time energy assessment. NOTE: The initial boiler tune-up and one-time energy assessment were conducted within the regulatory time line, permanently complying with this requirement.

(b) If you start up a new affected source on or before May 20, 2011, you must achieve compliance with the provisions of this subpart no later than May 20, 2011. This requirement does not apply. The permittee has an existing boiler.

(c) If you start up a new affected source after May 20, 2011, you must achieve compliance with the provisions of this subpart upon startup of your affected source. This requirement does not apply. The permittee has an existing boiler.

(d) If you own or operate an industrial, commercial, or institutional boiler and would be subject to this subpart except for the exemption in §63.11195(b) for commercial and industrial solid waste incineration units covered by 40 CFR part 60, subpart CCCC or subpart DDDD, and you cease combusting solid waste, you must be in compliance with this subpart on the effective date of the waste to fuel switch as specified in §60.2145(a)(2) and (3) of subpart CCCC or §60.2710(a)(2) and of subpart DDDD.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7506, Feb. 1, 2013] This requirement does not apply. The permittee does not own or operate an Industrial, commercial, or institutional boiler and would be subject to this subpart except for the exemption in §63.11195(b) for commercial and industrial solid waste Incineration units covered by 40 CFR part 60, subpart CCCC or subpart DDDD.

§63.11200 What are the subcategories of boilers?

The subcategories of boilers, as defined in §63.11237 are:
(a) Coal

(b) Biomass

(c) Oil

(d) Seasonal boilers.

(e) Oil-fired boilers with heat input capacity of equal to or less than 5 million British thermal units (Btu) per hour.

(f) Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up.

(g) Limited-use boilers.

[78 FR 7506, Feb. 1, 2013]

40 CFR 63.11200(b) applies because the boiler is biomass-fired. 40 CFR 63.11200(a) and (c) through (g) do not apply, only (b) applies.

§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.

40 CFR 63.11201(a) does not apply. The permittee is not in a subcategory provided in table 1 of the subpart.

(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 or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

40 CFR 63.11201(b) applies because the boiler is biomass-fired. The permittee is subject to the following conditions of Table 2: 14, 16.

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

40 CFR 63.11201(c) does not apply because the boiler is not subject to an emission limit in accordance with 40 CFR 63.11201(a).

(d) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart. The permittee must conduct a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that
includes the affected units also satisfies the energy assessment requirement. The energy assessment must include:

- A visual inspection of the boiler or process heater system,
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- An inventory of major energy consuming systems,
- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A review of the facility’s energy management practices, and provides recommendations for improvements consistent with the definition of energy management practices,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified, and
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy (e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7506, Feb. 1, 2013] 40 CFR 63.11201(d) applies at all times. The management practices in Table 2 apply at all times.

§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.
40 CFR 63.11205(a) applies. When operating the boiler, it must be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations applies at all times.

(b) You must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or a continuous monitoring system (CMS), including a continuous emission monitoring system (CEMS), a continuous opacity monitoring system (COMS), or a continuous parameter monitoring system (CPMS), where applicable. You may demonstrate compliance with the applicable mercury emission limit using fuel analysis if the emission rate calculated according to §63.11211(c) is less than the applicable emission limit. Otherwise, you must demonstrate compliance using stack testing.

40 FR 63.11205(b) does not apply. The boiler is not subject to an applicable emission limit.

(c) If you demonstrate compliance with any applicable emission limit through performance stack testing and subsequent compliance with operating limits (including the use of CPMS), with a CEMS, or with a COMS, you must develop a site-specific monitoring plan according to the requirements in paragraphs (c)(1) through (3) of this section for the use of any CEMS, COMS, or CPMS. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

(1) For each CMS required in this section (including CEMS, COMS, or CPMS), you must develop, and submit to the Administrator for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (vi) of this section. You must submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation of your CMS. This requirement to develop and submit a site-specific monitoring plan does not apply to affected sources with existing CEMS or COMS operated according to the performance specifications under appendix B to part 60 of this chapter and that meet the requirements of §63.11224.

(i) Installation of the CMS sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and

(iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

(iv) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(e)(1)(i), (e)(3), and (c)(4)(ii);

(v) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and

(vi) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c) (as applicable in Table 8 to this subpart), (e)(1), and (e)(2)(i).
(2) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(3) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7506, Feb. 1, 2013]

40 CFR 63.11205(c) does not apply. The boiler is not subject to an applicable emission limit.

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

(a) You must demonstrate initial compliance with each emission limit specified in Table 1 to this subpart that applies to you by either conducting performance (stack) tests, as applicable, according to §63.11212 and Table 4 to this subpart or, for mercury, conducting fuel analyses, as applicable, according to §63.11213 and Table 5 to this subpart.

40 CFR 63.11210(a) does not apply. The boiler is not subject to an applicable emission limit.

(b) For existing affected boilers that have applicable emission limits, you must demonstrate initial compliance with the applicable emission limits no later than 180 days after the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in paragraph (k) of this section.

40 CFR 63.11210(b) does not apply. The Boiler is not subject to an applicable emission limit.

(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), except as provided in paragraph (j) of this section.

40 CFR 63.11210(c) does apply. In accordance with 40 CFR 63.11196, the Boiler is subject to an applicable work practice standard and must achieve compliance no later than March 21, 2014. This requirement has been permanently complied with.

(d) For new or reconstructed affected boilers that have applicable emission limits, you must demonstrate initial compliance with the applicable emission limits no later than 180 days after March 21, 2011 or within 180 days after startup of the source, whichever is later, according to §63.7(a)(2)(ix).

40 CFR 63.11210(d) does not apply. The Boiler is not new or reconstructed affected boiler.

(e) For new or reconstructed oil-fired boilers that commenced construction or reconstruction on or before September 14, 2016, that combust only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuels not subject to a particulate matter (PM) emission limit under this subpart and that do not use a post-combustion technology (except a wet scrubber) to reduce PM or sulfur dioxide emissions, you are not subject to the PM emission limit in Table 1 of this subpart until September 14, 2019, providing you monitor and record on a monthly basis the
type of fuel combusted. If you intend to burn a new type of fuel or fuel mixture that does not meet the requirements of this paragraph, you must conduct a performance test within 60 days of burning the new fuel. On and after September 14, 2019, you are subject to the PM emission limit in Table 1 of this subpart and you must demonstrate compliance with the PM emission limit in Table 1 no later than March 12, 2020.

40 CFR 63.11210(e) does not apply. The Boiler is not a new or reconstructed oil-fired boiler.

(f) For new or reconstructed boilers that combust only ultra-low-sulfur liquid fuel as defined in §63.11237, you are not subject to the PM emission limit in Table 1 of this subpart providing you monitor and record on a monthly basis the type of fuel combusted. If you intend to burn a fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel.

40 CFR 63.11210(f) does not apply. The Boiler is not a new or reconstructed ultra-low-sulfur liquid fuel-fired boiler.

(g) For new or reconstructed affected boilers that have applicable work practice standards or management practices, you are not required to complete an initial performance tune-up, but you are required to complete the applicable biennial or 5-year tune-up as specified in §63.11223 no later than 25 months or 61 months, respectively, after the initial startup of the new or reconstructed affected source.

40 CFR 63.11210(g) does not apply. The Boiler is not a new or reconstructed affected boiler.

(h) For affected boilers that ceased burning solid waste consistent with §63.111(d) and for which your initial compliance date has passed, you must demonstrate compliance within 60 days of the effective date of the waste-to-fuel switch as specified in §60.2145(a)(2) and (3) of subpart CCCC or §60.2710(a)(2) and (3) of subpart DDDD. If you have not conducted your compliance demonstration for this subpart within the previous 12 months, you must complete all compliance demonstrations for this subpart before you commence or recommence combustion of solid waste.

40 CFR 63.11210(h) does not apply. The Boiler is not an affected boiler that ceased burning solid waste consistent with 40 CFR 63.11196(d).

(i) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within subpart JJJJJ or the boiler becoming subject to subpart JJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g).

40 CFR 63.11210(i) does not apply. If a fuel switch is proposed, notification will be provided and compliance demonstrated within 180 days of the effective date of the fuel switch.

(j) For boilers located at existing major sources of HAP that limit their potential to emit (e.g., make a physical change or take a permit limit) such that the existing major source becomes an area source, you must comply with the
applicable provisions as specified in paragraphs (j)(1) through (3) of this section.

(1) Any such existing boiler at the existing source must demonstrate compliance with subpart JJJJJJ within 180 days of the later of March 21, 2014 or upon the existing major source commencing operation as an area source.

(2) Any new or reconstructed boiler at the existing source must demonstrate compliance with subpart JJJJJJ within 180 days of the later of March 21, 2011 or startup.

(3) Notification of such changes must be submitted according to §63.11225(g).

40 CFR 63.11210(j) does apply. The Boiler is an existing boiler located at a potential major source of HAP emissions, which limit their potential to emit, such that the existing major source became an area source.

(k) For existing affected boilers that have not operated between the effective date of the rule and the compliance date that is specified for your source in §63.11196, you must comply with the applicable provisions as specified in paragraphs (k)(1) through (3) of this section.

(1) You must complete the initial compliance demonstration, if subject to the emission limits in Table 1 to this subpart, as specified in paragraphs (a) and (b) of this section, no later than 180 days after the re-start of the affected boiler and according to the applicable provisions in §63.7(a)(2).

(2) You must complete the initial performance tune-up, if subject to the tune-up requirements in §63.11223, by following the procedures described in §63.11223(b) no later than 30 days after the re-start of the affected boiler.

(3) You must complete the one-time energy assessment, if subject to the energy assessment requirements specified in Table 2 to this subpart, no later than the compliance date specified in §63.11196.


40 CFR 63.11210(k) does not apply. The Boiler has operated between the effective date of the rule and the compliance date.

§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 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.

_40 CFR 63.11211(a) does not apply. The Boiler is not subject to an applicable emission limit._

(b) You must establish parameter-operating limits according to paragraphs (b)(1) through (4) of this section.

(1) For a wet scrubber, you must establish the minimum scrubber liquid flow rate and minimum scrubber pressure drop as defined in §63.11237, as your operating limits during the three-run performance stack test. If you use a wet scrubber and you conduct separate performance stack tests for PM and mercury emissions, you must establish one set of minimum scrubber liquid flow rate and pressure drop operating limits. If you conduct multiple performance stack tests, you must set the minimum scrubber liquid flow rate and pressure drop operating limits at the highest minimum values established during the performance stack tests.

_40 CFR 63.11211(b)(1) does not apply. A performance test is not required to demonstrate compliance with an emissions limit required by this subpart._

(2) For an electrostatic precipitator operated with a wet scrubber, you must establish the minimum total secondary electric power (secondary voltage and secondary current), as defined in §63.11237, as your operating limits during the three-run performance stack test.

_40 CFR 63.11211(b)(2) does not apply. The permittee does not operate an electrostatic precipitator with a wet scrubber._

(3) For activated carbon injection, you must establish the minimum activated carbon injection rate, as defined in §63.11237, as your operating limit during the three-run performance stack test.

_40 CFR 63.11211(b)(3) does not apply. The permittee does not operate add-on control using activated carbon injection._

(4) The operating limit for boilers with fabric filters that demonstrate continuous compliance through bag leak detection systems is that a bag leak detection system be installed according to the requirements in §63.11224, and that each fabric filter must be operated such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during a 6-month period.

_40 CFR 63.11211(b)(4) does not apply. The permittee does not operate a boiler with fabric filter control._

(c) If you elect to demonstrate compliance with an applicable mercury emission limit through fuel analysis, you must conduct fuel analyses according to §63.11213 and Table 5 to this subpart and follow the procedures in paragraphs (c)(1) through (3) of this section.

(1) If you burn more than one fuel type, you must determine the fuel type, or mixture, you could burn in your boiler that would result in the maximum emission rates of mercury.

(2) You must determine the 90th percentile confidence level fuel mercury concentration of the composite samples analyzed for each fuel type using Equation 1 of this section.
\[ P_{90} = \text{mean} + (\text{SD} \times t) \]  \hspace{1cm} (Eq.1)

Where:

- \( P_{90} \) = 90th percentile confidence level mercury concentration, in pounds per million Btu.
- \( \text{mean} \) = Arithmetic average of the fuel mercury concentration in the fuel samples analyzed according to §63.11213, in units of pounds per million Btu.
- \( \text{SD} \) = Standard deviation of the mercury concentration in the fuel samples analyzed according to §63.11213, in units of pounds per million Btu.
- \( t \) = \( t \) distribution critical value for 90th percentile (0.1) probability for the appropriate degrees of freedom (number of samples minus one) as obtained from a Distribution Critical Value Table.

(3) To demonstrate compliance with the applicable mercury emission limit, the emission rate that you calculate for your boiler using Equation 1 of this section must be less than the applicable mercury emission limit.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7508, Feb. 1, 2013]

40 CFR 63.11211(c)(1) through (3) do not apply. The Boiler is not subject to an applicable mercury emission limit.

§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).

(b) You must conduct each stack test according to the requirements in Table 4 to this subpart. Boilers that use a CEMS for carbon monoxide (CO) are exempt from the initial CO performance testing in Table 4 to this subpart and the oxygen concentration operating limit requirement specified in Table 3 to this subpart.

(c) You must conduct performance stack tests at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for each regulated pollutant, and you must demonstrate initial compliance and establish your operating limits based on these performance stack tests. For subcategories with more than one emission limit, these requirements could result in the need to conduct more than one performance stack test. Following each performance stack test and until the next performance stack test, you must comply with the operating limit for operating load conditions specified in Table 3 to this subpart.

(d) You must conduct a minimum of three separate test runs for each performance stack test required in this section, as specified in §63.7(e)(3) and in accordance with the provisions in Table 4 to this subpart.

(e) To determine compliance with the emission limits, you must use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 of appendix A-7 to part 60 of this chapter to convert the measured PM concentrations and the measured mercury concentrations that result from the performance test to pounds per million Btu heat input emission rates.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7508, Feb. 1, 2013]
§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 I 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.

40 CFR 63.11213(a) through (c) do not apply. The Boiler is not subject to an applicable emission limit in Table 1 and, therefore, not subject to the related required fuel analyses.

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

(a) If you own or operate an existing or new coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must conduct a performance tune-up according to §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate an existing coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

40 CFR 63.11214(a) does not apply. The Boiler is not an existing or new coal-fired boiler.

(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 §63.11210(c) or (g), as applicable, and §63.11223(b). If you own or operate an existing biomass-fired boiler or existing oil-fired boiler, you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted an initial tune-up of the boiler.

40 CFR 63.11214(b) Does apply. The Boiler is an existing biomass-fired boiler subject to a performance tune-up. The Initial Notification of Compliance Status report was submitted on March 5, 2014.

(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 according to Table 2 to this subpart and that the assessment is an accurate depiction of your facility at the
time of the assessment or that the maximum number of on-site technical hours
specified in the definition of energy assessment applicable to the facility has
been expended.

*40 CFR 63.11214(c) does apply. The Boiler is an existing affected boiler with
a heat input capacity of 10 million Btu per hour or greater.*

(d) If you own or operate a boiler subject to emission limits in Table 1 of this
subpart, you must minimize the boiler's startup and shutdown periods
following the manufacturer's recommended procedures, if available. If
manufacturer's recommended procedures are not available, you must follow
recommended procedures for a unit of similar design for which manufacturer's
recommended procedures are available. You must submit a signed statement
in the Notification of Compliance Status report that indicates that you
conducted startups and shutdowns according to the manufacturer's
recommended procedures or procedures specified for a boiler of similar
design if manufacturer's recommended procedures are not available.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7508, Feb. 1,
2013; 81 FR 63126, Sept. 14, 2016]

*40 CFR 63.11214(d) does not apply. The Boiler is not subject to emission
limits in Table 1.*

§63.11220 When must I conduct subsequent performance
tests or fuel analyses?

(a) If your boiler has a heat input capacity of 10 million British thermal units per
hour or greater, you must conduct all applicable performance (stack) tests
according to §63.11212 on a triennial basis, except as specified in paragraphs
(b) through (e) of this section. Triennial performance tests must be completed
no more than 37 months after the previous performance test.

*40 CFR 63.11220(a) does not apply. 40 CFR 63.112212(a) through (e) do not apply. There are no applicable Boiler MACT emission limits for existing biomass sources as documented in Table 1, so no performance test requirements and no 63.11220 applicability*

(b) For new or reconstructed boilers that commenced construction or
reconstruction on or before September 14, 2016, when demonstrating initial
compliance with the PM emission limit, if your boiler's performance test
results show that your PM emissions are equal to or less than half of the PM
emission limit, you do not need to conduct further performance tests for PM
until September 14, 2021, but must continue to comply with all applicable
operating limits and monitoring requirements and must comply with the
provisions as specified in paragraphs (b)(1) through (4) of this section.

1. A performance test for PM must be conducted by September 14, 2021.

2. If your performance test results show that your PM emissions are equal to or
less than half of the PM emission limit, you may choose to conduct
performance tests for PM every fifth year. Each such performance test must
be conducted no more than 61 months after the previous performance test.
(3) If you intend to burn a new type of fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel type.

(4) If your performance test results show that your PM emissions are greater than half of the PM emission limit, you must conduct subsequent performance tests on a triennial basis as specified in paragraph (a) of this section. 

40 CFR 63.11220(b) does not apply. There are no applicable Boiler MACT emission limits for existing biomass sources as documented in Table 1, so no performance test requirements and no 63.11220 applicability

(c) For new or reconstructed boilers that commenced construction or reconstruction after September 14, 2016, when demonstrating initial compliance with the PM emission limit, if your boiler's performance test results show that your PM emissions are equal to or less than half of the PM emission limit, you may choose to conduct performance tests for PM every fifth year, but must continue to comply with all applicable operating limits and monitoring requirements and must comply with the provisions as specified in paragraphs (c)(1) through (3) of this section.

(1) Each such performance test must be conducted no more than 61 months after the previous performance test.

(2) If you intend to burn a new type of fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in §63.11237, you must conduct a performance test within 60 days of burning the new fuel type.

(3) If your performance test results show that your PM emissions are greater than half of the PM emission limit, you must conduct subsequent performance tests on a triennial basis as specified in paragraph (a) of this section.

40 CFR 63.11220(c). (c)(1) and (c)(3) do not apply. There are no applicable Boiler MACT emission limits for existing biomass sources as documented in Table 1, so no performance test requirements and no 63.11220 applicability

(d) If you demonstrate compliance with the mercury emission limit based on fuel analysis, you must conduct a fuel analysis according to §63.11213 for each type of fuel burned as specified in paragraphs (d)(1) through (3) of this section. If you plan to burn a new type of fuel or fuel mixture, you must conduct a fuel analysis before burning the new type of fuel or mixture in your boiler. You must recalculate the mercury emission rate using Equation 1 of §63.11211. The recalculated mercury emission rate must be less than the applicable emission limit.

(1) For existing boilers and new or reconstructed boilers that commenced construction or reconstruction on or before September 14, 2016, when demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, you do not need to conduct further fuel analysis sampling until September 14, 2017, but must continue to comply with all applicable operating limits and monitoring requirements and must comply with the provisions as specified in paragraphs (d)(1)(i) and (ii) of this section.
(i) Fuel analysis sampling for mercury must be conducted by September 14, 2017.

(ii) If your fuel analysis results show that the mercury constituents in the fuel or fuel mixture are equal to or less than half of the mercury emission limit, you may choose to conduct fuel analysis sampling for mercury every 12 months.

(2) For new or reconstructed boilers that commenced construction or reconstruction after September 14, 2016, when demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, you may choose to conduct fuel analysis sampling for mercury every 12 months, but must continue to comply with all applicable operating limits and monitoring requirements.

(3) When demonstrating compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are greater than half of the mercury emission limit, you must conduct quarterly sampling.

40 CFR 63.11220(d), (d)(1) through (d)(3) do not apply. There are no applicable Boiler MACT emission limits for existing biomass sources as documented in Table 1, so no performance test requirements and no 63.11220 applicability.

(e) For existing affected boilers that have not operated on solid fossil fuel, biomass, or liquid fuel since the previous compliance demonstration and more than 3 years have passed since the previous compliance demonstration, you must complete your subsequent compliance demonstration no later than 180 days after the re-start of the affected boiler on solid fossil fuel, biomass, or liquid fuel.

[81 FR 63127, Sept. 14, 2016]

40 CFR 63.11220(e) does not apply. There are no applicable Boiler MACT emission limits for existing biomass sources as documented in Table 1, so no performance test requirements and no 63.11220 applicability.

§63.11221 Is there a minimum amount of monitoring data I must obtain?

(a) You must monitor and collect data according to this section and the site-specific monitoring plan required by §63.11205(c).

40 CFR 63.11221(a) does not apply because 40 CFR 63.11205(c) does not apply. The Boiler is not subject to an applicable emission limit.

(b) You must operate the monitoring system and collect data at all required intervals at all times the affected source is operating and compliance is required, except for periods of monitoring system malfunctions or out-of-control periods (see §63.8(c)(7) of this part), repairs associated with monitoring system malfunctions or out-of-control periods, and required monitoring system quality assurance or quality control activities including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in your site-specific monitoring plan. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless
operation are not malfunctions. You are required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.

40 CFR 63.11221(b) does not apply because 40 CFR 63.11205(b) does not apply. The Boiler is not subject to an applicable emission limit and is not required to operate a CMS.

(c) You may not use data collected during monitoring system malfunctions or out-of-control periods, repairs associated with monitoring system malfunctions or out-of-control periods, or required monitoring system quality assurance or quality control activities in calculations used to report emissions or operating levels. Any such periods must be reported according to the requirements in §63.11225. You must use all the data collected during all other periods in assessing the operation of the control device and associated control system.

40 CFR 63.11221 (c) does not apply because 40 CFR 63.11205(b) does not apply. The Boiler is not subject to an applicable emission limit and is not required to operate a CMS.

(d) Except for periods of monitoring system malfunctions or monitoring system out-of-control periods, repairs associated with monitoring system malfunctions or monitoring system out-of-control periods, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in your site-specific monitoring plan), failure to collect required data is a deviation of the monitoring requirements.

[78 FR 7508, Feb. 1, 2013]

40 CFR 63.11221(d) does not apply because 40 CFR 63.11205(b) does not apply. The Boiler is not subject to an applicable emission limit and is not required to operate a CMS.

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

(a) You must demonstrate continuous compliance with each emission limit and operating limit in Tables 1 and 3 to this subpart that applies to you according to the methods specified in Table 7 to this subpart and to paragraphs (a)(1) through (4) of this section.

(1) Following the date on which the initial compliance demonstration is completed or is required to be completed under §§63.7 and 63.11196, whichever date comes first, you must continuously monitor the operating parameters. Operation above the established maximum, below the established minimum, or outside the allowable range of the operating limits specified in paragraph (a) of this section constitutes a deviation from your operating limits established under this subpart, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.
40 CFR 63.11222(a)(1) does not apply because the Boiler is not subject to an applicable operating limit in Table 3.

(2) If you have an applicable mercury or PM emission limit, you must keep records of the type and amount of all fuels burned in each boiler during the reporting period to demonstrate that all fuel types and mixtures of fuels burned would result in lower emissions of mercury than the applicable emission limit (if you demonstrate compliance through fuel analysis), or result in lower fuel input of mercury than the maximum values calculated during the last performance stack test (if you demonstrate compliance through performance stack testing).

40 CFR 63.11222(a)(2) does not apply because the Boiler is not subject to an applicable emission limit.

(3) If you have an applicable mercury emission limit and you plan to burn a new type of fuel, you must determine the mercury concentration for any new fuel type in units of pounds per million Btu, using the procedures in Equation 1 of §63.11211 based on supplier data or your own fuel analysis, and meet the requirements in paragraphs (a)(3)(i) or (ii) of this section.

(i) The recalculated mercury emission rate must be less than the applicable emission limit.

(ii) If the mercury concentration is higher than mercury fuel input during the previous performance test, then you must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in §63.11212 to demonstrate that the mercury emissions do not exceed the emission limit.

40 CFR 63.11222(a)(3), (a)(3)(i), and (a)(3)(ii) do not apply because the Boiler is not subject to an applicable mercury emission limit.

(4) If your unit is controlled with a fabric filter, and you demonstrate continuous compliance using a bag leak detection system, you must initiate corrective action within 1 hour of a bag leak detection system alarm and operate and maintain the fabric filter system such that the alarm does not sound more than 5 percent of the operating time during a 6-month period. You must also keep records of the date, time, and duration of each alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action taken. You must also record the percent of the operating time during each 6-month period that the alarm sounds. In calculating this operating time percentage, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm is counted as a minimum of 1 hour. If you take longer than 1 hour to initiate corrective action, the alarm time is counted as the actual amount of time taken to initiate corrective action.

40 CFR 63.11222(4) does not apply because the Boiler is not controlled by a fabric filter.

(b) You must report each instance in which you did not meet each emission limit and operating limit in Tables 1 and 3 to this subpart that apply to you. These instances are deviations from the emission limits in this subpart. These deviations must be reported according to the requirements in §63.11225.
§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 performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) Except as specified in paragraphs (c) through (f) of this section, 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. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

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, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

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 (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

4. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

5. Measure the concentrations in the effluent stream of CO 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). Measurements may be taken using a portable CO analyzer.

6. Maintain on-site and submit, if requested by the Administrator, a 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 at high fire or typical operating load, 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 tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

40 CFR 63.11223(b) does apply because the Boiler is subject to the tune-up in accordance with 40 CFR 63.11214(b)

(c) Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed boiler with an oxygen trim system, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up.

40 CFR 63.11223(c) does not apply because the Boiler does have an oxygen trim system.

(d) Seasonal boilers must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed seasonal boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Seasonal boilers are not subject to the emission limits in Table 1 to this subpart or the operating limits in Table 3 to this subpart.

40 CFR 63.11223(d) does not apply because the Boiler is not a seasonal boiler.

(e) Oil-fired boilers with a heat input capacity of equal to or less than 5 million Btu per hour must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed
oil-fired boiler with a heat input capacity of equal to or less than 5 million Btu per hour, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Seasonal boilers are not subject to the emission limits in Table 1 to this subpart or the operating limits in Table 3 to this subpart.  
40 CFR 63.11223(e) does not apply because the Boiler is not an oil-fired boiler.

(f) Limited-use boilers must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed limited-use boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Limited-use boilers are not subject to the emission limits in Table 1 to this subpart, the energy assessment requirements in Table 2 to this subpart, or the operating limits in Table 3 to this subpart.  
40 CFR 63.11223(f) does not apply because the Boiler is not a limited-use boiler.

(g) If you own or operate a boiler subject to emission limits in Table 1 of this subpart, you must minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available. You must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted startups and shutdowns according to the manufacturer’s recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.  
40 CFR 63.11223(g) does not apply because the Boiler is not subject to an emission Table 1.

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

(a) If your boiler is subject to a CO emission limit in Table I to this subpart, you must either install, operate, and maintain a CEMS for CO and oxygen according to the procedures in paragraphs (a)(1) through (6) of this section, or install, calibrate, operate, and maintain an oxygen analyzer system, as defined in §63.11237, according to the manufacturer's recommendations and
paragraphs (a)(7) and (d) of this section, as applicable, by the compliance date specified in §63.11196. Where a certified CO CEMS is used, the CO level shall be monitored at the outlet of the boiler, after any add-on controls or flue gas recirculation system and before release to the atmosphere. Boilers that use a CO CEMS are exempt from the initial CO performance testing and oxygen concentration operating limit requirements specified in §63.1211(a) of this subpart. Oxygen monitors and oxygen trim systems must be installed to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location.

1. Each CO CEMS must be installed, operated, and maintained according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR part 60, appendix B, and each oxygen CEMS must be installed, operated, and maintained according to Performance Specification 3 at 40 CFR part 60, appendix B. Both the CO and oxygen CEMS must also be installed, operated, and maintained according to the site-specific monitoring plan developed according to paragraph (c) of this section.

2. You must conduct a performance evaluation of each CEMS according to the requirements in §63.8(e) and according to Performance Specifications 3 and 4, 4A, or 4B at 40 CFR part 60, appendix B.

3. Each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) every 15 minutes. You must have CEMS data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.

4. The CEMS data must be reduced as specified in §63.8(g)(2).

5. You must calculate hourly averages, corrected to 3 percent oxygen, from each hour of CO CEMS data in parts per million CO concentrations and determine the 10-day rolling average of all recorded readings, except as provided in §63.11221(c). Calculate a 10-day rolling average from all of the hourly averages collected for the 10-day operating period using Equation 2 of this section.

\[
\text{10-day average} = \frac{\sum_{i=1}^{n} H_{pvi}}{n} \quad \text{(Eq. 2)}
\]

Where:
- \(H_{pvi}\) = the hourly parameter value for hour \(i\)
- \(n\) = the number of valid hourly parameter values collected over 10 boiler operating days

6. For purposes of collecting CO data, you must operate the CO CEMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.11221(c). Periods when CO data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

*40 CFR 63.11224(a), and (a)(1) through (a)(6) do not apply because the Boiler is not subject to a CO emission limit in table 1.*
(7) You must operate the oxygen analyzer system at or above the minimum oxygen level that is established as the operating limit according to Table 6 to this subpart when firing the fuel or fuel mixture utilized during the most recent CO performance stack test. Operation of oxygen trim systems to meet these requirements shall not be done in a manner which compromises furnace safety.

40 CFR 63.11224(a)(7) does not apply because the Boiler is not subject to an emission limit in Table 1.

(b) If you are using a control device to comply with the emission limits specified in Table 1 to this subpart, you must maintain each operating limit in Table 3 to this subpart that applies to your boiler as specified in Table 7 to this subpart. If you use a control device not covered in Table 3 to this subpart, or you wish to establish and monitor an alternative operating limit and alternative monitoring parameters, you must apply to the United States Environmental Protection Agency (EPA) Administrator for approval of alternative monitoring under §63.8(f).

40 CFR 63.11224(b) does not apply because the Boiler is not subject to an emission limit in Table 1.

(c) If you demonstrate compliance with any applicable emission limit through stack testing and subsequent compliance with operating limits, you must develop a site-specific monitoring plan according to the requirements in paragraphs (c)(1) through (4) of this section. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

40 CFR 63.11224(c)(1), and (c)(1)(i) through (c)(1)(iii) do not apply because the Boiler is not subject to an emission limit in Table 1 and is not subject to a CMS.

(1) For each CMS required in this section, you must develop, and submit to the EPA Administrator for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (iii) of this section. You must submit this site-specific monitoring plan (if requested) at least 60 days before your initial performance evaluation of your CMS.

(i) Installation of the CMS sampling probe or other interface at a measurement location relative to each affected unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device).

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems.

(iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

40 CFR 63.11224(c)(1), and (c)(1)(i) through (c)(1)(iii) do not apply because the Boiler is not subject to an emission limit in Table 1 and is not subject to a CMS.

(2) In your site-specific monitoring plan, you must also address paragraphs (c)(2)(i) through (iii) of this section.

(i) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (3), and (4)(ii).

(ii) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d).
(iii) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i).

40 CFR 63.11224(c)(2), and (c)(2)(i) through (c)(2)(iii) do not apply because the Boiler is not subject to an emission limit in Table 1 and is not required to have a site-specific monitoring plan in accordance with 40 CFR 63.11205.

3) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

40 CFR 63.11224(c)(3) does not apply because the Boiler is not subject to an emission limit in Table 1 and is not subject to a CMS.

4) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

40 CFR 63.11224(c)(4) does not apply because the Boiler is not subject to an emission limit in Table 1 and is not subject to a CMS.

(d) If you have an operating limit that requires the use of a CMS, you must install, operate, and maintain each CPMS according to the procedures in paragraphs (d)(1) through (4) of this section.

1) The CPMS must complete a minimum of one cycle of operation every 15 minutes. You must have data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.

2) You must calculate hourly arithmetic averages from each hour of CPMS data in units of the operating limit and determine the 30-day rolling average of all recorded readings, except as provided in §63.11221 (c). Calculate a 30-day rolling average from all of the hourly averages collected for the 30-day operating period using Equation 3 of this section.

\[
\text{30-day average} = \frac{\sum_{i=1}^{n} H_{pi}}{n} \quad \text{(Eq. 3)}
\]

Where:

\( H_{pi} = \) the hourly parameter value for hour \( i \)

\( n = \) the number of valid hourly parameter values collected over 30 boiler operating days

3) For purposes of collecting data, you must operate the CPMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.11221(c). Periods when CPMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

4) Record the results of each inspection, calibration, and validation check.

40 CFR 63.11224(d) and (d)(1) through (4) do not apply because the Boiler is not subject to an operating limit.

(e) If you have an applicable opacity operating limit under this rule, you must install, operate, certify and maintain each COMS according to the procedures in paragraphs (e)(1) through (8) of this section by the compliance date specified in §63.11196.
(1) Each COMS must be installed, operated, and maintained according to Performance Specification 1 of 40 CFR part 60, appendix B.

(2) You must conduct a performance evaluation of each COMS according to the requirements in §63.8 and according to Performance Specification 1 of 40 CFR part 60, appendix B.

(3) As specified in §63.8(c)(4)(i), each COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

(4) The COMS data must be reduced as specified in §63.8(g)(2).

(5) You must include in your site-specific monitoring plan procedures and acceptance criteria for operating and maintaining each COMS according to the requirements in §63.8(d). At a minimum, the monitoring plan must include a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit of each COMS.

(6) You must operate and maintain each COMS according to the requirements in the monitoring plan and the requirements of §63.8(e). You must identify periods the COMS is out of control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit.

(7) You must calculate and record 6-minute averages from the opacity monitoring data and determine and record the daily block average of recorded readings, except as provided in §63.1122(l(c)).

(8) For purposes of collecting opacity data, you must operate the COMS as specified in §63.11221(b). For purposes of calculating data averages, you must use all the data collected during all periods in assessing compliance, except that you must exclude certain data as specified in §63.1122(l(c)). Periods when COMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

40 CFR 63.11224(e) and (e)(1) through (8) do not apply because the Boiler is not subject to an opacity operating limit.

(f) If you use a fabric filter bag leak detection system to comply with the requirements of this subpart, you must install, calibrate, maintain, and continuously operate the bag leak detection system as specified in paragraphs (f)(1) through (8) of this section.

(l) You must install and operate a bag leak detection system for each exhaust stack of the fabric filter.

(2) Each bag leak detection system must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations and in accordance with EPA-454/R-98-015 (incorporated by reference, see §63.14).

(3) The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.

(4) The bag leak detection system sensor must provide output of relative or absolute particulate matter loadings.
(5) The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor.

(6) The bag leak detection system must be equipped with an audible or visual alarm system that will activate automatically when an increase in relative particulate matter emissions over a preset level is detected. The alarm must be located where it is easily heard or seen by plant operation personnel.

(7) For positive pressure fabric filter systems that do not duct all compartments or cells to a common stack, a bag leak detection system must be installed in each baghouse compartment or cell.

(8) Where multiple bag leak detectors are required, the system's instrumentation and alarm may be shared among detectors.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7510, Feb. 1, 2013]

40 CFR 63.11224(f) and (f)(1) through (8) do not apply because the permittee does not use fabric filter bag leak detection system to comply with the requirements of this subpart.

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

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

(1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.

40 CFR 63.11225(a) and (a)(1) applies to each 5-yr boiler tune-up.

(2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.

40 CFR 63.11225(a)(2) applies and has been satisfied.

(3) If you are required to conduct a performance stack test you must submit a Notification of intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.

40 CFR 63.11225(a)(3) does not apply because the boiler is not subject to an emission limitation under this rule.

(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you own or operate a new boiler subject only to a requirement to conduct a biennial or 5-year tune-up or you must conduct a performance stack test. If you own or operate a new boiler subject to a requirement to conduct a tune-up, you are not required to prepare and submit a Notification of Compliance Status for the tune-up. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.
40 CFR 63.11225(a)(4) applies. The compliance date is 03/21/14; completed 03/05/14. The permittee is not subject to a performance stack test requirement.

(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."

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

(iv) For units that install bag leak detection systems: "This facility complies with the requirements of §63.11224(f)."

(v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.

40 CFR 63.11225(a)(4), and (a)(4)(i) through (v) applies. The compliance date is 03/21/14; completed 03/05/14. The permittee is not subject to a performance stack test requirement.

(5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.

40 CFR 63.11225(a)(5) does not apply. The permittee is not subject to a performance stack test requirement.

(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 information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.
(2) Statement by a responsible official, with the official's name, title, phone number, email 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. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.112 23 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(l) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(iii)"This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(3) 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.

(4) 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.

40 CFR 63.11225(b), (b)(1), (b)(2)(i), and (b)(3) apply. 40 CFR 63.11225(b)(2)(ii) does not apply because the boiler is not a solid waste incineration unit. 40 CFR 63.11225(b)(2)(iii) and (b)(4) do not apply because the boiler is not subject to an emission limit.

(c) You must maintain the records specified in paragraphs (c)(I) through (7) of this section.

40 CFR 63.11225(c) is a general administrative requirement that applies.

(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.

40 CFR 63.11225(c)(1) is a general administrative requirement that applies.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) 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.
40 CFR 63.11225(c)(2)(i) applies because the boiler is subject to a tune-up requirement.

(ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4.

40 CFR 63.11225(c)(2)(ii) does not apply because the boiler does not combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter.

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

40 CFR 63.11225(c)(2)(iii) does apply because the boiler was required to conduct a one time energy assessment. This requirement was permanently complied with by 2014.

(iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used.

40 CFR 63.11225(c)(2)(iv) does not apply because the boiler is not subject to an emission limit in Table 1 to this subpart.

(v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.

40 CFR 63.11225(c)(2)(v) does not apply because the boiler does not meet the definition of seasonal boiler.

(vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.

40 CFR 63.11225(c)(2)(vi) does not apply because the boiler does not meet the definition of limited-use boiler.

(3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.
40 CFR 63.11225(c)(3) does not apply because the boiler is not required to demonstrate compliance through fuel analysis.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. 
40 CFR 63.11225(c)(4) does apply.

(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. 
40 CFR 63.11225(c)(5) does apply.

(6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.

(i) The date, place, and time of the monitoring event.
(ii) Person conducting the monitoring.
(iii) Technique or method used.
(iv) Operating conditions during the activity.
(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
(vi) Maintenance or connective action taken (if applicable).

40 CFR 63.11225(c)(6) does not apply. The requirements of 40 CFR 63.11221 do not apply because 40 CFR 63.11205(b) does not apply. The Boiler is not subject to an applicable emission limit and is not required to operate a CMS. The requirements of 40 CFR 63.11222 do not apply. See 40 CFR 63.11222 for applicability.

(7) If you use a bag leak detection system, you must keep the records specified in paragraphs (c)(7)(i) through (iii) of this section.

(i) Records of the bag leak detection system output.
(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.
(iii) The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

40 CFR 63.11225(c)(7) and (c)(7)(i) through (iii) does not apply because the permittee does not use a bag leak detection system.

(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years. 40 CFR 63.11225(d) is an administrative requirement that applies.
(e) (1) Within 60 days after the date of completing each performance test (as defined in §63.2) required by this subpart, you must submit the results of the performance tests, including any associated fuel analyses, following the procedure specified in either paragraph (e)(1)(i) or (ii) of this section.

(i) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (https://www3.epa.gov/ttn/chief/ert/ert_info.html) at the time of the test, you must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/).) Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If you claim that some of the performance test information being submitted is confidential business information (CBI), you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, you must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13.

40 CFR 63.11225(e)(1), and (e)(i) through (ii) do not apply because the permittee is not required to perform a performance stack test.

(2) Within 60 days after the date of completing each CEMS performance evaluation (as defined in §63.2), you must submit the results of the performance evaluation following the procedure specified in either paragraph (e)(2)(i) or (ii) of this section.

(i) For performance evaluations of continuous monitoring systems measuring relative accuracy test audit (RATA) pollutants that are supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, you must submit the results of the performance evaluation to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) Performance evaluation data must be submitted in a file format generated through the use of the EPA's ERT or an alternate file format consistent with the XML schema listed on the EPA's ERT Web site. If you claim that some of the performance evaluation information being submitted is CBI, you must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other
commonly used electronic storage media to the EPA. The electronic storage media must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

(ii) For any performance evaluations of continuous monitoring systems measuring RATA pollutants that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the evaluation, you must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13.

40 CFR 63.11225(e)(2, (e)(i) through (e)(ii) do not apply because the permittee is not required to perform a performance evaluation test.

(f) If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice.

(2) The currently applicable subcategory under this subpart.

(3) The date on which you became subject to the currently applicable emission limits.

(4) The date upon which you will commence combusting solid waste.

40 CFR 63.11225(f), and (f)(1) through (4) does not apply because the permittee does not intend to commence or recommence combustion of solid waste.

(g) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within this subpart, in the boiler becoming subject to this subpart, or in the boiler switching out of this subpart due to a fuel change that results in the boiler meeting the definition of gas-fired boiler, as defined in §63.11237, or you have taken a permit limit that resulted in you becoming subject to this subpart or no longer being subject to this subpart, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.


40 CFR 63.11225(g), (g)(1), and (g)(2) is an administrative requirement that applies.
1.1 MACT Applicability (40 CFR 63)


§63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§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) 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.

b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

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

This provision applies to the facility’s John Deere 270HP RICE

d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

e) If you are an owner or operator of a stationary RICE used for national security purposes, you may be eligible to request an exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C.

Subject due to (c) as an area source of HAPs

§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.
   (i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
   (ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
   This provision applies to the facility’s John Deere 270HP 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.
   (iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) New stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.
   (ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.
   (iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(3) Reconstructed stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.
   (ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.
   (iii) A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

(b) Stationary RICE subject to limited requirements. (1) An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).
   (i) The stationary RICE is 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 does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and
(iii).

(ii) The stationary RICE is a new or reconstructed limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(2) A new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

(i) Existing spark ignition 2 stroke lean bum (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(ii) Existing spark ignition 4 stroke lean bum (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that does not operate or is not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii).

(iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(v) Existing stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(c) Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart 1111, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;

(2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;

(4) A new or reconstructed spark ignition 4 stroke rich bum (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;
(6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

Applicable to fire water pump via (1)(ii) as existing stationary RICE at an area source

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

Affected sources. (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.

(2) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions before August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart no later than August 16, 2004.

(3) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(4) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(5) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this
subpart upon startup of your affected source.

(6) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(7) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(b) Area sources that become major sources. If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, the compliance dates in paragraphs (b)(1) and (2) of this section apply to you.

(1) Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source.

(2) Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source become a major source of HAP.

(c) If you own or operate an affected source, you must meet the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A.

Compliance date October 19, 2013 per (1)(a) for an area source

§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 1b and Table 2b to this subpart that apply to you.
(b) If you own or operate an existing stationary non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP that meets either paragraph (b)(1) or (2) of this section, you do not have to meet the numerical CO emission limitations specified in Table 2d of this subpart. Existing stationary non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP that meet either paragraph (b)(1) or (2) of this section must meet the management practices that are shown for stationary non-emergency CI RICE with a site rating of less than or equal to 300 HP in Table 2d of this subpart.

1. The area source is located in an area of Alaska that is not accessible by the Federal Aid Highway System (FAHS).

2. The stationary RICE is located at an area source that meets paragraphs (b)(2)(i), (ii), and (iii) of this section.

   i. The only connection to the FAHS is through the Alaska Marine Highway System (AMHS), or the stationary RICE operation is within an isolated grid in Alaska that is not connected to the statewide electrical grid referred to as the Alaska Railbelt Grid.

   ii. At least 10 percent of the power generated by the stationary RICE on an annual basis is used for residential purposes.

   iii. The generating capacity of the area source is less than 12 megawatts, or the stationary RICE is used exclusively for backup power for renewable energy.

(c) If you own or operate an existing stationary non-emergency CI RICE with a site rating of more than 300 HP located on an offshore vessel that is an area source of HAP and is a nonroad vehicle that is an Outer Continental Shelf (OCS) source as defined in 40 CFR 55.2, you do not have to meet the numerical CO emission limitations specified in Table 2d of this subpart. You must meet all of the following management practices:

1. Change oil every 1,000 hours of operation or annually, whichever comes first. Sources have the option to utilize Can oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement.

2. Inspect and clean air filters every 750 hours of operation or annually, whichever comes first, and replace as necessary.

3. Inspect fuel filters and belts, if installed, every 750 hours of operation or annually, whichever comes first, and replace as necessary.

4. Inspect all flexible hoses every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
(d) If you own or operate an existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions that is certified to the Tier 1 or Tier 2 emission standards in Table 1 of 40 CFR 89.112 and that is subject to an enforceable state or local standard that requires the engine to be replaced no later than June 1, 2018, you may until January 1, 2015, or 12 years after the installation date of the engine (whichever is later), but not later than June 1, 2018, choose to comply with the management practices that are shown for stationary non-emergency CI RICE with a site rating of less than or equal to 300 HP in Table 2d of this subpart instead of the applicable emission limitations in Table 2d, operating limitations in Table 2b, and crankcase ventilation system requirements in §63.6625(g). You must comply with the emission limitations in Table 2d and operating limitations in Table 2b that apply for non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions by January 1, 2015, or 12 years after the installation date of the engine (whichever is later), but not later than June 1, 2018. You must also comply with the crankcase ventilation system requirements in §63.6625(g) by January 1, 2015, or 12 years after the installation date of the engine (whichever is later), but not later than June 1, 2018.

(e) If you own or operate an existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions that is certified to the Tier 3 (Tier 2 for engines above 560 kilowatt (kW)) emission standards in Table 1 of 40 CFR 89.112, you may comply with the requirements under this part by meeting the requirements for Tier 3 engines (Tier 2 for engines above 560 kW) in 40 CFR part 60 subpart III instead of the emission limitations and other requirements that would otherwise apply under this part for existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions.

(f) An existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP must meet the definition of remote stationary RICE in §63.6675 on the initial compliance date for the engine, October 19, 2013, in order to be considered a remote stationary RICE under this subpart. Owners and operators of existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that meet the definition of remote stationary RICE in §63.6675 of this subpart as of October 19, 2013 must evaluate the status of their stationary RICE every 12 months. Owners and operators must keep records of the initial and annual evaluation of the status of the engine. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of this subpart, the owner or operator must comply with all of the requirements for existing...
non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.

As stated in §63.6603, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

Table 2d to Subpart ZZZZ of Part 63-Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

| For Each | You Must Meet the Following requirement, except during periods of startup... | During periods of startup you must...
<table>
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<tr>
<td>4. Emergency stationary CI RICE and black start stationary CI RICE.2</td>
<td>a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</td>
<td>Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.</td>
</tr>
</tbody>
</table>

1Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

2If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

No emission limits apply for engine under 300HP, operating limitations in Table 2d apply per (a)(b)(c)

The requirements in the Table above represent the only operational requirements applicable to the facility’s John Deere 270HP RICE

§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. *The general requirement (b) applies to all RICE covered by ZZZZ, not subject to any emission limitation for engines under 300HP.*

**§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:

1. An existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions;

The requirements above apply to all RICE covered by ZZZZ

(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.

The requirement(s) above apply

(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.

The requirements above apply to all RICE covered by ZZZZ

(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 business 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 business 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.

The requirements above apply

§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, operating limitation, and other requirements 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.

Not subject to any emission limitation for engines under 300HP

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

Not subject to any emission limitation for engines under 300HP

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating
of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

The requirements above applies

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. There is no time limit on the use of emergency stationary RICE in emergency situations.

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

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and
transmission operator, or the insurance company associated with the engine. 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 calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

These requirements apply

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

This requirement applies

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

Does not apply

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

Does not apply

§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;

(2) An existing stationary RICE located at an area source of HAP emissions.

The referenced reporting requirements apply at this area source of HAPs

§63.6655  What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions
in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(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;

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (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 engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(1) 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 that does not meet the standards applicable to non-emergency engines.

(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.

As an existing stationary RICE, recordkeeping requirements apply, though no emission limits or testing apply to this less than 300 HP RICE at an area source of HAPs

§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).

The 5 year recordkeeping requirement here applies to records for the facility’s RICE.

§63.6665 What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions specified in Table 8: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing stationary RICE that combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions specified in Table 8 except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE.

The permittee is subject to the General Requirements provided in Table 8 except for the notification requirements of 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), and (g) and (h).
<table>
<thead>
<tr>
<th>Permit Condition</th>
<th>Description</th>
<th>2 Compliance Determination Method</th>
<th>3 Monitoring Frequency</th>
<th>4 Deviations and Excess Emissions Events</th>
<th>5 Permit Condition Compliance Status</th>
<th>6 Attachment</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1</td>
<td>Reasonable precautions to prevent fugitive emissions</td>
<td>Reasonable Control</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td>I</td>
</tr>
<tr>
<td>3.2</td>
<td>Monitor &amp; record fugitive emission control (if needed)</td>
<td>EPA Method 8.1</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
<tr>
<td>3.3</td>
<td>Maintain record of fugitive emission complaints and corrective actions</td>
<td>EPA Method 8.1</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
<tr>
<td>3.4</td>
<td>Conduct quarterly fugitive emission visual inspection - Address issues - record results</td>
<td>Method 22</td>
<td>I</td>
<td>No Excess Emissions except isolated opacity excursions associated with boiler restarts covered under 3.10 - 3.14</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
<tr>
<td>3.5</td>
<td>Shall not cause air emission</td>
<td>Reasonable Control</td>
<td>C</td>
<td>Not Applicable</td>
<td>C</td>
<td>I</td>
</tr>
<tr>
<td>3.6</td>
<td>Maintain record of air pollution complaints and corrective actions</td>
<td>EPA Method 8.1</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
<tr>
<td>3.7</td>
<td>Opacity shall not exceed 20% for more than 3 minutes in a 30 minute period</td>
<td>EPA Method 9</td>
<td>I</td>
<td>Isolated opacity excursions, primarily during boiler restarts</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
<tr>
<td>3.8, 3.9</td>
<td>Performance quarterly Visible Emission inspection &amp; corrective actions (if any)</td>
<td>EPA Method 9</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td>Log on file onsite</td>
</tr>
</tbody>
</table>

### Excess Emissions

<table>
<thead>
<tr>
<th>Event</th>
<th>Description</th>
<th>Frequency</th>
<th>Method</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.10 - 3.14</td>
<td>Excess Emission rule apply General, start-up / shutdown, upset breakdown, reporting, recordkeeping (IDAPA 58.01.01.120 - 125)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.8</td>
<td></td>
<td>Isolated Opacity excursions, primarily during boiler restarts</td>
<td>Method 2</td>
<td>C</td>
</tr>
</tbody>
</table>

### Tables

**Tier I ANNUAL COMPLIANCE CERTIFICATION TABLE**

**FORM AQ-C2**

**Facility/Permittee Name:** Bennett Lumber Products, Inc.

**Location:** Princeton, Idaho

**Compliance Reporting Period:** January 2021 through 2021 permit renewal application submittal

**Tier I Operating Permit No.:** T1-2014.0031

**Issuance Date:** 3/23/2017

**Compliance Determination Method:**

<table>
<thead>
<tr>
<th>Permit Condition</th>
<th>Description</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1</td>
<td>Reasonable precautions to prevent fugitive emissions</td>
<td>Reasonable Control</td>
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<tr>
<td>3.5</td>
<td>Shall not cause air emission</td>
<td>Reasonable Control</td>
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<td>EPA Method 8.1</td>
</tr>
<tr>
<td>3.7</td>
<td>Opacity shall not exceed 20% for more than 3 minutes in a 30 minute period</td>
<td>EPA Method 9</td>
</tr>
<tr>
<td>3.8, 3.9</td>
<td>Performance quarterly Visible Emission inspection &amp; corrective actions (if any)</td>
<td>EPA Method 9</td>
</tr>
</tbody>
</table>

### Monitoring and Recordkeeping

- **Maintenance of records:**
  - Maintenance records
  - Report on file on IDEQ
  - Source test reports on file

### Performance Testing

- **Performance testing:**
  - Maintain source test protocols
  - Maintain source test records
  - Source test reports on file

### Permit Condition Compliance

- **Tier I Annual Compliance Certification Table**
  - Maintenance of monitoring and recordkeeping files
  - Maintenance of source test protocols
  - Source test reports on file

### Federal Requirements

- **Federal Requirements:**
  - **Federal 40CFR Provisions:**
    - Sulfur Content (IDAPA 58.01.01.322.06, 07)
    - Federal Open Burning Rules (IDAPA 58.01.01.322.06, 07)
  - Fugitive Emissions
    - Visible Emissions (IDAPA 58.01.01.322.06, 07)
    - Odors (IDAPA 58.01.01.322.06, 07)
  - Excess Emissions
    - Sulfur Content
    - Federal Open Burning Rules
    - Fugitive Emissions
    - Excess Emissions
  - Permit Condition Compliance (IDAPA 58.01.01.322.06, 07)

### Facility-Wide Conditions

- **Facility-Wide Conditions Table**
  - Visible Emissions: 20% opacity (EPA Method 9)
  - Odors: Isolated opacity excursions
  - Excess Emissions: None

### Emissions Unit Group 1 - Zorn Industries Hog Fuel Boiler

- **Emissions Unit Group 1 - Zorn Industries Hog Fuel Boiler:**
  - **Emissions Unit Group 1 - Zorn Industries Hog Fuel Boiler:**
    - Visibility limit - 20% opacity (EMI Method 3007)
    - Visibility limit - 20% opacity (EMI Method 3007)
    - Visibility limit - 20% opacity (EMI Method 3007)
    - Visibility limit - 20% opacity (EMI Method 3007)

### Boiler Fuelled by wood only

- **Boiler fuelled by wood only:**
  - P-2007.0107
  - Not Applicable

### Boiler Maintenance

- **Boiler Maintenance:**
  - Boiler log and source test reports on file
  - Boiler log and source test reports on file
  - Boiler log and source test reports on file

### Temperature Controls

- **Temperature Controls:**
  - Boiler temperature limit - 1000 °F (EMI Method 3007)
  - Boiler temperature limit - 1000 °F (EMI Method 3007)
  - Boiler temperature limit - 1000 °F (EMI Method 3007)
  - Boiler temperature limit - 1000 °F (EMI Method 3007)

### Emissions Tracking

- **Emissions Tracking:**
  - Emissions tracking for steam rate and PM10 emissions
  - Emissions tracking for steam rate and PM10 emissions
  - Emissions tracking for steam rate and PM10 emissions
  - Emissions tracking for steam rate and PM10 emissions

### Emissions Reporting

- **Emissions Reporting:**
  - Emissions reporting for steam rate and PM10 emissions
  - Emissions reporting for steam rate and PM10 emissions
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<table>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>5.2, 5.3</td>
<td>Process weight limits</td>
<td>opacity measurements, equipment maintenance</td>
<td>C</td>
<td>Not Applicable</td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.4</td>
<td>Annual throughput limit of 1,200 MT/yr for each combustor</td>
<td>Inventory tracking</td>
<td>C</td>
<td>Not Applicable</td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.5, 5.8</td>
<td>Temperature monitoring on each kiln, hourly recording</td>
<td>Kfh monitoring and recording, HAP emissions to date must be monitored, and ambient must stay below 200 degrees</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
<td>C</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.6</td>
<td>Monitor &amp; record for each site the monthly throughput by type of fuel and time of operation. The monthly throughput values shall be summed for each combustor. Each month's emissions to be documented with a spreadsheet incorporating permit-issued HAP emissions reporting.</td>
<td>I</td>
<td>Not Applicable</td>
<td>C</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5.7</td>
<td>RPM Monitoring</td>
<td>Spreadsheets incorporating permit-issued HAP emissions tracking</td>
<td>Not Applicable</td>
<td>Not Applicable</td>
<td>C</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**6 Emission Limit Group 3: Woodworking Equipment (Cyclones, Baghouse Cyclones, Baghouses)**

| 3.7 | Visible emissions limit - 30% opacity | IDAPA 58.01.01.025 | I | Not Applicable | C |
| 3.8 | Perform quarterly VE on cyclones and baghouses. Records maintain in accordance with Section 3.22. Take corrective actions as necessary. | IDAPA 58.01.01.322.06, 322.08 | I | Not Applicable | C |
| 6.1 | Particulate emission limit - PIN-10 hourly and annually from each of the 6 exhaust ducts | Calculations | I | Not Applicable | C |
| 6.2 | Particulate emission limit - Process Weight for sources operating prior to 10/01/1979 | Calculations | I | Not Applicable | C |
| 6.3 | Maintain cyclones and baghouses equipment in good working order & operate efficiently | C no deviations | Not Applicable | C |
| 6.4 | Monitor and update Cyclone/Baghouse Filter System Procedure Manual | Copy of Manual | I | Not Applicable | C |
| 6.5 | Perform and keep records on monitoring required by cyclone/Baghouse system Procedure Manual | Regular monitoring and recordkeeping | I | Not Applicable | C |

**7 RICE Section**

| 7.1, 7.2 | 27hp compression ignition engine must comply with Subpart 222 as of May 3, 2013 | Documentation showing below 7.5% | C | no deviations | C |
| 7.3 | RICE emission limits | Documentation showing below 7.5% | C | no deviations | C |
| 7.4 | RICE emission limits | Documentation showing below 7.5% | C | no deviations | C |
| 7.6 | RICE emission limits | Hour meter | C | no deviations | C |
| 7.7 | Minimum daily, 24-hour, 3-month limits apply | Hour meter log | C | no deviations | C |
| 7.8 | Required oil change frequency | Follow RICE rules, manufacturer's guidance | C | no deviations | C |
| 7.9 | RICE limits for emergency and non-emergency use | Hour meter | C | no deviations | C |
| 7.5, 7.10 | Reporting, recordkeeping requirements for maintenance, hours of operation | Maintenance logs | C | no deviations | C |

**9 Insignificant Activities: 19 storage areas, 12 transfer points, 8 point sources, 10 fuel storage or VOC usage areas, and an emergency generator**

| 9.1, 9.2 | All significant activities required under the Facility Rule require compliance | IDAPA 58.01.01.322.05, 322.05, 322.06 | Not Applicable | Not Applicable | C |

**10 Tier I OP General Provisions**

**General Compliance**

| 10.1 | Permit shall comply with all conditions of the permit - noncompliance = violation | C | Not Applicable | C |
| 10.2 | Require to reduce or halt activities to maintain compliance shall not be a defense | Not Applicable | Not Applicable | C |
| 10.3 | Permittee shall submit corrected information promptly upon becoming aware of any incorrect information submitted for this permit | Not Applicable | Not Applicable | C |

**Reporing**

| 10.4 | Permit may be required, amended, modified, renewed or terminated for cause | Not Applicable | Not Applicable | C |
| 10.5 | Filing a request for permit change does not stay any current permit condition | Not Applicable | Not Applicable | C |

**Property Rights**

| 10.6 | Permit does not convey any property rights or exclusive privileges | Not Applicable | Not Applicable | C |

**Information Requests**

| 10.7 | Permittee shall furnish information request | Not Applicable | Not Applicable | C |
| 10.8 | Permittee shall provide DEQ records required to be maintained in permit, when requested | Not Applicable | Not Applicable | C |

**Severability**

| 10.9 | Permit provisions are severable, any provision that is not enforceable | Not Applicable | Not Applicable | C |

**Inclusions requiring Permit Revision or Notice**

| 10.10 | PTC required prior to commencement of any construction/modification of a source | Not Applicable | Not Applicable | C |
| 10.11 | Changes requiring Tier IOP | Not Applicable | Not Applicable | C |

**Federal and State Enforcement**

| 10.12 | All terms/conditions of the permit are fully enforceable unless stated otherwise | Not Applicable | Not Applicable | C |
| 10.13 | State only provisions are enforceable under state law | C | Not Applicable | C |

**Inspection and Entry**

| 10.14 | DEQ or representative shall be allowed to enter, inspect, & obtain records | Premises and records onsite were available for DEQ inspection, as verified by DEQ inspectors | Not Applicable | Not Applicable | C |

**New Requirements During Permit**

| 10.15 | Permit will be issued with applicable requirements that became effective during permit term | Not Applicable | Not Applicable | C |

**Permit Eligibility**

| 10.16 | Pay annual Tier I source fees to DEQ | I | C | Have paid all assessed fees | C |
| 10.17 | All documents submitted to DEQ shall comply with IDAPA 58.01.01.01-03 certification | I | C | All submitted certified | C |

**Renewal**

| 10.18, 10.19 | Tier I OP permit application for renewal shall be submitted between 6 and 18 months prior to permit expiration date | DEQ permit requirements for Tier I permit modifications and renewal applications | C | C | C |

**Compliance Schedule and Progress reports**

<p>| P | C | C | C | C | C |</p>
<table>
<thead>
<tr>
<th>Permit Condition</th>
<th>Description</th>
<th>Compliance Determination Method</th>
<th>Monitoring Frequency</th>
<th>2</th>
<th>Deviations and Excess Emissions Events</th>
<th>3</th>
<th>Permit Condition Compliance Status</th>
<th>4</th>
<th>5</th>
<th>6</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.21</td>
<td>C = Continuous I = Intermittent N/A = Not Applicable</td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>10.22, 10.23</td>
<td>Submit compliance certificates annually</td>
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<tr>
<td></td>
<td>Compliance certification shall be submitted to IDEQ; a copy sent to EPA</td>
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<tr>
<td>10.24</td>
<td>No person shall knowingly make false statements, certifications, representations, reports, etc.</td>
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<tr>
<td>10.25</td>
<td>No person shall knowingly render inaccurate any monitoring device or method required</td>
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<tr>
<td>10.26</td>
<td>Semi-Annual Monitoring Reports</td>
<td></td>
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<tr>
<td>10.27</td>
<td>Reporting Deviations and Excess Emissions</td>
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<td>10.28</td>
<td>Permit Revisions Not Required</td>
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<td>10.29</td>
<td>Emergency</td>
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**Periodic Compliance Certification**

- **Permit Condition:** 10.22, 10.23
- **Description:** Submit compliance certificates annually
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**False Statements**

- **Permit Condition:** 10.24
- **Description:** No person shall knowingly make false statements, certifications, representations, reports, etc.
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**No Tampering**

- **Permit Condition:** 10.25
- **Description:** No person shall knowingly render inaccurate any monitoring device or method required
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**Semi-Annual Monitoring Reports**

- **Permit Condition:** 10.26
- **Description:** Semi-Annual Monitoring Reports
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**Reporting Deviations and Excess Emissions**

- **Permit Condition:** 10.27
- **Description:** Reporting Deviations and Excess Emissions
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**Permit Revisions Not Required**

- **Permit Condition:** 10.28
- **Description:** Permit Revisions Not Required
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable

**Emergency**

- **Permit Condition:** 10.29
- **Description:** Emergency
- **Compliance Determination Method:** Not Applicable
- **Monitoring Frequency:** Not Applicable
- **Deviations and Excess Emissions Events:** Not Applicable
- **Permit Condition Compliance Status:** C
- **Attachment:** Not Applicable