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DEPARTMENT OF ENVIRONMENTAL QUALITY
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3759 Highway 6 P.O. Box 130 Princeton, ID 83857-0130

Phone: (208) 875-1121

Fax: (208) 875-0191



August 8, 2014

Attention: William Rogers
Idaho Department of Environmental Quality
Air Quality Program Office – Application Processing
1410 N. Hilton
Boise, ID 83706-1255

**RE: Application for renewal of the Bennett Lumber Products T1-050201 Title V
Tier 1 Air Operating Permit**

Idaho DEQ,

This package provides the application for renewal of the referenced Bennett Lumber Products Title V air operating permit. This application is provided consistent with the requirements in our current Permit T1-050201 and IDAPA 58.01.01.300 -336 and IDEQ Guidance.

One printed copy and one electronic copy of the Title V air operating permit renewal application will be provided, consistent with the recommendation by IDEQ Air Permits manager William Rogers. The printed copy of the application is enclosed with this package. The electronic copy will be sent in a separate mailing by Chris Johnson before the August 11 submittal deadline.

This application was prepared consistent with the guidance from IDEQ. Aggressive efforts have been taken to provide a thorough application, including verifying IDEQ recommendations to minimize the chances of an incompleteness determination. Those efforts are reflected in this permit application. Appendix D of the application includes the IDEQ Tier 1 Operating Permit Application Completeness Checklist documenting the location within the application of all required information. Our certification of Truth, Accuracy, and Completeness included on form GI in Appendix A of the application covers all information provided supporting this application, including the electronic files that will arrive separately.

We have followed IDEQ guidance and tried to provide an application thorough enough to ensure that it is determined complete. We will follow up this application by promptly providing any information IDEQ verifies during review is necessary to support it. Any technical follow-up inquiries should be directed to our environmental contact, Chris Johnson, at 208-628-4036.

Thank you.

Sincerely,



Jeff Abbott
Plant Engineer
Bennett Lumber Products, Inc.
PO Box 130
Princeton, ID 83857-0130

Bennett Lumber Products

Tier 1 Operating Permit Renewal Application

**Submitted to:
Idaho Department of Environmental Quality
Air Quality Division
1410 N. Hilton
Boise, Idaho 83706**

August 4, 2014

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Attachment 2 CAM Plan, Cyclone and Baghouse / Filter System Procedures Manual, Cyclone O&M Manual, and Storage Bin O&M Manuals

Attachment 3 IDEQ Tier 1 Operating Permit Application Completeness Checklist

Introduction and Overview

Introduction

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. The facility has had no changes in permitted operations since its last air operating permit renewal in 2011.

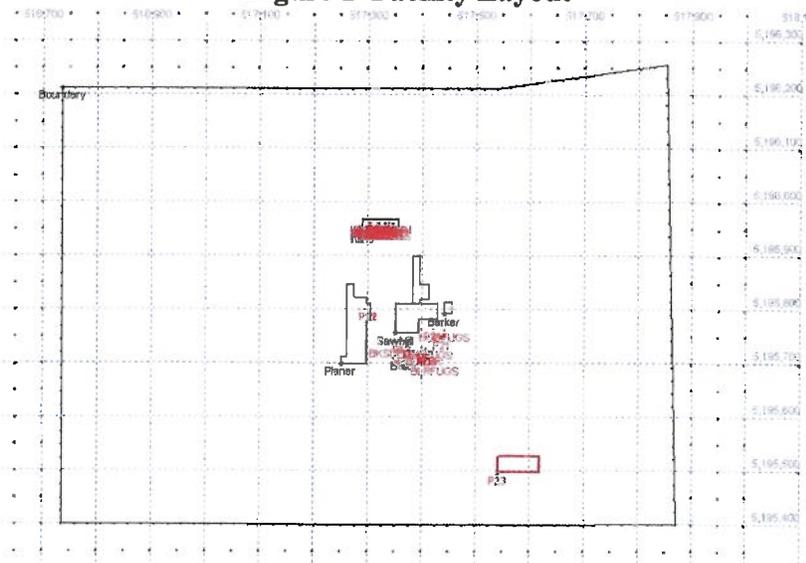
Logs are stored, sorted, debarked, squared in a band saw/chipper which produces slabs and chips as byproducts, and finally reduced to dimensional lumber. Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel. Most of the lumber is dried 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 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 seven cyclones and a baghouse.

Facility Location

The facility is located in a rural area approximately three miles east of Princeton, Idaho and two miles west of Harvard, Idaho in Latah County. The exact location in relation to the surrounding area is shown in Figure 2-1, showing property boundary, and Figure 2-2 showing regional location.

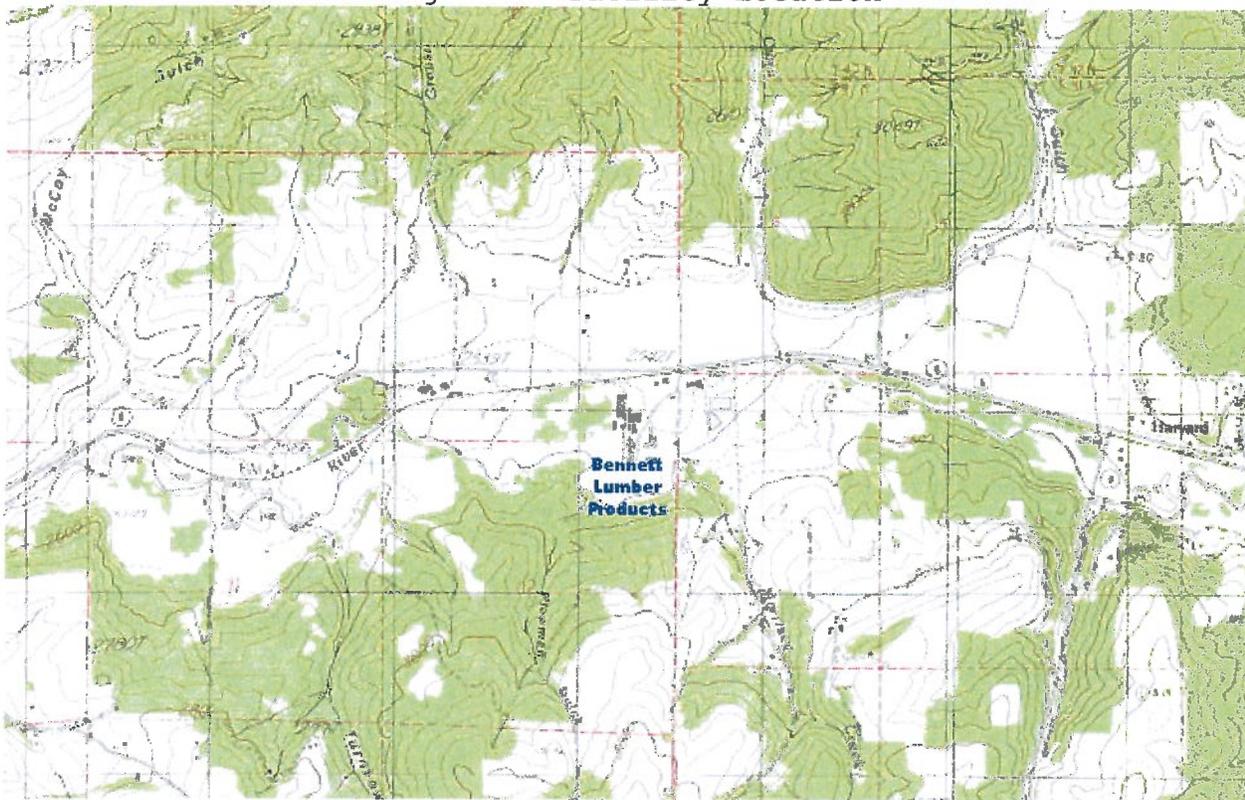
Figure 1 Facility Layout



Bennett Lumber Products, Inc. Title V permit renewal application 0814

The ambient boundary is the fenced area boundary shown in Figure 2-1. All stack emission sources are over 250 feet from the property boundary and ambient air.

Figure 2 Facility Location



1.0 Application Forms and Checklists

Permit Application Forms

All forms required by IDEQ for this air operating permit renewal application are in Appendix B, as confirmed by the completion checklist in Appendix D

The facility-wide emission inventory in Appendix C documents all regulated pollutants emitted at the facility, and from each process and point.

2.0 Process Description

General Discussion

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.

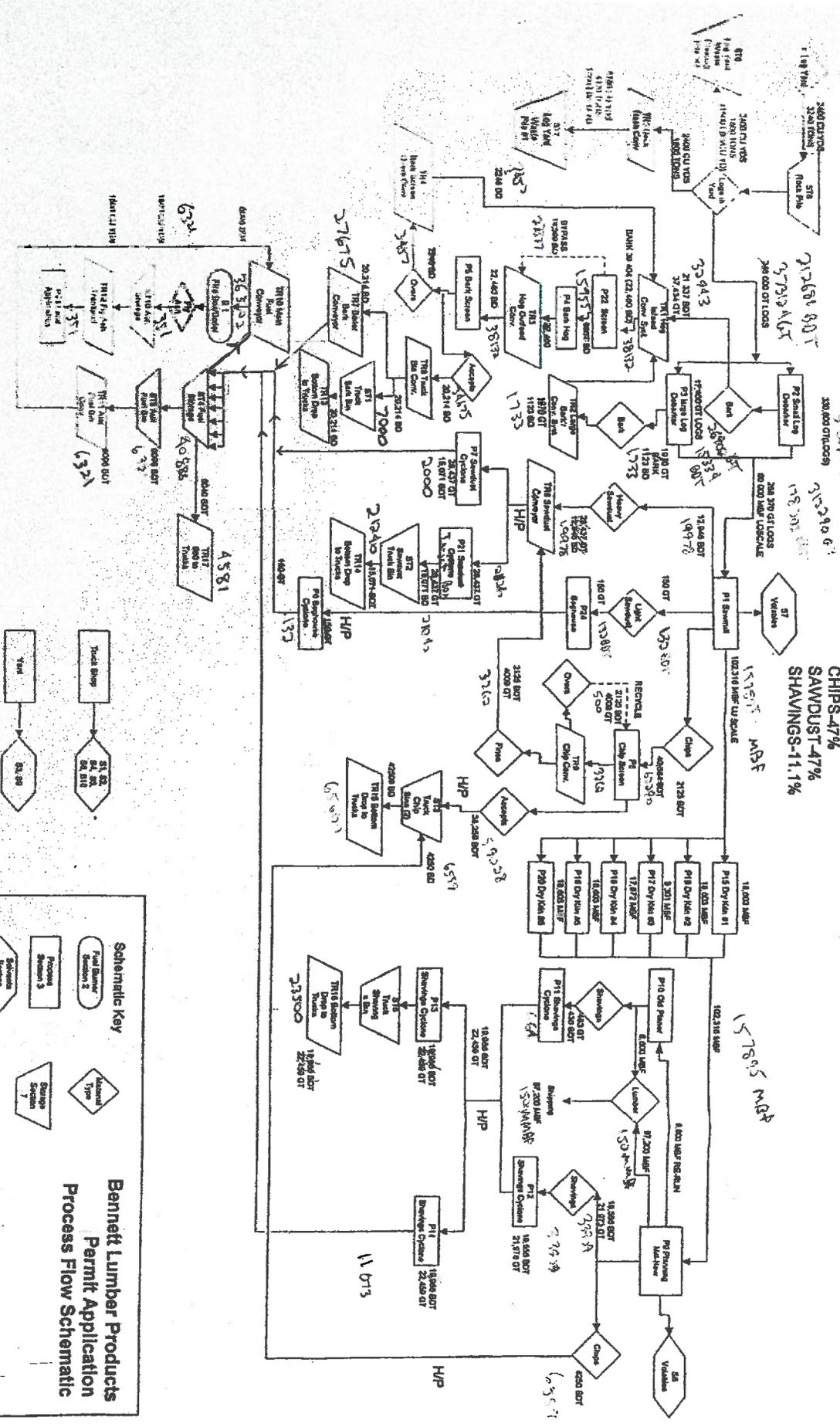
Logs are stored, sorted, debarked, squared in a band saw/chipper which produces slabs and chips as byproducts, and finally reduced to dimensional lumber. Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel. Most of the lumber is dried 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 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 seven cyclones and a baghouse.

3.0 Process Flow Diagram

The facility's process flow diagram, exactly as submitted in a 2007 PTC application and used for the last IDEQ Tier 1 air operating permit renewal, is on the following page. The only change made since then was the permitting of a 7th dry kiln via PTC 2007.0107 to share the same throughput shown for six dry kilns.

1979A7 VDU
 21232365
 310106
 178 201 001
 1575 MRF
 BANK-43.0%
 HOG FUEL-43.0%
 CHIPS-47%
 SAWDUST-47%
 SHAVINGS-11.1%
 BDT=GT x (1-MC)



Schematic Key
 Fuel Burner
 Process System 1
 Process System 2
 Process System 3
 Sawdust System
 H/P High Pressure
 Natural Type
 Storage Tank
 Transfer Receiver
 CS Environmental
 6/1/07

Handwritten notes: 'Handwritten numbers provide updates consistent with 6/1/07 Permit Application. Also includes stable changes in routing of boiler feed. From previous permit flow diagrams.'

All units BDT, unless otherwise stated.

4.0 Applicable Regulatory Requirements

Applicable and Inapplicable IDAPA 58.01.01 Requirements

The facility has made no changes in operations since the issuance of previous IDEQ air permits, nor does it request any changes here. Applicable IDEQ regulations are as described in the Statements of basis for the facilities existing permits.

Applicable and Inapplicable Federal Regulations

As documented above, the facility has made no changes in operations since the issuance of previous IDEQ air permits, nor does it request any changes here. Applicable IDEQ regulations are as described in the Statements of basis for the facilities existing permits.

Table 4-3 and 4-4 documents historically applicable federal regulations at the time of our last IDEQ air permit application, consistent with IDEQ's review and permit Statements of Bases.

Table 4-1 **Applicable and Non-Applicable New Source Performance Standards (40 CFR Part 60)**

Rule Description - 40 CFR Part 60 - New Source Performance Standards	Applicable?
Large Municipal Waste Combustors that are Constructed on or Before September 20, 1994 (Subpart Cb)	No
Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (Subpart Cc)	No
Emission Guidelines and Compliance Times for Sulfuric Acid Production Plants (Subpart Cd)	No
Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators (Subpart Ce)	No
Fossil fuel-fired Steam Generators (Subpart D)	No
Electric Utility Steam Generating Units (Subpart Da)	No
Industrial-Commercial-Institutional Steam Generating Units (Subpart Db)	No
Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc)	No, Applicability to existing operations addressed in previous applications
Incinerators (Subpart E)	No
Municipal waste combustors (Subpart Ea)	No
Standards of Performance for Municipal Waste Combustors for Which Construction is Commenced After September 24, 1994 (Subpart Eb)	No
Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996 (Subpart Ec)	No
Portland cement plants (Subpart F)	No
Nitric Acid Plants (Subpart G)	No
Sulfuric Acid Plants (Subpart H)	No
Asphalt Concrete Plants (Subpart I)	No
Petroleum refineries (Subpart J)	No
Storage Vessels for Petroleum Liquids--for Construction, Reconstruction, or Modification, Commenced after June 11, 1973, and prior to May 19, 1978 (Subpart K)	No
Storage Vessels for Petroleum Liquids--for Construction, Reconstruction, or Modification, Commenced after May 18, 1978, and Prior to July 23, 1984 (Subpart Ka)	No
Volatile Organic Liquid Storage Vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984 (Subpart Kb)	No
Secondary Lead Smelters (Subpart L)	No
Secondary Brass and Bronze Ingot Production Plants (Subpart M)	No
Iron and Steel Plants (Primary Emissions from Basic Oxygen Furnaces Constructed after June 11, 1973) (Subpart N)	No
Iron and steel plants (secondary emissions from basic oxygen furnaces constructed after	No

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Table 4-1 **Applicable and Non-Applicable New Source Performance Standards (40 CFR Part 60)**

Rule Description - 40 CFR Part 60 - New Source Performance Standards	Applicable?
January 20, 1983) (Subpart Na)	
Sewage Treatment Plants (Subpart O)	No
Primary Smelters: Copper (Subpart P)	No
Primary Smelters: Zinc (Subpart Q)	No
Primary Smelters: Lead (Subpart R)	No
Primary Aluminum Reduction Plants (Subpart S)	No
Wet process Phosphoric Acid Plants (Subpart T)	No
Superphosphoric Acid Plants (Subpart U)	No
Diammonium Phosphate Plants (Subpart V)	No
Triple Superphosphate Plants (Subpart W)	No
Granular Triple Superphosphate Storage Facilities (Subpart X)	No
Coal Preparation Plants (Subpart Y)	No
Ferroalloy Production Facilities (Subpart Z)	No
Steel Plants: Electric Arc Furnaces (Subpart AA)	No
Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels constructed after August 17, 1983 (Subpart AAa)	No
Kraft Pulp Mills (Subpart BB)	No
Glass Manufacturing Plants (Subpart CC)	No
Grain Elevators (Subpart DD)	No
Surface Coating of Metal Furniture (Subpart EE)	No
Stationary Gas Turbines (Subpart GG)	No
Lime Manufacturing Plants (Subpart HH)	No
Lead-acid Battery Manufacturing Plants (Subpart KK)	No
Metallic Mineral Processing Plants (Subpart LL)	No
Automobile and Light-duty Truck Surface Coating Operations (Subpart MM)	No
Phosphate Rock Plants (Subpart NN)	No
Ammonium Sulfate Manufacture Plants (Subpart PP)	No
Graphic Arts Industry: Publication Rotogravure Printing (Subpart QQ)	No
Pressure Sensitive Tape and Label Surface Coating Operations (Subpart RR)	No
Industrial Surface Coating: Large Appliances (Subpart SS)	No
Metal Coil Surface Coating (Subpart TT)	No
Asphalt processing and asphalt roofing manufacture (Subpart UU)	No
Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (Subpart VV)	No
Beverage Can Surface Coating Industry (Subpart WW)	No
Bulk Gasoline Terminals (Subpart XX)	No
New Residential Wood Heaters (Subpart AAA)	No
Rubber Tire Manufacturing Industry (Subpart BBB)	No
Polymer Manufacturing Industry (Subpart DDD)	No
Flexible Vinyl and Urethane Coating and Printing (Subpart FFF)	No
Equipment Leaks of VOC in Petroleum Refineries (Subpart GGG)	No
Synthetic Fiber Production Facilities (Subpart HHH)	No
Synthetic Organic Chemical Manufacturing Industry Air Oxidation Unit Processes (Subpart III)	No
Petroleum Dry Cleaners (Subpart JJJ)	No
Onshore Natural Gas Processing Plants (Subpart KKK)	No
Onshore Natural Gas Processing: SO ₂ Emissions (Subpart LLL)	No
Synthetic Organic Chemical Manufacturing Industry Distillation Operations (Subpart NNN)	No
Nonmetallic Mineral Processing Plants (Subpart OOO)	No
Wool Fiberglass Insulation Manufacturing Plants (Subpart PPP)	No
Petroleum Refinery Wastewater System VOC Emissions (Subpart QQQ)	No
Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes (Subpart RRR)	No
Magnetic Tape Coating Facilities (Subpart SSS)	No
Industrial surface coating: Plastic parts for business machines (Subpart TTT)	No
Calciners and Dryers in Mineral Industries (Subpart UUU)	No
Polymeric Coating of Supporting Substrates Facilities (Subpart VVV)	No
Standards of Performance for Municipal Solid Waste Landfills (Subpart WWW)	No

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Table 4-1 **Applicable and Non-Applicable New Source Performance Standards (40 CFR Part 60)**

Rule Description - 40 CFR Part 60 - New Source Performance Standards	Applicable?
Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (Subpart AAAA)	No
Subpart BBBB - Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999	No
Subpart CCCC -- Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001	No
Subpart DDDD -- Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction On or Before November 30, 1999	No

Applicable and Inapplicable National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)

Table 4-2 Applicable and Inapplicable National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)

Rule Description - 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants	Applicable?
Subpart A--General Provisions.	No
Subpart B--Radon Emissions from Underground Uranium Mines.	No
Subpart C--Beryllium.	No
Subpart D--Beryllium Rocket Motor Firing.	No
Subpart E--Mercury.	No
Subpart F--Vinyl Chloride.	No
Subpart H--Emissions of Radionuclides other than Radon from Department of Energy Facilities.	No
Subpart I--Radionuclide Emissions from Facilities Licensed by the Nuclear Regulatory Commission and Federal Facilities not covered by Subpart H.	No
Subpart J--Equipment Leaks (Fugitive Emission Sources) of Benzene.	No
Subpart K--Radionuclide Emissions from Elemental Phosphorus Plants.	No
Subpart L--Benzene Emissions from Coke By-Product Recovery Plants.	No
Subpart M--Asbestos.	No
Subpart N--Inorganic Arsenic Emissions from Glass Manufacturing Plants.	No
Subpart O--Inorganic Arsenic Emissions from Primary Copper Smelters.	No
Subpart P--Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities.	No
Subpart Q--Radon Emissions from Department of Energy Facilities.	No
Subpart R--Radon Emission from Phosphogypsum Stacks.	No
Subpart T--Radon Emissions from the Disposal of Uranium Mill Tailings.	No
Subpart V--Equipment Leaks (Fugitive Emission Sources).	No
Subpart W--Radon Emissions from Operating Mill Tailings.	No
Subpart Y--Benzene Emissions from Benzene Storage Vessels.	No
Subpart BB--Benzene Emission from Benzene Transfer Operations.	No
Subpart FF--Benzene Waste Operations.	No

Applicable and Inapplicable National Emission Standard for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)

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Table 4-3 Applicable and Inapplicable National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63)

Rule Description - 40 CFR Part 63- National Emission Standards for Hazardous Air Pollutants for Source Categories	Applicable? (Explanation)
Subpart A – General Provisions	No – not in source category
Subpart F – SOCFI	No – not in source category
Subpart G – SOCFI – Process Vents, Storage Vessels, Transfer Operations	No – not in source category
Subpart H – SOCFI – Equipment Leaks	No – not in source category
Subpart I – Certain Processes Subject to the Negotiated Regulation for Equipment Leaks	No – not in source category
Subpart J – Polyvinyl Chloride and Copolymers Production	No – not in source category
Subpart L – Coke Oven Batteries	No – not in source category
Subpart M – Dry Cleaning Facilities Using Perchloroethylene	No – not in source category
Subpart N – Hard and Decorative Electroplating and Anodizing	No – not in source category
Subpart O – Ethylene Oxide Sterilization	No – not in source category
Subpart Q – Industrial Process Cooling Towers	No – not in source category
Subpart R – Gasoline Distribution (Bulk Gasoline Terminals and Pipeline Breakout Stations)	No – not in source category
Subpart S – Pulp and Paper Industry	No – not in source category
Subpart T – Halogenated Solvent Cleaning	No – not in source category
Subpart U – Group I Polymers and Resins	No – not in source category
Subpart W – Epoxy Resins and Non-Nylon Polyamides Production	No – not in source category
Subpart X – Secondary Lead Smelting	No – not in source category
Subpart Y – Marine Tank Vessel Loading Operations	No – not in source category
Subpart AA – National Emission Standards for Hazardous Air Pollutants From Phosphoric Acid Manufacturing Plants	No – not in source category
Subpart BB – National Emission Standards for Hazardous Air Pollutants From Phosphate Fertilizers Production Plants	No – not in source category;
Subpart CC – National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries	No – not in source category
Subpart DD – National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations	No – not in source category
Subpart EE – National Emission Standards for Magnetic Tape Manufacturing Operations	No – not in source category
Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities	No – not in source category
Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities	No – not in source category
Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)	No – not in source category

Rule Description - 40 CFR Part 63- National Emission Standards for Hazardous Air Pollutants for Source Categories	Applicable? (Explanation)
<u>Miscellaneous Coating Manufacturing</u>	No – not in source category
<u>Mercury Cell Chlor-Alkali Plants</u>	No – not in source category
<u>Brick and Structural Clay Products Manufacturing</u>	No – not in source category
<u>Clay Ceramics Manufacturing</u>	No – not in source category
<u>Asphalt Processing and Asphalt Roofing Manufacturing</u>	No – not in source category
<u>Flexible Polyurethane Foam Fabrication Operations</u>	No – not in source category
<u>Hydrochloric Acid Production</u>	No – not in source category
<u>Engine Test Cells/Standards</u>	No – not in source category
	No – not in source category
<u>Taconite Iron Ore Processing</u>	No – not in source category
<u>Refractory Products Manufacturing</u>	No – not in source category
<u>Primary Magnesium Refining</u>	No – not in source category

Other or Newer Federal Standards Applicability

The two new federal standards that apply to the proposed action are the federal NESHAPS Subparts ZZZZ for stationary engines, and Subpart JJJJJ Boiler MACT regulations.

Subpart ZZZZ applies to the facility's 270HP emergency fire water pump. That emergency engine has a non-resettable usage timer, and has historically been permitted as an emergency engine by Idaho DEQ. The Subpart ZZZZ applicability and permit text are already in the current facility Title V permit and its SOB.

The section below details the entire Boiler MACT regulation, with line by line applicability documented in red text. This information is duplicated in the Word document Subpart JJJJJ FRA.docx.

What This Subpart Covers



§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 Zurn 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 not a 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

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

The boiler is an affected source and is an existing source constructed in 1978

(c) 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.

(d) 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.

(e) 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.

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This does not apply. The boiler is a biomass-fired boiler.

(f) 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]

The permittee does not have a Part 70 permit. This is an administrative requirement that generally applies.

§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.

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

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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.

(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. It is not any of the following:

- **New coal-fired boilers with heat input capacity of 30 million British thermal units per hour (MMBtu/hr) or greater that do not meet the definition of limited-use boiler,**
- **New coal-fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of limited-use boiler,**
- **New biomass fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler**
- **New biomass fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler**
- **New oil-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of seasonal boiler or limited-use boiler**
- **Existing coal-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of limited-use boiler**

(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 an energy assessment.

(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 (3) of subpart DDDD.

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

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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

EMISSION LIMITS, WORK PRACTICE STANDARDS, EMISSION REDUCTION MEASURES, AND MANAGEMENT PRACTICES

§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.

§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. It is not any of the following:

- **New coal-fired boilers with heat input capacity of 30 million British thermal units per hour (MMBtu/hr) or greater that do not meet the definition of limited-use boiler,**
- **New coal-fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of limited-use boiler,**
- **New biomass fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler**
- **New biomass fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler**

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- **New oil-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of seasonal boiler or limited-use boiler**

- **Existing coal-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of limited-use boiler.**

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

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

40 CFR 63.11201(d) generally applies.

GENERAL COMPLIANCE REQUIREMENTS

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

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(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(c)(1)(ii), (c)(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.

INITIAL COMPLIANCE REQUIREMENTS

§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

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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(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.

(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 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 PM emission limit under this subpart and that do not use a post-combustion technology (except a wet scrubber) to reduce particulate matter (PM) or sulfur dioxide emissions, 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 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.

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

(f) 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(f) does not apply. The Boiler is not new or reconstructed affected boiler.

(g) For affected boilers that ceased burning solid waste consistent with §63.11196(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(g) does not apply. The Boiler is not an affected boiler that ceased burning solid waste consistent with 40 CFR 63.11196(g).

(h) 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 JJJJJJ or the boiler becoming subject to subpart JJJJJJ, 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(h) does not apply. The Boiler is not new or reconstructed affected boiler.

(i) 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 (i)(1) through (3) of this section.

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(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(i) does apply. The Boiler is an existing boiler located at a synthetic minor class facility.

(j) 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 (j)(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.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7507, Feb. 1, 2013]

40 CFR 63.11210(h) 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 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

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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 apply. The permittee has established a wet scrubber media flow rate which is locked in via the facility's CAM plan and incorporated in the facility's air permit.

(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 operated 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.

$$P_{90} = \text{mean} + (SD * t) \quad (\text{Eq. 1})$$

Where:

P_{90} = 90th percentile confidence level mercury concentration, in pounds per million Btu.

mean = Arithmetic average of the fuel mercury concentration in the fuel samples analyzed according to §63.11213, in units of pounds per million Btu.

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.

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]

40 CFR 63.11212(a) through (e) do not apply. The Boiler is not subject to an applicable emission limit.

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

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

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

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

40 CFR 63.11213(a) through (c) do not apply. The Boiler is not subject to an applicable emission limit 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?

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(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 §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

40 CFR 63.11214 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 §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

40 CFR 63.11214(b) Does apply. The Boiler is an existing biomass-fired boiler.

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of your facility.

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]

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

CONTINUOUS COMPLIANCE REQUIREMENTS

§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 (d) 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. The Boiler is not subject to an applicable emission limit.

(b) 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 but must continue to comply with all applicable operating limits and monitoring requirements. If your initial performance test results show that your PM emissions are greater than half of the PM emission limit, you must conduct subsequent performance tests as specified in paragraph (a) of this section.

40 CFR 63.11220(b) does not apply. 40 CFR 63.112213(a) through (c) do not apply. The Boiler is not subject to an applicable emission limit and, therefore, not subject to the related required fuel analyses.

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(c) 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 (c)(1) and (2) 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) 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 but must continue to comply with all applicable operating limits and monitoring requirements.

(2) When demonstrating initial 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(c), (c)(1) and (c)(2) do not apply. 40 CFR 63.11221(a) through (e) do not apply. The Boiler is not subject to an applicable emission limit.

(d) For existing affected boilers that have not operated 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.

[78 FR 7508, Feb. 1, 2013]

§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. 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.

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(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.

[76 FR 15591, Mar. 21, 2011, as amended at 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

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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 63.11221(d) 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.

40 CFR 63.11222(b) does not apply because the boiler is not subject to an emission or operating limit and 40 CFR 63.11221(a)(1) applies.

§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.

40 CFR 63.11223(a) does apply because the Boiler is an existing biomass boiler subject to the tune-up of 40 CFR 63.11214(b).

(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.

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(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) applies

(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.

40 CFR 63.11223(c) does 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.

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

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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.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7509, Feb. 1, 2013]

40 CFR 63.11223(g) does not apply because the Boiler is not subject to an emission limit in 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 1 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 §63.11211(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.

$$10\text{-day average} = \frac{\sum_{i=1}^n H_{pvi}}{n} \quad (\text{Eq. 21})$$

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 a CO 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 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).

(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) and (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.

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(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) and (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.

$$\text{30-day average} = \frac{\sum_{i=1}^n Hpvi}{n} \quad [\text{Eq. 3}]$$

Where:

$Hpvi$ = 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 §63.11221(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 §63.11221(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.

(1) 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.

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(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 operating 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) apply.

(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.

(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) applies.

(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 must conduct a performance stack test. 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) generally applies. The compliance date is 03/21/14. 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

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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 in §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) generally applies. The compliance date is 03/21/14. 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 an emission test.

(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 §63.11223 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)(1) 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."

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(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 63.225(b)(2)(ii) does not apply because the boiler is not a solid waste incineration unit. 40 CFR 63.225(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)(1) 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(a).

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 is required to conduct an energy assessment.

(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.

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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 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 corrective action taken (if applicable).

40 CFR 63.11225(c)(6) does not apply. The requirements of 40 CFR 63.11221 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. 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 generally applies.

(e)(1) Within 60 days after the date of completing each performance test (defined in §63.2) as required by this subpart you must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) ([see *http://www.epa.gov/ttn/chief/ert/index.html*](http://www.epa.gov/ttn/chief/ert/index.html)). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test in paper submissions to the Administrator at the appropriate address listed in §63.13.

40 CFR 63.11225(e)(1) does 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 test as defined in §63.2, you must submit relative accuracy test audit (RATA) data to EPA's CDX by using CEDRI in accordance with paragraph (e)(1) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, the owner or operator shall submit the results of the performance evaluation in paper submissions to the Administrator at the appropriate address listed in §63.13.

40 CFR 63.11225(e)(2) does 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 subpart JJJJJJ, in the boiler becoming subject to subpart JJJJJJ, or in the boiler switching out of subpart JJJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, 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.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7511, Feb. 1, 2013].

40 CFR 63.11225(g), (g)(1), and (g)(2) is an administrative requirement that generally applies.

§63.11226 Affirmative defense for violation of emission standards during malfunction.

In response to an action to enforce the standards set forth in §63.11201 you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(a) *Assertion of affirmative defense.* To establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (b) of this section, and must prove by a preponderance of evidence that:

(1) The violation:

(i) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and

(ii) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(iii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(iv) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(2) Repairs were made as expeditiously as possible when a violation occurred; and

(3) The frequency, amount, and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and

(4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and

(6) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and

(8) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and

(9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

(b) *Report.* The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (a) of this section. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

[78 FR 7513, Feb. 1, 2013]

40 CFR 63.11226 is an administrative requirement that generally applies.

OTHER REQUIREMENTS AND INFORMATION

§63.11235 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.

40 CFR 63.11235 is an administrative requirement that generally applies.

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§63.11236 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or an administrator such as your state, local, or tribal agency. If the EPA Administrator has delegated authority to your state, local, or tribal agency, then that agency has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your state, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraphs (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.

(c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emission standard and work practice standards in §63.11223(a).

(2) Approval of alternative opacity emission standard under §63.6(h)(9).

(3) Approval of major change to test methods under §63.7(e)(2)(ii) and (f). A “major change to test method” is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f). A “major change to monitoring” is defined in §63.90.

(5) Approval of major change to recordkeeping and reporting under §63.10(f). A “major change to recordkeeping/reporting” is defined in §63.90.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7513, Feb. 1, 2013]

40 CFR 63.11236 is an administrative requirement that generally applies.

§63.11237 What definitions apply to this subpart?

Terms used in this subpart are defined in the Clean Air Act, in §63.2 (the General Provisions), and in this section as follows:

10-day rolling average means the arithmetic mean of all valid hours of data from 10 successive operating days, except for periods of startup and shutdown and periods when the unit is not operating.

30-day rolling average means the arithmetic mean of all valid hours of data from 30 successive operating days, except for periods of startup and shutdown and periods when the unit is not operating.

Affirmative defense means, in the context of an enforcement proceeding, a response or defense put forward by a defendant, regarding which the defendant has the burden of proof, and the merits of which are independently and objectively evaluated in a judicial or administrative proceeding.

Annual heat input means the heat input for the 12 months preceding the compliance demonstration.

Bag leak detection system means a group of instruments that are capable of monitoring particulate matter loadings in the exhaust of a fabric filter (*i.e.*, baghouse) in order to detect bag failures. A bag leak detection system includes, but is not limited to, an instrument that operates on electrodynamic, triboelectric, light scattering, light transmittance, or other principle to monitor relative particulate matter loadings.

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Biodiesel means a mono-alkyl ester derived from biomass and conforming to ASTM D6751-11b, Standard Specification for Biodiesel Fuel Blend Stock (B100) for Middle Distillate Fuels (incorporated by reference, see §63.14).

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings); animal manure, including litter and other bedding materials; vegetative agricultural and silvicultural materials, such as logging residues (slash), nut and grain hulls and chaff (e.g., almond, walnut, peanut, rice, and wheat), bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds. This definition of biomass is not intended to suggest that these materials are or are not solid waste.

Biomass subcategory includes any boiler that burns any biomass and is not in the coal subcategory.

Boiler means an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water. Controlled flame combustion refers to a steady-state, or near steady-state, process wherein fuel and/or oxidizer feed rates are controlled. A device combusting solid waste, as defined in §241.3 of this chapter, is not a boiler unless the device is exempt from the definition of a solid waste incineration unit as provided in section 129(g)(1) of the Clean Air Act. Waste heat boilers, process heaters, and autoclaves are excluded from the definition of *Boiler*.

Boiler system means the boiler and associated components, such as, feedwater systems, combustion air systems, fuel systems (including burners), blowdown systems, combustion control systems, steam systems, and condensate return systems, directly connected to and serving the energy use systems.

Calendar year means the period between January 1 and December 31, inclusive, for a given year.

Coal means all solid fuels classifiable as anthracite, bituminous, sub-bituminous, or lignite by the American Society for Testing and Materials in ASTM D388 (incorporated by reference, see §63.14), coal refuse, and petroleum coke. For the purposes of this subpart, this definition of "coal" includes synthetic fuels derived from coal including, but not limited to, solvent-refined coal, coal-oil mixtures, and coal-water mixtures. Coal derived gases are excluded from this definition.

Coal subcategory includes any boiler that burns any solid fossil fuel and no more than 15 percent biomass on an annual heat input basis.

Commercial boiler means a boiler used in commercial establishments such as hotels, restaurants, and laundries to provide electricity, steam, and/or hot water.

Common stack means the exhaust of emissions from two or more affected units through a single flue. Affected units with a common stack may each have separate air pollution control systems located before the common stack, or may have a single air pollution control system located after the exhausts come together in a single flue.

Daily block average means the arithmetic mean of all valid emission concentrations or parameter levels recorded when a unit is operating measured over the 24-hour period from 12 a.m. (midnight) to 12 a.m. (midnight), except for periods of startup and shutdown and periods when the unit is not operating.

Deviation (1) Means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

(i) Fails to meet any applicable requirement or obligation established by this subpart including, but not limited to, any emission limit, operating limit, or work practice standard; or

(ii) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit.

(2) A deviation is not always a violation.

Distillate oil means fuel oils that contain 0.05 weight percent nitrogen or less and comply with the specifications for fuel oil numbers 1 and 2, as defined by the American Society of Testing and Materials in ASTM D396 (incorporated by reference, see §63.14) or diesel fuel oil numbers 1 and 2, as defined by the American Society for Testing and Materials in ASTM D975 (incorporated by reference, see §63.14), kerosene, and biodiesel as defined by the American Society of Testing and Materials in ASTM D6751-11b (incorporated by reference, see §63.14).

Dry scrubber means an add-on air pollution control system that injects dry alkaline sorbent (dry injection) or sprays an alkaline sorbent (spray dryer) to react with and neutralize acid gas in the exhaust stream forming a dry powder material. Sorbent injection systems used as control devices in fluidized bed boilers and process heaters are included in this definition. A dry scrubber is a dry control system.

Electric boiler means a boiler in which electric heating serves as the source of heat. Electric boilers that burn gaseous or liquid fuel during periods of electrical power curtailment or failure are included in this definition.

Electric utility steam generating unit (EGU) means a fossil fuel-fired combustion unit of more than 25 megawatts that serves a generator that produces electricity for sale. A fossil fuel-fired unit that cogenerates steam and electricity and supplies more than one-third of its potential electric output capacity and more than 25 megawatts electrical output to any utility power distribution system for sale is considered an electric utility steam generating unit. To be "capable of combusting" fossil fuels, an EGU would need to have these fuels allowed in their operating permits and have the appropriate fuel handling facilities on-site or otherwise available (e.g., coal handling equipment, including coal storage area, belts and conveyers, pulverizers, etc.; oil storage facilities). In addition, fossil fuel-fired EGU means any EGU that fired fossil fuel for more than 10.0 percent of the average annual heat input in any 3 consecutive calendar years or for more than 15.0 percent of the annual heat input during any one calendar year after April 16, 2015.

Electrostatic precipitator (ESP) means an add-on air pollution control device used to capture particulate matter by charging the particles using an electrostatic field, collecting the particles using a grounded collecting surface, and transporting the particles into a hopper. An electrostatic precipitator is usually a dry control system.

Energy assessment means the following for the emission units covered by this subpart:

(1) The energy assessment for facilities with affected boilers with less than 0.3 trillion Btu per year (TBtu/year) heat input capacity 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.

(2) The energy assessment for facilities with affected boilers with 0.3 to 1.0 TBtu/year heat input capacity will be 24 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 33 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 a 24-hour energy assessment.

(3) The energy assessment for facilities with affected boilers with greater than 1.0 TBtu/year heat input capacity will be up to 24 on-site technical labor hours in length for the first TBtu/year plus 8 on-site

technical labor hours for every additional 1.0 TBtu/year not to exceed 160 on-site technical hours, 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 20 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.

(4) The on-site energy use system(s) serving as the basis for the percent of affected boiler(s) energy production, as applicable, in paragraphs (1), (2), and (3) of this definition may be segmented by production area or energy use area as most logical and applicable to the specific facility being assessed (e.g., product X manufacturing area; product Y drying area; Building Z).

Energy management program means a program that includes a set of practices and procedures designed to manage energy use that are demonstrated by the facility's energy policies, a facility energy manager and other staffing responsibilities, energy performance measurement and tracking methods, an energy saving goal, action plans, operating procedures, internal reporting requirements, and periodic review intervals used at the facility. Facilities may establish their program through energy management systems compatible with ISO 50001.

Energy use system (1) Includes the following systems located on the site of the affected boiler that use energy provided by the boiler:

(i) Process heating; compressed air systems; machine drive (motors, pumps, fans); process cooling; facility heating, ventilation, and air conditioning systems; hot water systems; building envelop; and lighting; or

(ii) Other systems that use steam, hot water, process heat, or electricity, provided by the affected boiler.

(2) Energy use systems are only those systems using energy clearly produced by affected boilers.

Equivalent means the following only as this term is used in Table 5 to this subpart:

(1) An equivalent sample collection procedure means a published voluntary consensus standard or practice (VCS) or

EPA method that includes collection of a minimum of three composite fuel samples, with each composite consisting of a minimum of three increments collected at approximately equal intervals over the test period.

(2) An equivalent sample compositing procedure means a published VCS or EPA method to systematically mix and obtain a representative subsample (part) of the composite sample.

(3) An equivalent sample preparation procedure means a published VCS or EPA method that: Clearly states that the standard, practice or method is appropriate for the pollutant and the fuel matrix; or is cited as an appropriate sample preparation standard, practice or method for the pollutant in the chosen VCS or EPA determinative or analytical method.

(4) An equivalent procedure for determining heat content means a published VCS or EPA method to obtain gross calorific (or higher heating) value.

(5) An equivalent procedure for determining fuel moisture content means a published VCS or EPA method to obtain moisture content. If the sample analysis plan calls for determining mercury using an aliquot of the dried sample, then the drying temperature must be modified to prevent vaporizing this metal. On the other hand, if metals analysis is done on an "as received" basis, a separate aliquot can be dried to determine moisture content and the mercury concentration mathematically adjusted to a dry basis.

(6) An equivalent mercury determinative or analytical procedure means a published VCS or EPA method that clearly states that the standard, practice, or method is appropriate for mercury and the fuel matrix and has a published detection limit equal or lower than the methods listed in Table 5 to this subpart for the same purpose.

Fabric filter means an add-on air pollution control device used to capture particulate matter by filtering gas streams through filter media, also known as a baghouse. A fabric filter is a dry control system.

Federally enforceable means all limitations and conditions that are enforceable by the EPA Administrator, including, but not limited to, the requirements of 40 CFR parts 60, 61, 63, and 65, requirements within any applicable state implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

Fluidized bed boiler means a boiler utilizing a fluidized bed combustion process that is not a pulverized coal boiler.

Fluidized bed combustion means a process where a fuel is burned in a bed of granulated particles, which are maintained in a mobile suspension by the forward flow of air and combustion products.

Fuel type means each category of fuels that share a common name or classification. Examples include, but are not limited to, bituminous coal, sub-bituminous coal, lignite, anthracite, biomass, distillate oil, residual oil. Individual fuel types received from different suppliers are not considered new fuel types.

Gaseous fuels includes, but is not limited to, natural gas, process gas, landfill gas, coal derived gas, refinery gas, hydrogen, and biogas.

Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Heat input means heat derived from combustion of fuel in a boiler and does not include the heat input from preheated combustion air, recirculated flue gases, returned condensate, or exhaust gases from other sources such as gas turbines, internal combustion engines, kilns.

Hot water heater means a closed vessel with a capacity of no more than 120 U.S. gallons in which water is heated by combustion of gaseous, liquid, or biomass fuel and hot water is withdrawn for use external to the vessel. Hot water boilers (*i.e.*, not generating steam) combusting gaseous, liquid, or biomass fuel with a heat input capacity of less than 1.6 million Btu per hour are included in this definition. The 120 U.S. gallon capacity threshold to be considered a hot water heater is independent of the 1.6 million Btu per hour heat input capacity threshold for hot water boilers. Hot water heater also means a tankless unit that provides on-demand hot water.

Hourly average means the arithmetic average of at least four CMS data values representing 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.

Industrial boiler means a boiler used in manufacturing, processing, mining, and refining or any other industry to provide steam, hot water, and/or electricity.

Institutional boiler means a boiler used in institutional establishments such as, but not limited to, medical centers, nursing homes, research centers, institutions of higher education, elementary and secondary schools, libraries, religious establishments, and governmental buildings to provide electricity, steam, and/or hot water.

Limited-use boiler means any boiler that burns any amount of solid or liquid fuels and has a federally enforceable average annual capacity factor of no more than 10 percent.

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Liquid fuel includes, but is not limited to, distillate oil, residual oil, any form of liquid fuel derived from petroleum, used oil meeting the specification in 40 CFR 279.11, liquid biofuels, biodiesel, and vegetable oil, and comparable fuels as defined under 40 CFR 261.38.

Load fraction means the actual heat input of a boiler divided by heat input during the performance test that established the minimum sorbent injection rate or minimum activated carbon injection rate, expressed as a fraction (e.g., for 50 percent load the load fraction is 0.5).

Minimum activated carbon injection rate means load fraction multiplied by the lowest hourly average activated carbon injection rate measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable emission limit.

Minimum oxygen level means the lowest hourly average oxygen level measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable carbon monoxide emission limit.

Minimum scrubber liquid flow rate means the lowest hourly average scrubber liquid flow rate (e.g., to the particulate matter scrubber) measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable emission limit.

Minimum scrubber pressure drop means the lowest hourly average scrubber pressure drop measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable emission limit.

Minimum total secondary electric power means the lowest hourly average total secondary electric power determined from the values of secondary voltage and secondary current to the electrostatic precipitator measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable emission limits.

Natural gas means:

(1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or

(2) Liquefied petroleum gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §63.14); or

(3) A mixture of hydrocarbons that maintains a gaseous state at ISO conditions (i.e., a temperature of 288 Kelvin, a relative humidity of 60 percent, and a pressure of 101.3 kilopascals). Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 35 and 41 megajoules (MJ) per dry standard cubic meter (950 and 1,100 Btu per dry standard cubic foot); or

(4) Propane or propane-derived synthetic natural gas. Propane means a colorless gas derived from petroleum and natural gas, with the molecular structure C₃H₈.

Oil subcategory includes any boiler that burns any liquid fuel and is not in either the biomass or coal subcategories. Gas-fired boilers that burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing are not included in this definition. Periodic testing on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

Opacity means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background.

Operating day means a 24-hour period between 12 midnight and the following midnight during which any fuel is combusted at any time in the boiler unit. It is not necessary for fuel to be combusted for the entire 24-hour period.

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Oxygen analyzer system means all equipment required to determine the oxygen content of a gas stream and used to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location. This definition includes oxygen trim systems.

Oxygen trim system means a system of monitors that is used to maintain excess air at the desired level in a combustion device. A typical system consists of a flue gas oxygen and/or carbon monoxide monitor that automatically provides a feedback signal to the combustion air controller.

Particulate matter (PM) means any finely divided solid or liquid material, other than uncombined water, as measured by the test methods specified under this subpart, or an approved alternative method.

Performance testing means the collection of data resulting from the execution of a test method used (either by stack testing or fuel analysis) to demonstrate compliance with a relevant emission standard.

Period of gas curtailment or supply interruption means a period of time during which the supply of gaseous fuel to an affected boiler is restricted or halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas due to normal market fluctuations not during periods of supplier delivery restriction does not constitute a period of natural gas curtailment or supply interruption. On-site gaseous fuel system emergencies or equipment failures qualify as periods of supply interruption when the emergency or failure is beyond the control of the facility.

Process heater means an enclosed device using controlled flame, and the unit's primary purpose is to transfer heat indirectly to a process material (liquid, gas, or solid) or to a heat transfer material (e.g., glycol or a mixture of glycol and water) for use in a process unit, instead of generating steam. Process heaters are devices in which the combustion gases do not come into direct contact with process materials. Process heaters include units that heat water/water mixtures for pool heating, sidewalk heating, cooling tower water heating, power washing, or oil heating.

Qualified energy assessor means:

(1) Someone who has demonstrated capabilities to evaluate energy savings opportunities for steam generation and major energy using systems, including, but not limited to:

- (i) Boiler combustion management.
- (ii) Boiler thermal energy recovery, including
 - (A) Conventional feed water economizer,
 - (B) Conventional combustion air preheater, and
 - (C) Condensing economizer.
- (iii) Boiler blowdown thermal energy recovery.
- (iv) Primary energy resource selection, including
 - (A) Fuel (primary energy source) switching, and
 - (B) Applied steam energy versus direct-fired energy versus electricity.
- (v) Insulation issues.
- (vi) Steam trap and steam leak management.

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(vii) Condensate recovery.

(viii) Steam end-use management.

(2) Capabilities and knowledge includes, but is not limited to:

(i) Background, experience, and recognized abilities to perform the assessment activities, data analysis, and report preparation.

(ii) Familiarity with operating and maintenance practices for steam or process heating systems.

(iii) Additional potential steam system improvement opportunities including improving steam turbine operations and reducing steam demand.

(iv) Additional process heating system opportunities including effective utilization of waste heat and use of proper process heating methods.

(v) Boiler-steam turbine cogeneration systems.

(vi) Industry specific steam end-use systems.

Regulated gas stream means an offgas stream that is routed to a boiler for the purpose of achieving compliance with a standard under another subpart of this part or part 60, part 61, or part 65 of this chapter.

Residential boiler means a boiler used to provide heat and/or hot water and/or as part of a residential combined heat and power system. This definition includes boilers located at an institutional facility (e.g., university campus, military base, church grounds) or commercial/industrial facility (e.g., farm) used primarily to provide heat and/or hot water for:

(1) A dwelling containing four or fewer families, or

(2) A single unit residence dwelling that has since been converted or subdivided into condominiums or apartments.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society of Testing and Materials in ASTM D396-10 (incorporated by reference, see §63.14(b)).

Responsible official means responsible official as defined in §70.2.

Seasonal boiler means a boiler that undergoes a shutdown for a period of at least 7 consecutive months (or 210 consecutive days) each 12-month period due to seasonal conditions, except for periodic testing. Periodic testing shall not exceed a combined total of 15 days during the 7-month shutdown. This definition only applies to boilers that would otherwise be included in the biomass subcategory or the oil subcategory.

Shutdown means the cessation of operation of a boiler for any purpose. Shutdown begins either when none of the steam or heat from the boiler is supplied for heating and/or producing electricity, or for any other purpose, or at the point of no fuel being fired in the boiler, whichever is earlier. Shutdown ends when there is no steam and no heat being supplied and no fuel being fired in the boiler.

Solid fossil fuel includes, but is not limited to, coal, coke, petroleum coke, and tire-derived fuel.

Solid fuel means any solid fossil fuel or biomass or bio-based solid fuel.

Startup means either the first-ever firing of fuel in a boiler for the purpose of supplying steam or heat for heating and/or producing electricity, or for any other purpose, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam or heat from the boiler is supplied for heating and/or producing electricity, or for any other purpose.

Temporary boiler means any gaseous or liquid fuel boiler that is designed to, and is capable of, being carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A boiler is not a temporary boiler if any one of the following conditions exists:

(1) The equipment is attached to a foundation.

(2) The boiler or a replacement remains at a location within the facility and performs the same or similar function for more than 12 consecutive months, unless the regulatory agency approves an extension. An extension may be granted by the regulating agency upon petition by the owner or operator of a unit specifying the basis for such a request. Any temporary boiler that replaces a temporary boiler at a location within the facility and performs the same or similar function will be included in calculating the consecutive time period unless there is a gap in operation of 12 months or more.

(3) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.

(4) The equipment is moved from one location to another within the facility but continues to perform the same or similar function and serve the same electricity, steam, and/or hot water system in an attempt to circumvent the residence time requirements of this definition.

Tune-up means adjustments made to a boiler in accordance with the procedures outlined in §63.11223(b).

Vegetable oil means oils extracted from vegetation.

Voluntary Consensus Standards (VCS) mean technical standards (e.g., materials specifications, test methods, sampling procedures, business practices) developed or adopted by one or more voluntary consensus bodies. EPA/Office of Air Quality Planning and Standards, by precedent, has only used VCS that are written in English. Examples of VCS bodies are: American Society of Testing and Materials (ASTM 100 Barr Harbor Drive, P.O. Box CB700, West Conshohocken, Pennsylvania 19428-B2959, (800) 262-1373, <http://www.astm.org>), American Society of Mechanical Engineers (ASME ASME, Three Park Avenue, New York, NY 10016-5990, (800) 843-2763, <http://www.asme.org>), International Standards Organization (ISO 1, ch. de la Voie-Creuse, Case postale 56, CH-1211 Geneva 20, Switzerland, +41 22 749 01 11, <http://www.iso.org/iso/home.htm>), Standards Australia (AS Level 10, The Exchange Centre, 20 Bridge Street, Sydney, GPO Box 476, Sydney NSW 2001, + 61 2 9237 6171 <http://www.stadards.org.au>), British Standards Institution (BSI, 389 Chiswick High Road, London, W4 4AL, United Kingdom, +44 (0)20 8996 9001, <http://www.bsigroup.com>), Canadian Standards Association (CSA 5060 Spectrum Way, Suite 100, Mississauga, Ontario L4W 5N6, Canada, 800-463-6727, <http://www.csa.ca>), European Committee for Standardization (CEN CENELEC Management Centre Avenue Marnix 17 B-1000 Brussels, Belgium +32 2 550 08 11, <http://www.cen.eu/cen>), and German Engineering Standards (VDI VDI Guidelines Department, P.O. Box 10 11 39 40002, Duesseldorf, Germany, +49 211 6214-230, <http://www.vdi.eu>). The types of standards that are not considered VCS are standards developed by: the United States, e.g., California (CARB) and Texas (TCEQ); industry groups, such as American Petroleum Institute (API), Gas Processors Association (GPA), and Gas Research Institute (GRI); and other branches of the U.S. government, e.g., Department of Defense (DOD) and Department of Transportation (DOT). This does not preclude EPA from using standards developed by groups that are not VCS bodies within their rule. When this occurs, EPA has done searches and reviews for VCS equivalent to these non-EPA methods.

Waste heat boiler means a device that recovers normally unused energy (i.e., hot exhaust gas) and converts it to usable heat. Waste heat boilers are also referred to as heat recovery steam generators.

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Waste heat boilers are heat exchangers generating steam from incoming hot exhaust gas from an industrial (e.g., thermal oxidizer, kiln, furnace) or power (e.g., combustion turbine, engine) equipment. Duct burners are sometimes used to increase the temperature of the incoming hot exhaust gas.

Wet scrubber means any add-on air pollution control device that mixes an aqueous stream or slurry with the exhaust gases from a boiler to control emissions of particulate matter or to absorb and neutralize acid gases, such as hydrogen chloride. A wet scrubber creates an aqueous stream or slurry as a byproduct of the emissions control process.

Work practice standard means any design, equipment, work practice, or operational standard, or combination thereof, which is promulgated pursuant to section 112(h) of the Clean Air Act.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7513, Feb. 1, 2013]

40 CFR 63.11237 is an administrative requirement that generally applies.

Table 1 to Subpart JJJJJ of Part 63—Emission Limits

As stated in §63.11201, you must comply with the following applicable emission limits:

If your boiler is in this subcategory . . .	For the following pollutants . . .	You must achieve less than or equal to the following emission limits, except during periods of startup and shutdown . . .
1. New coal-fired boilers with heat input capacity of 30 million British thermal units per hour (MMBtu/hr) or greater that do not meet the definition of limited-use boiler	a. PM (Filterable) b. Mercury c. CO	3.0E-02 pounds(lb) per million British thermal units (MMBtu) of heat input. 2.2E-05 lb per MMBtu of heat input. 420 parts per million (ppm) by volume on a dry basis corrected to 3 percent oxygen (3-run average or 10-day rolling average).
2. New coal-fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of limited-use boiler	a. PM (Filterable) b. Mercury c. CO	4.2E-01 lb per MMBtu of heat input. 2.2E-05 lb per MMBtu of heat input. 420 ppm by volume on a dry basis corrected to 3 percent oxygen (3-run average or 10-day rolling average).
3. New biomass-fired boilers with heat input capacity of 30 MMBtu/hr or greater that do not meet the definition of seasonal boiler or limited-use boiler	PM (Filterable)	3.0E-02 lb per MMBtu of heat input.
4. New biomass fired boilers with heat input capacity of between 10 and 30 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler	PM (Filterable)	7.0E-02 lb per MMBtu of heat input.

5. New oil-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of seasonal boiler or limited-use boiler	PM (Filterable)	3.0E-02 lb per MMBtu of heat input.
6. Existing coal-fired boilers with heat input capacity of 10 MMBtu/hr or greater that do not meet the definition of limited-use boiler	a. Mercury b. CO	2.2E-05 lb per MMBtu of heat input. 420 ppm by volume on a dry basis corrected to 3 percent oxygen.

[78 FR 7517, Feb. 1, 2013]

Table 1 does not apply. The facility's boiler is not in any referenced subcategories



Table 2 to Subpart JJJJJ of Part 63—Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory . . .	You must meet the following . . .
1. Existing or new coal-fired, new biomass-fired, or new oil-fired boilers (units with heat input capacity of 10 MMBtu/hr or greater)	Minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures. 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.
2. Existing coal-fired boilers with heat input capacity of less than 10 MMBtu/hr that do not meet the definition of limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
3. New coal-fired boilers with heat input capacity of less than 10 MMBtu/hr that do not meet the definition of limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct a tune-up of the boiler biennially as specified in §63.11223.
4. Existing oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.

seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	
5. New oil-fired boilers with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct a tune-up of the boiler biennially as specified in §63.11223.
6. Existing biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.
7. New biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio	Conduct a tune-up of the boiler biennially as specified in §63.11223.
8. Existing seasonal boilers	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
9. New seasonal boilers	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
10. Existing limited-use boilers	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
11. New limited-use boilers	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
12. Existing oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
13. New oil-fired boilers with heat input capacity of equal to or less than 5 MMBtu/hr	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
14. Existing coal-fired, biomass-fired, or oil-fired boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up	Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler every 5 years as specified in §63.11223.
15. New coal-fired, biomass-fired, or oil-fired boilers with an oxygen trim system that maintains an optimum air-	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.

to-fuel ratio that would otherwise be subject to a biennial tune-up	
16. Existing coal-fired, biomass-fired, or oil-fired boilers (units with heat input capacity of 10 MMBtu/hr and greater), not including limited-use boilers	Must have 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 the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:
	(1) A visual inspection of the boiler system,
	(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,
	(3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,
	(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
	(5) A list of major energy conservation measures that are within the facility's control,
	(6) A list of the energy savings potential of the energy conservation measures identified, and
	(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

[78 FR 7518, Feb. 1, 2013]

The requirements of Table 2 subcategories 6 and 16 (only) apply to the facility boiler



Table 3 to Subpart JJJJJJ of Part 63—Operating Limits for Boilers With Emission Limits

As stated in §63.11201, you must comply with the applicable operating limits:

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If you demonstrate compliance with applicable emission limits using . . .	You must meet these operating limits except during periods of startup and shutdown . . .
1. Fabric filter control	a. Maintain opacity to less than or equal to 10 percent opacity (daily block average); OR b. Install and operate a bag leak detection system according to §63.11224 and operate the fabric filter such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during each 6-month period.
2. Electrostatic precipitator control	a. Maintain opacity to less than or equal to 10 percent opacity (daily block average); OR b. Maintain the 30-day rolling average total secondary electric power of the electrostatic precipitator at or above the minimum total secondary electric power as defined in §63.11237.
3. Wet scrubber control	Maintain the 30-day rolling average pressure drop across the wet scrubber at or above the minimum scrubber pressure drop as defined in §63.11237 and the 30-day rolling average liquid flow rate at or above the minimum scrubber liquid flow rate as defined in §63.11237.
4. Dry sorbent or activated carbon injection control	Maintain the 30-day rolling average sorbent or activated carbon injection rate at or above the minimum sorbent injection rate or minimum activated carbon injection rate as defined in §63.11237. When your boiler operates at lower loads, multiply your sorbent or activated carbon injection rate by the load fraction (<i>e.g.</i> , actual heat input divided by the heat input during the performance stack test; for 50 percent load, multiply the injection rate operating limit by 0.5).
5. Any other add-on air pollution control type.	This option is for boilers that operate dry control systems. Boilers must maintain opacity to less than or equal to 10 percent opacity (daily block average).
6. Fuel analysis	Maintain the fuel type or fuel mixture (annual average) such that the mercury emission rate calculated according to §63.11211(c) are less than the applicable emission limit for mercury.
7. Performance stack testing	For boilers that demonstrate compliance with a performance stack test, maintain the operating load of each unit such that it does not exceed 110 percent of the average operating load recorded during the most recent performance stack test.
8. Oxygen analyzer system	For boilers subject to a CO emission limit that demonstrate compliance with an oxygen analyzer system as specified in §63.11224(a), maintain the 30-day rolling average oxygen level at or above the minimum oxygen level as defined in §63.11237. This requirement does not apply to units that install an oxygen trim system since these units will set the trim system to the level specified in §63.11224(a)(7).

[78 FR 7519, Feb. 1, 2013]

Though the facility has a wet scrubber, the requirements of Table 3 do not apply because the boiler is not subject to an emission limit in accordance with 40 CFR 63.11201(a).

†

Table 4 to Subpart JJJJJJ of Part 63—Performance (Stack) Testing Requirements

As stated in §63.11212, you must comply with the following requirements for performance (stack) test for affected sources:

To conduct a performance test for the following pollutant. . .	You must. . .	Using. . .
1. Particulate Matter	a. Select sampling ports location and the number of traverse points	Method 1 in appendix A-1 to part 60 of this chapter.
	b. Determine velocity and volumetric flow-rate of the stack gas	Method 2, 2F, or 2G in appendix A-2 to part 60 of this chapter.
	c. Determine oxygen and carbon dioxide concentrations of the stack gas	Method 3A or 3B in appendix A-2 to part 60 of this chapter, or ASTM D6522-00 (Reapproved 2005), ^a or ANSI/ASME PTC 19.10-1981. ^a
	d. Measure the moisture content of the stack gas	Method 4 in appendix A-3 to part 60 of this chapter.
	e. Measure the particulate matter emission concentration	Method 5 or 17 (positive pressure fabric filters must use Method 5D) in appendix A-3 and A-6 to part 60 of this chapter and a minimum 1 dscm of sample volume per run.
	f. Convert emissions concentration to lb/MMBtu emission rates	Method 19 F-factor methodology in appendix A-7 to part 60 of this chapter.
2. Mercury	a. Select sampling ports location and the number of traverse points	Method 1 in appendix A-1 to part 60 of this chapter.
	b. Determine velocity and volumetric flow-	Method 2, 2F, or 2G in appendix A-2 to part 60 of this chapter.

	rate of the stack gas	
	c. Determine oxygen and carbon dioxide concentrations of the stack gas	Method 3A or 3B in appendix A-2 to part 60 of this chapter, or ASTM D6522-00 (Reapproved 2005), ^a or ANSI/ASME PTC 19.10-1981. ^a
	d. Measure the moisture content of the stack gas	Method 4 in appendix A-3 to part 60 of this chapter.
	e. Measure the mercury emission concentration	Method 29, 30A, or 30B in appendix A-8 to part 60 of this chapter or Method 101A in appendix B to part 61 of this chapter or ASTM Method D6784-02. ^a Collect a minimum 2 dscm of sample volume with Method 29 of 101A per run. Use a minimum run time of 2 hours with Method 30A.
	f. Convert emissions concentration to lb/MMBtu emission rates	Method 19 F-factor methodology in appendix A-7 to part 60 of this chapter.
3. Carbon Monoxide	a. Select the sampling ports location and the number of traverse points	Method 1 in appendix A-1 to part 60 of this chapter.
	b. Determine oxygen and carbon dioxide concentrations of the stack gas	Method 3A or 3B in appendix A-2 to part 60 of this chapter, or ASTM D6522-00 (Reapproved 2005), ^a or ANSI/ASME PTC 19.10-1981. ^a
	c. Measure the moisture content of the stack gas	Method 4 in appendix A-3 to part 60 of this chapter.
	d. Measure the carbon monoxide emission concentration	Method 10, 10A, or 10B in appendix A-4 to part 60 of this chapter or ASTM D6522-00 (Reapproved 2005) ^a and a minimum 1 hour sampling time per run.

^aIncorporated by reference, see §63.14.

The requirements of Table 4 do not apply because there is no source test requirement on the boiler



Table 5 to Subpart JJJJJJ of Part 63—Fuel Analysis Requirements

As stated in §63.11213, you must comply with the following requirements for fuel analysis testing for affected sources:

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To conduct a fuel analysis for the following pollutant . . .	You must . . .	Using . . .
1. Mercury	a. Collect fuel samples	Procedure in §63.11213(b) or ASTM D2234/D2234M ^a (for coal) or ASTM D6323 ^a (for biomass) or equivalent.
	b. Compose fuel samples	Procedure in §63.11213(b) or equivalent.
	c. Prepare composited fuel samples	EPA SW-846-3050B ^a (for solid samples) or EPA SW-846-3020A ^a (for liquid samples) or ASTM D2013/D2013M ^a (for coal) or ASTM D5198 ^a (for biomass) or equivalent.
	d. Determine heat content of the fuel type	ASTM D5865 ^a (for coal) or ASTM E711 ^a (for biomass) or equivalent.
	e. Determine moisture content of the fuel type	ASTM D3173 ^a or ASTM E871 ^a or equivalent.
	f. Measure mercury concentration in fuel sample	ASTM D6722 ^a (for coal) or EPA SW-846-7471B ^a (for solid samples) or EPA SW-846-7470A ^a (for liquid samples) or equivalent.
	g. Convert concentrations into units of lb/MMBtu of heat content	

^aIncorporated by reference, see §63.14.

The requirements of Table 5 do not apply because there is no fuel analysis requirement on the boiler

†

Table 6 to Subpart JJJJJ of Part 63—Establishing Operating Limits

As stated in §63.11211, you must comply with the following requirements for establishing operating limits:

If you have an applicable emission limit for . . .	And your operating limits are based on . . .	You must . . .	Using . . .	According to the following requirements
1. PM or mercury	a. Wet scrubber	Establish site-specific minimum	Data from the pressure drop	(a) You must collect pressure drop and liquid

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	operating parameters	scrubber pressure drop and minimum scrubber liquid flow rate operating limits according to §63.11211(b)	and liquid flow rate monitors and the PM or mercury performance stack tests	flow rate data every 15 minutes during the entire period of the performance stack tests;
				(b) Determine the average pressure drop and liquid flow rate for each individual test run in the three-run performance stack test by computing the average of all the 15-minute readings taken during each test run.
	b. Electrostatic precipitator operating parameters	Establish a site-specific minimum total secondary electric power operating limit according to §63.11211(b)	Data from the secondary electric power monitors and the PM or mercury performance stack tests	(a) You must collect secondary electric power data every 15 minutes during the entire period of the performance stack tests;
				(b) Determine the average total secondary electric power for each individual test run in the three-run performance stack test by computing the average of all the 15-minute readings taken during each test run.
2. Mercury	Dry sorbent or activated carbon injection rate operating parameters	Establish a site-specific minimum sorbent or activated carbon injection rate operating limit according to §63.11211(b)	Data from the sorbent or activated carbon injection rate monitors and the mercury performance stack tests	(a) You must collect sorbent or activated carbon injection rate data every 15 minutes during the entire period of the performance stack tests;
				(b) Determine the average sorbent or activated carbon injection rate for each individual test run in the three-run performance stack test by computing the average of all the 15-minute readings taken

				during each test run.
				(c) When your unit operates at lower loads, multiply your sorbent or activated carbon injection rate by the load fraction (e.g., actual heat input divided by heat input during performance stack test, for 50 percent load, multiply the injection rate operating limit by 0.5) to determine the required injection rate.
3. CO	Oxygen	Establish a unit-specific limit for minimum oxygen level	Data from the oxygen analyzer system specified in §63.11224(a)	(a) You must collect oxygen data every 15 minutes during the entire period of the performance stack tests;
				(b) Determine the average hourly oxygen concentration for each individual test run in the three-run performance stack test by computing the average of all the 15-minute readings taken during each test run.
4. Any pollutant for which compliance is demonstrated by a performance stack test	Boiler operating load	Establish a unit-specific limit for maximum operating load according to §63.11212(c)	Data from the operating load monitors (fuel feed monitors or steam generation monitors)	(a) You must collect operating load data (fuel feed rate or steam generation data) every 15 minutes during the entire period of the performance test.
				(b) Determine the average operating load by computing the hourly averages using all of the 15-minute readings taken during each performance test.
				(c) Determine the average of the three test run averages during the performance test, and

				multiply this by 1.1 (110 percent) as your operating limit.
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[78 FR 7520, Feb. 1, 2013]

The requirements of Table 6 do not apply because there is no operating limit requirement on the boiler

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Table 7 to Subpart JJJJJJ of Part 63—Demonstrating Continuous Compliance

As stated in §63.11222, you must show continuous compliance with the emission limitations for affected sources according to the following:

If you must meet the following operating limits . . .	You must demonstrate continuous compliance by . . .
1. Opacity	a. Collecting the opacity monitoring system data according to §63.11224(e) and §63.11221; and
	b. Reducing the opacity monitoring data to 6-minute averages; and
	c. Maintaining opacity to less than or equal to 10 percent (daily block average).
2. Fabric Filter Bag Leak Detection Operation	Installing and operating a bag leak detection system according to §63.11224(f) and operating the fabric filter such that the requirements in §63.11222(a)(4) are met.
3. Wet Scrubber Pressure Drop and Liquid Flow Rate	a. Collecting the pressure drop and liquid flow rate monitoring system data according to §§63.11224 and 63.11221; and
	b. Reducing the data to 30-day rolling averages; and
	c. Maintaining the 30-day rolling average pressure drop and liquid flow rate at or above the minimum pressure drop and minimum liquid flow rate according to §63.11211.
4. Dry Scrubber Sorbent or Activated Carbon Injection Rate	a. Collecting the sorbent or activated carbon injection rate monitoring system data for the dry scrubber according to §§63.11224 and 63.11221; and
	b. Reducing the data to 30-day rolling averages; and
	c. Maintaining the 30-day rolling average sorbent or activated carbon injection rate at or above the minimum sorbent or activated carbon injection rate according to §63.11211.
5. Electrostatic Precipitator Total Secondary Electric	a. Collecting the total secondary electric power monitoring system data for the electrostatic precipitator according to §§63.11224 and 63.11221; and

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Power	
	b. Reducing the data to 30-day rolling averages; and
	c. Maintaining the 30-day rolling average total secondary electric power at or above the minimum total secondary electric power according to §63.11211.
6. Fuel Pollutant Content	a. Only burning the fuel types and fuel mixtures used to demonstrate compliance with the applicable emission limit according to §63.11213 as applicable; and
	b. Keeping monthly records of fuel use according to §§63.11222(a)(2) and 63.11225(b)(4).
7. Oxygen content	a. Continuously monitoring the oxygen content of flue gas according to §63.11224 (This requirement does not apply to units that install an oxygen trim system since these units will set the trim system to the level specified in §63.11224(a)(7)); and
	b. Reducing the data to 30-day rolling averages; and
	c. Maintaining the 30-day rolling average oxygen content at or above the minimum oxygen level established during the most recent CO performance test.
8. CO emissions	a. Continuously monitoring the CO concentration in the combustion exhaust according to §§63.11224 and 63.11221; and
	b. Correcting the data to 3 percent oxygen, and reducing the data to 1-hour averages; and
	c. Reducing the data from the hourly averages to 10-day rolling averages; and
	d. Maintaining the 10-day rolling average CO concentration at or below the applicable emission limit in Table 1 to this subpart.
9. Boiler operating load	a. Collecting operating load data (fuel feed rate or steam generation data) every 15 minutes; and
	b. Reducing the data to 30-day rolling averages; and
	c. Maintaining the 30-day rolling average at or below the operating limit established during the performance test according to §63.11212(c) and Table 6 to this subpart.

[78 FR 7521, Feb. 1, 2013]

The requirements of Table 7 do not apply, though the boiler has a wet scrubber, because no emission limitations apply



Table 8 to Subpart JJJJJ of Part 63—Applicability of General Provisions to Subpart JJJJJ

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As stated in §63.11235, you must comply with the applicable General Provisions according to the following:

General provisions cite	Subject	Does it apply?
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.11237.
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.5	Preconstruction Review and Notification Requirements	No
§63.6(a), (b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes.
§63.6(e)(1)(i)	General Duty to minimize emissions	No. See §63.11205 for general duty requirement.
§63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	No.
§63.6(e)(3)	SSM Plan	No.
§63.6(f)(1)	SSM exemption	No.
§63.6(h)(1)	SSM exemption	No.
§63.6(h)(2) to (9)	Determining compliance with opacity emission standards	Yes.
§63.7(a), (b), (c), (d), (e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§63.7(e)(1)	Performance testing	No. See §63.11210.
§63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e), (f), and (g)	Monitoring Requirements	Yes.
§63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No.
§63.8(c)(1)(iii)	Requirement to develop SSM Plan for CMS	No.
§63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to an

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		SSM plan. SSM plans are not required.
§63.9	Notification Requirements	Yes, excluding the information required in §63.9(h)(2)(i)(B), (D), (E) and (F). See §63.11225.
§63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	No.
§63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See §63.11225 for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunctions.
§63.10(b)(2)(iii)	Maintenance records	Yes.
§63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during SSM	No.
§63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(10)	Recording nature and cause of malfunctions	No. See §63.11225 for malfunction recordkeeping requirements.
§63.10(c)(11)	Recording corrective actions	No. See §63.11225 for malfunction recordkeeping requirements.
§63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§63.10(c)(15)	Allows use of SSM plan	No.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(d)(3)	Reporting opacity or visible emission	No.

	observation results	
§63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§63.10(d)(5)	SSM reports	No. <i>See</i> §63.11225 for malfunction reporting requirements.
§63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.11	Control Device Requirements	No.
§63.12	State Authority and Delegation	Yes.
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9)	Reserved	No.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7521, Feb. 1, 2013]

5.0 Emissions Information and Documentation

Emission Estimates

Table 5-1 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 C.

Table 0-1 Total Potential Emissions for Bennett Lumber

Non Fugitives

Source	PM (tons/yr)	PM 10 (tons/yr)	PM2.5 (tons/yr)	VOC's (tons/yr)	SO 2 (tons/yr)	CO (tons/yr)	NOx (tons/yr)	CO2 equiv (tons/yr)	EPA HAPs (tons/yr)	Acetald (tons/yr)	Formal dehyde (tons/yr)	Methan ol (tons/yr)	Propion aldehy (tons/yr)
Dry Kilns	3.94	3.94	3.94	110.31	NA	NA	NA		19.18	4.491	0.725	14.419	0.252
Process (excl kilns)	11.74	9.29	8.59	0.00	NA	NA	NA		4.07	3.800	0.267	0.000	0.000
Generator	0.00	0.00	0.00	0.01	0.00	0.02	0.73	71.43	0.10	0.002	0.005	0.000	
Boiler	99.48	99.48	99.48	12.13	7.98	249.00	70.22	67411.7	5.09	0.080	0.203	0.265	0.019
Subtotal	115.2	112.7	112.0	122.4	8.0	249.0	71.0	67483.2	24.4	8.373	1.200	9.9	0.272

Fugitives

Source	PM (tons/yr)	PM 10 (tons/yr)	PM2.5 (tons/yr)	VOC's (tons/yr)	SO 2 (tons/yr)	CO (tons/yr)	NOx (tons/yr)	CO2 equiv (tons/yr)	EPA HAPs (tons/yr)	Acetald (tons/yr)	Formald ehyde (tons/yr)	Methan ol (tons/yr)
Fugitive - Roads	1.00	3.60	0.54	NA	NA	NA	NA		NA	NA	NA	NA
Transfer - Conveyors	6.27	2.19	1.10	NA	NA	NA	NA		NA	NA	NA	NA
Transfer - Trucks	2.14	0.75	0.37	NA	NA	NA	NA		NA	NA	NA	NA
Storage - Piles	0.30	0.16	0.02	NA	NA	NA	NA		NA	NA	NA	NA
Storage - Bins	3.09	1.79	0.90	NA	NA	NA	NA		NA	NA	NA	NA
Solvents	NA	NA	NA	0.18	NA	NA	NA		0.08	NA	NA	NA
Subtotal	12.8	8.5	2.9	0.2	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0

Bennett Lumber Products, Inc. Title V permit renewal application 0814

6.0 Facility Classification

The Bennett Lumber Princeton facility is not a PSD major source. The potential to emit is less than 250 tpy for all criteria pollutants, as documented in Table 5-1. Our CO₂ emissions do not reach any regulatory thresholds for greenhouse gas programs, nor do we trigger any acid rain programs because of our emissions..

The Bennett Lumber Products facility is not a designated facility, as defined at IDAPA 58.01.01.006.27. The facility is a Title V major source, and synthetic minor source for PSD and HAPs, operating in an area that is attainment or unclassified for all pollutants.

8.0 Requested Permit Conditions

To demonstrate compliance with NAAQS and all applicable IDAPA regulations, Bennett proposes that existing cumulative annual throughput limits for the facility dry kilns, and all other annual emission limits and requirements, including the current CAM plan, be retained without change. At this time, we have not identified any conditions in our current Tier 1 air operating permit that seem obsolete.

Permit requirements for federal boiler MACT regulations should concisely reflect the applicability as documented in the attached Boiler MACT applicability analysis. Federal Subpart ZZZZ requirements are already in our current Title V permit, no need for any changes..

Appendix A

IDEQ Permit Application Forms

Form EI

All information required for form EI-CP, all pages, is included in Appendix C. This information is also included on the electronic data file BLP 063014 PTE.xls submitted on CD-ROM.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Cover Sheet for Air Permit Application – Tier I **Form CSTI**

Revision 5
 08/28/08

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

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name	Bennett lumber Products		
2. Facility Name	Bennett lumber products	3. Facility ID No.	057-00008
4. Brief Project Description - One sentence or less	Tier 1 AQ operating permit renewal		

PERMIT APPLICATION TYPE	
5. <input type="checkbox"/> Initial Tier I	<input type="checkbox"/> Tier I Administrative Amendment
<input type="checkbox"/> Tier I Minor Modification	<input type="checkbox"/> Tier I Significant Modification
<input checked="" type="checkbox"/> Tier I Renewal: Permit No.: T1-050201 Date Issued: 2/11/10, amended 1/17/11	

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

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



Please see instructions on back page before filling out the form. All information is required. If information is missing, the application will not be processed.

Identification

1. Facility name: 2. Existing facility identification number: Check if new facility (not yet operating)

3. Brief project description:

Facility Information

4. Primary facility permitting contact name: Contact type:

Telephone number: E-mail:

5. Alternate facility permitting contact name: Alternate contact type:

Telephone number: E-mail:

6. Mailing address where permit will be sent (street/city/county/state/zip code):

7. Physical address of permitted facility (if different than mailing address) (street/city/county/state/zip code):

8. Is the equipment portable? Yes* No *If yes, complete and attach PERF; see instructions.

9. NAICS codes: Primary NAICS Secondary NAICS

10. Brief business description and principal product produced:

11. Identify any adjacent or contiguous facility this company owns and/or operates:

12. Specify type of application Permit to construct (PTC); application fee of \$1,000 required. See instructions.

Tier I permit Tier II permit Tier II/Permit to construct

For Tier I permitted facilities only: If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit.

Co-process Tier I modification and PTC Incorporate PTC at the time of Tier I renewal Administratively amend the Tier I permit to incorporate the PTC upon applicant's request (IDAPA 58.01.01.209.05.a, b, or c)

Certification

In accordance with IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

13. Responsible official's name: Official's title:

Official's address:

Telephone number: E-mail:

Official's signature: Date:

14. Check here to indicate that you want to review the draft permit before final issuance.

TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

FACILITY INFORMATION

Facility/Permittee Name: Bennett Lumber Products, Inc.
Co-Permittee Name(s): _____
Facility Location: Princeton, Idaho
AIRS Facility No.: 057-00008
Facility Contact: Jeff Abbott Ph: 208 875-1121 Fax: 208 875-0191

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: T1-050201 Issuance Date: 1/17/2011
Tier I Operating Permit No.: _____ Issuance Date: _____

Compliance Reporting Period: From: January 1, 2014 To: Aug 2014 app. submittal

Is This Intended To Be A Semiannual Report Also? Yes No

Deviations Reported This Period? Yes No

List of Attachments: Annual Compliance Certification Table (Form AQ-C2) No. of Pages: 3
 Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: _____
 Other: _____ No. of Pages: _____
_____ No. of Pages: _____

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
Jeff Abbott
Print or Type Responsible Official Name

Plant Engineer

Responsible Official Title

8/7/14

Date

Co-Permittee Responsible Official Signature

Print or Type Co-Permittee Responsible Official Name

Co-Permittee Responsible Official Title

Date

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

Facility/Permittee Name: Bennett Lumber Products, Inc. Tier I Operating Permit: T1-050201
 Facility Location: Princeton, Idaho Issuance Date: 2/11/10, CAM update 1/17/11
 AIRS Facility No.: 057-00008 Compliance Reporting: January 1, 2014 - August 2014 app. submittal

1 Permit Condition	2 Description	3 Compliance Determination Method	4 Monitoring Frequency C, I, or N/A	5 Deviations and Excess Emissions Events	6 Permit Condition Compliance Status C / I	7 Attachment
2. Facility-Wide Conditions						
Fugitive Emissions						
2.1	Reasonable precautions to prevent fugitive emissions	Reasonable Control	I	Not Applicable	C	
2.2	Monitor & record fugitive emission control (if needed)	IDAPA 58.01.01.322.08	I	Not Applicable	C	Log on file onsite
2.3	Maintain record of fugitive emission complaints and corrective actions		I	Not Applicable	C	Log on file onsite
2.4	Conduct quarterly fugitive emission visual inspection - Address issues - record results	Method 22	I	No Excess Emissions except opacity excursions covered under 2.9	C	Log on file onsite
Odors						
2.5	Shall not cause odor air pollution	Reasonable Control	C	Not Applicable	C	
2.6	Maintain record of odor complaints and corrective actions	IDAPA 58.01.01.322.08	C	Not Applicable	C	Log on file onsite
Visible Emissions						
2.7	Opacity shall not exceed 20% for more than 3 minutes in a 60 minute period	IDAPA 58.01.01.625	I	Not Applicable	C	
2.8	Perform/record quarterly Visible Emission inspection & corrective actions (if any)	IDAPA 58.01.01.322.08, .07, .08	I	Not Applicable	C	Log on file onsite
Excess Emissions						
2.9	Excess Emission rates apply (IDAPA 58.01.01.130-136)	IDAPA 58.01.01.130-136	I	Isolated Opacity excursions, primarily during boiler restarts	I	Deviation / Excess Emissions reports filed with IDEQ LFO, copies retained in onsite files, AQ-C3 for all 2014 deviation through 8/5/2014 filed with IDEQ
Performance Testing						
2.10	IDEQ notification of required performance test, test consistent with IDAPA regulations	IDAPA 58.01.01.157	C	No deviations	C	Boiler source test protocol, notification, and testing met IDEQ and permit requirements
Monitoring and Recordkeeping						
2.11	Specific requirements for permit required recordkeeping	Not Applicable	I	Not Applicable	C	Records on file 5 years
Reports and Certifications						
2.12	All required reporting submitted with certification to appropriate regulatory agency	IDAPA 58.01.01.322	I	Not Applicable	C	Records on file 5 years
Fuel Burning Equipment						
2.13	gridtest emission thresholds for boiler	Source test regular opacity VE observations	I	No deviations	C	Boiler source test report and opacity compliance and recordkeeping
2.14	Document supplier fuel oil S content, as requested	Not Applicable	I	Not Applicable	C	Supplier guarantee
Open Burning						
2.15	Open Burning Rules apply (IDAPA 58.01.01.600-616)	Not Applicable	C	Not Applicable	C	No Open Burning
Federal 40CFR Provisions						
2.16	Regulated Substances for Accidental release	Not Applicable	I	Not Applicable	C	
2.17	Recycling and Emissions reduction	Not Applicable	I	Not Applicable	C	
2.18	NSPS/ESHAPs General Provisions	Not Applicable	I	Not Applicable	C	
2.19	NESHAP 40CFR61 Subpart A HAP provisions	Not Applicable	I	Not Applicable	C	
2.20	NESHAP 40CFR63 Subpart A HAP provisions	Not Applicable	I	Not Applicable	C	
2.21	Incorporation of Federal Requirements by Reference	Not Applicable	I	Not Applicable	C	
Facility-Wide Limit on HAPs						
2.22	Verify HAP emissions < 24.5 lbs total, 9.5 lbs any individual HAP	Not Applicable	I	Not Applicable	C	HAP Tracking spreadsheet, files onsite
3 Emissions Unit Group 1 - Zorr, Industries Hog Fuel Boiler						
2.7	Visible emission limit - 20% opacity (EPA Method 9)	IDAPA 58.01.01.625	I	Not Applicable	C	Quarterly VE observation forms, have trained VE observers onsite
2.8	Perform quarterly Method 9 VE on boiler stack; Records maintain in accordance w/ Section 2.11. Take corrective actions as necessary.	Method 9	I	No Excess Emissions	C	Log on file onsite
3.1	Particulate emission limit - 0.200 gridtest @ 8% Oxygen	IDAPA 58.01.01.677	I	Not Applicable	C	2010 source test shows particulates well within permit limits
3.2	PM-10 and CO hly and annual emission limits	IDAPA 58.01.01.677	I		C	2010 source test shows particulates and CO well within permit limits
3.3	Boiler fueled by wood only	P-2007.0107	C	None	C	
3.4	Maximum steam rate = 60000 lbs/hr unless limited by calculation based upon last source test steam rate and PM10 emissions	Recordkeeping for steam rate	C	Not Applicable	C	boiler logs and source test reports show compliance
3.5	Multi-cyclone and wet scrubber operate all times when boiler is operating, and be maintained consistent with the O&M manual. Multicyclone dP, ID fan outlet (scrubber inlet) pressure, and scrubber media flow rate shall be monitored continuously.	Multicyclone and Scrubber Records	C	No Deviations	C	Log book or recordkeeping files maintained onsite
3.6	Performance test conditions, with provisions for source test to test Cam parameter range	DEQ Approved Source test plan, report, and CAM plan	I	Not Applicable	C	DEQ Approved Source test plan, report, and CAM plan
3.7	Performance testing requirements and test frequency (IFT <75% old = no further testing req'd during permit term)	Performance Test	C	Not Applicable	C	Report filed with IDEQ within 30 days, copies retained in onsite file
3.8	Source test report required as specified under 2.16	Performance Test	I	Not Applicable	C	Report filed with IDEQ within 30 days, copies retained in onsite file
3.9	HAPs Monitoring	Monitor methanol and HAPs from boiler operations	C	Not Applicable	C	HAP Tracking spreadsheet updated monthly

1 Permit Condition	Description	2 Compliance Determination Method	3 Monitoring Frequency C, I, or N/A	4 Deviations and Excess Emissions Events	5 Permit Condition Compliance Status C / I	6 Attachment
3.10	Boiler Steam Production monitoring: continuous running 12 month total steam production, calculated PM10 and CO emissions	Boiler steam recordkeeping, emission calculations on HAP Tracking spreadsheet	C	Not Applicable	C	HAP Tracking spreadsheet updated monthly
3 Emissions Unit Group 2 - Drying Kilns						
2.7	Visible emission limit - 20% opacity	Not Applicable	I	Not Applicable	C	Quarterly VE observation forms, have trained VE observers onsite
2.8	If emissions are visible, Perform quarterly Method 9 VE on kilns to determine if any VE present; Record and maintain VE results; take corrective action if VE present in accordance w/ O&M manual within 24-hr	Method 22	I	No Excess Emissions	C	Log maintained onsite
4.1	Particulate and VOC emission limit - Process Weight for sources operating prior to 1001/1879	Calculations	Not Applicable	Not Applicable	C	
4.2	Annual throughput limit of 157MMBF for any consecutive 12 months	Inventory tracking	C	Not Applicable	C	Log maintained onsite.
4.3, 4.6	Temperature monitoring on each kiln, hourly recording	Kiln monitoring and recordkeeping. HAP emissions to date have conservatively assumed temp always > 200 degrees	Not Applicable	Not Applicable	C	Kiln data logs
4.4	Monitor & record for each kiln the monthly throughput by species and hrs of operation. The monthly throughput values shall be summed for each consecutive 12-month period to demonstrate compliance with annual throughput limit in 4.5.	Calculations	I	Not Applicable	C	Log maintained onsite
4.5	HAPs Monitoring	HAP Tracking spreadsheet	C	Not Applicable	C	HAP Tracking spreadsheet updated monthly
5 Emission Unit Group 3 - Woodworking Equipment (Cyclones, Baghouse Cyclones, Baghouses)						
2.7	Visible emission limit - 20% opacity	Not Applicable	I	Not Applicable	C	Quarterly VE observation forms, have trained VE observers onsite
2.8	Perform quarterly Method 9 VE on cyclones and baghouses to determine if any VE present; Record and maintain VE results in accordance w/ Section 1.6; take corrective action if VE present in accordance w/ O&M manual within 24-hr	Method 22	I	No Excess Emissions	C	Log maintained onsite
5.1	Particulate emission limit - PM-10 hourly and annually from each of the 6 sawdust cyclones	Calculations	I	Not Applicable	C	Compliance shown by onsite documentation showing
5.2	Particulate emission limit - Process Weight for sources operating prior to 1001/1879	Calculations	I	Not Applicable	C	same as above
5.3	Maintain cyclones and baghouse equipment in good working order & operate efficiently as practicable	Not Applicable	C	Not Applicable	C	same as above
5.4	Maintain and update Cyclone / baghouse Filter System Procedure Manual	Copy of Manual	I		C	DEQ Approved Procedure manual
5.5	Perform and keep records on monitoring required in Cyclone / baghouse system Procedure Manual	Regular monitoring and recordkeeping	I	Not Applicable	C	baghouse, cyclone recordkeeping, documented by onsite documentation
6 RICE Section						
6.1, 6.2	270hp compression ignition engine must comply with Subpart ZZZZ by May 3, 2013	documentation below under 6.4 - 6.9	C	no deviations	C	documentation below under 6.4 - 6.9
6.3	RICE emission limitations	documentation below under 6.4 - 6.9	C	no deviations	C	documentation below under 6.4 - 6.9
6.4	Operate to minimize emissions after May 3, 2013	documentation below under 6.4 - 6.9	C	no deviations	C	documentation below under 6.4 - 6.9
6.5	Operate consistent with manufacturer's guidance or maintenance plan	follow manufacturer's guidance	C	no deviations	C	manufacturer's guidance, maintenance logs
6.6	Meter must have hour meter	hour meter	C	no deviations	C	meter on engine
6.7	Minimize idling, <30 minutes, then emission limits apply	hour meter log	C	no deviations	C	hour meter log
6.8	Required oil change frequency	follow RICE regs, manufacturer's guidance	C	no deviations	C	maintenance logs
6.9	RICE hour limits for emergency and non-emergency use	hour meter	C	no deviations	C	hour meter log
6.10	recordkeeping requirements for maintenance, hours of operation	maintenance logs	C	no deviations	C	maintenance logs
7 CAM Section (ID fan pressure monitoring and wet scrubber media flow rate)						
7.1 - 7.3	Conduct required monitoring continuously, maintain monitoring equipment	Monitors and monitor recordkeeping	C	no deviations	C	Records in boiler operators room and/or office
7.4	If deviation, repair	monitor recordkeeping	C	no deviations	C	Records in boiler operators room and/or office
7.5	scrubber media flow calibrated consistent with manufacturer's recommendations, if any	manufacturer's documentation	C	no deviations	C	Records in boiler operators room and/or office
7.6	Deviations reported as PM10 excursion	monitor recordkeeping	C	no deviations	C	no deviations
7.7	Notify IDEQ if PM10 exceedance without CAM indicator exceedance, modify CAM plan		C	no deviations	C	
7.8	QIP possibly required by IDEQ if exceedances >5% of time		C	N/A	C	
7.9	reporting requirements include summary report of exceedances and monitor downtime	monitor recordkeeping	C	no deviations	C	Records in boiler operators room and/or office
7.10	Recordkeeping requirements for monitor values, downtime, maintenance, corrective actions, any QIP and implementation	monitor recordkeeping	C	no deviations	C	Records in boiler operators room and/or office
7.11	If CAM requirements conflict federal 40CFR64 regs, those federal regs shall govern		C	no deviations	C	
8 Insignificant Activities (10 storage areas, 12 transfer points, 8 point sources, 10 fuel storage or VOC usage areas, and an emergency generator)						

1 Permit Condition	Description	2 Compliance Determination Method	3 Monitoring Frequency C, I, or N/A	4 Deviations and Excess Emissions Events	5 Permit Condition Compliance Status C / I	6 Attachment
8.1	All equipment listed are regulated under the Facility Wide requirements/conditions	IDAPA 58.01.01.317.01 (b)(1) Citations 30 and 2	Not Applicable	Not Applicable	C	
9 Tier I OP General Provisions						
General Provisions						
8.1	Permittee shall comply with all conditions of this permit - noncompliance = violation		C	Not Applicable	C	
8.2	Necessity to reduce or halt activities to maintain compliance shall not be a defense		Not Applicable	Not Applicable	C	
8.3	Permittee shall submit corrected information promptly upon becoming aware of any incorrect information submitted for this permit		Not Applicable	Not Applicable	C	
Reopening						
8.4	Permit may be reopened, revised, revoked, reassued or terminated for cause		Not Applicable	Not Applicable	C	
8.5	Filing a request for permit changes does not stay any current permit condition		Not Applicable	Not Applicable	C	
Property Rights						
8.6	Permit does not convey any property rights or exclusive privileges		Not Applicable	Not Applicable	C	
Information Requests						
8.7	Permittee shall fulfill DEQ information requests		Not Applicable	Not Applicable	C	
8.8	Permittee shall provide DEQ records required to be maintained in permit, when requested		Not Applicable	Not Applicable	C	
Severability						
8.9	Permit provisions are severable (remainder of permit will not be affected)		Not Applicable	Not Applicable	C	
Changes requiring Permit Revision or Notice						
8.10	PTC required prior to commencement of any construction/modification of a source		Not Applicable	Not Applicable	C	
8.11	Changes requiring Tier I OP		Not Applicable	Not Applicable	C	
Federal and State Enforceability						
8.12	All terms/provisions of this permit are federally enforceable unless stated otherwise		Not Applicable	Not Applicable	C	
8.13	State-only provisions are enforceable under state law		C	Not Applicable	C	
Inspection and Entry						
8.14 and all subsections	DEQ or representative thereof shall be allowed to enter, inspect, & obtain records	Permittee and records shall be available for IDEQ inspection, as verified by historic inspections	Not Applicable	Not Applicable	C	
New Requirements During Permit						
8.15	Comply with applicable requirements that become effective during permit term		C	Not Applicable	C	
Fees						
8.16	Pay annual Tier I source fees to DEQ		I	I	C	Have paid all assessed fees, as small emitter helping subsidize the state's big emitters
Certification						
8.17	All documents submitted to DEQ shall comply w/IDAPA 58.01.01.123-123 certifications		I	I	C	All submits certified
Renewal						
8.18 and all subsections	Tier I OP permit application for renewal shall be submitted between 6 and 18 months prior to permit expiration date (11/15/2004-11/15/2005)	BLP met requirements for Tier I permit modification and renewal applications			C	The renewal application was provided within 30 days of the approval of the Tier II permit. This being, within 4 months of the Tier I permit expiration, was approved by IDEQ
Permit Shield						
8.19 and all subsections	Permit shield applies only to permit(s) & approved revisions after permit issuance		C	C	C	
Compliance Schedule and Progress reports						
8.20	Comply with the compliance schedule in the T1 OP (Section 5) and any applicable requirements that become effective during the term of this permit		C	Not Applicable	C	
Periodic Compliance Certification						
8.21 and all subsections	Submit compliance certifications annually	This revised document (and the original it supplements), and its predecessors provided within required timelines, provides the compliance certification required by state and federal regulations	Not Applicable	Not Applicable	C	Copies retained onsite
	Compliance certification shall address each term/condition contained in the T1 OP		Not Applicable	Not Applicable	C	
	Compliance certification shall be in an itemized form as detailed in this section of the OP		Not Applicable	Not Applicable	C	
	Original compliance certifications shall be submitted to DEQ w/ a copy sent to EPA		Not Applicable	Not Applicable	C	
False Statements						
8.22	No person shall knowingly make false statement, certification, representation, report, etc.		Not Applicable	Not Applicable	C	
No Tampering						
8.23	No person shall knowingly render inaccurate any monitoring device or method required		Not Applicable	Not Applicable	C	
Semi-Annual Monitoring Reports						
8.24	Submit semiannual report of any required monitoring & conditions by 7/30 and 1/30		I	Not Applicable	C	Reports filed with IDEQ, copies retained onsite
Reporting Deviations and Excess Emissions						
8.25	Excess emissions shall be reported in accordance w/IDAPA 58.01.01.130-138		I	See Section 1.9	C	Reports filed with IDEQ, copies retained onsite
	Permit deviations, their cause, and any corrective action shall be reported as in accordance w/ IDAPA 58.01.01.322.08.c. (semiannually)		I		C	
Permit Revisions Not Required						
8.26	Permit revisions not required as specified under IDAPA 58.01.01.322.05.b.		Not Applicable	Not Applicable	C	
Emergency						
8.27	Affirmative defense for noncompliance during an emergency as provided in IDAPA 58.01.01.332		Not Applicable	Not Applicable	C	

Process Stream Characteristics									
Brief Description of Process									
Flow Data	<p>Gas stream temperature: ambient degrees F</p> <p>Moisture content: 19% moisture content in post-kiln planer shavings grams of water/cubic feet (ft³) of dry air</p> <p><u>Pressure drop range</u> High: unknown in. H₂O Low: in. H₂O</p> <p>Dew point temperature of process stream: degrees F</p> <p>Inlet flow rate: 34605.45 ACFM</p>								
Dust Collection Device	<p><input checked="" type="checkbox"/> Pneumatic conveyor <input type="checkbox"/> Rotary airlock valves <input type="checkbox"/> Screw conveyors <input type="checkbox"/> Closed container</p> <p><input type="checkbox"/> Double dump <input type="checkbox"/> Drag conveyor</p> <p><input type="checkbox"/> Manual discharge device: <input type="checkbox"/> Slide gate OR <input type="checkbox"/> Hinged doors or drawers</p>								
Operating Schedule	<table> <tr> <td>Normal:</td> <td>2 hours/day</td> <td>1 days/week</td> <td>50 weeks/year</td> </tr> <tr> <td>Maximum:</td> <td>6 hours/day</td> <td>3 days/week</td> <td>50 weeks/year</td> </tr> </table>	Normal:	2 hours/day	1 days/week	50 weeks/year	Maximum:	6 hours/day	3 days/week	50 weeks/year
Normal:	2 hours/day	1 days/week	50 weeks/year						
Maximum:	6 hours/day	3 days/week	50 weeks/year						

Instructions for Form CYS

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

Please fill in 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

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

Brief Description of Process

Please 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline: 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 0
 04/02/07

Please see instructions on page 3 before filling out the form.

IDENTIFICATION				
Company Name:	Bennett Lumber Products, Inc	Facility Name:	BLP Princeton	
		Facility ID No.:	057-00008	
Brief Project Description: P12 form. Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for for last relevant PTC application				
CYCLONE SEPARATOR INFORMATION				
Equipment Description				
Manufacturer:	Aloha Metal Fabrication, 13.5' cyclone for new planer, in place for >10 years			
Model Number:	Aloha Metal Fabrication, 13.5' cyclone for new planer, in place for >10 years			
Dimensions	<p>Give dimensions of cyclone. (See sample diagram above.)</p> <p>1. B: in. 5. Z: in. 2. H: in. 6. D: in. 3. S: in. 7. A: in. 4. L: in. 8. J: in.</p>	Particulate Size Distribution Data		
		Micron range	Particle size distribution weight %	Manufacturer's guaranteed removal efficiency for each micron range
		0.5-1.0		
		1.0-5.0		
		5-10		larger material (planer shavings)
		10-20		
		Over 20		
		Type of Cyclone	<input type="checkbox"/> Wet <input checked="" type="checkbox"/> Dry	
		Type of Cyclone Unit	<input checked="" type="checkbox"/> Single <input type="checkbox"/> Quadruple <input type="checkbox"/> Dual <input type="checkbox"/> Multiclone	
		Blower	Blower horsepower: hp Design flow rate: flow rate measured summer 07 below scfm Draft: <input checked="" type="checkbox"/> Forced <input type="checkbox"/> Induced	
Design Criteria	Cyclone configuration: <input checked="" type="checkbox"/> Positive pressure <input type="checkbox"/> Negative pressure			
Pre-Treatment Device	<input type="checkbox"/> Cyclone <input type="checkbox"/> Knock-out chamber <input type="checkbox"/> Precooler <input checked="" type="checkbox"/> None <input type="checkbox"/> Preheater		Post-Treatment Device	
			<input type="checkbox"/> Baghouse/Cartridge <input type="checkbox"/> HEPA <input type="checkbox"/> Other:	

Process Stream Characteristics									
Brief Description of Process									
Flow Data	<p>Gas stream temperature: ambient degrees F</p> <p>Moisture content: Planer material is post kiln, moisture content approx 19% grams of water/cubic feet (ft³) of dry air</p> <p><u>Pressure drop range</u> High: in. H₂O Low: in. H₂O</p> <p>Dew point temperature of process stream: degrees F</p> <p>Inlet flow rate: 13030 ACFM</p>								
Dust Collection Device	<p><input checked="" type="checkbox"/> Pneumatic conveyor <input type="checkbox"/> Rotary airlock values <input type="checkbox"/> Screw conveyors <input type="checkbox"/> Closed container</p> <p><input type="checkbox"/> Double dump <input type="checkbox"/> Drag conveyor</p> <p><input type="checkbox"/> Manual discharge device: <input type="checkbox"/> Slide gate OR <input type="checkbox"/> Hinged doors or drawers</p>								
Operating Schedule	<table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">Normal:</td> <td style="width: 25%;">10 hours/day</td> <td style="width: 25%;">6 days/week</td> <td style="width: 35%;">50 weeks/year</td> </tr> <tr> <td>Maximum:</td> <td>13.5 hours/day</td> <td>7 days/week</td> <td>50 weeks/year</td> </tr> </table>	Normal:	10 hours/day	6 days/week	50 weeks/year	Maximum:	13.5 hours/day	7 days/week	50 weeks/year
Normal:	10 hours/day	6 days/week	50 weeks/year						
Maximum:	13.5 hours/day	7 days/week	50 weeks/year						

Instructions for Form CYS

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

Please fill in 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

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

Brief Description of Process

Please 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline: 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision C
 04/02/07

Please see instructions on page 3 before filling out the form.

IDENTIFICATION							
Company Name:	Bennett Lumber Products, Inc	Facility Name:	BLP Princeton				
		Facility ID No.:	057-00008				
Brief Project Description: P-6 form, with baghouse P-24 control. Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for for last relevant PTC application							
CYCLONE SEPARATOR INFORMATION							
Equipment Description							
Manufacturer:	Western Pneumatics		Model Number: 3' High Efficiency				
Dimensions	<p>Give dimensions of cyclone. (See sample diagram above.)</p> <p>1. B: in. 5. Z: in. 2. H: in. 6. D: in. 3. S: in. 7. A: in. 4. L: in. 8. J: in.</p>			Particulate Size Distribution Data			
				Micron range	Particle size distribution weight %	Manufacturer's guaranteed removal efficiency for each micron range	
				0.5-1.0			
				1.0-5.0			
				5-10		smaller material (sawdust from sawmill)	
	10-20		used IDEQs for wood products ind EF as documnted in EI				
	Over 20						
	Type of Cyclone	<input type="checkbox"/> Wet <input checked="" type="checkbox"/> Dry					
Type of Cyclone Unit	<input checked="" type="checkbox"/> Single <input type="checkbox"/> Quadruple <input type="checkbox"/> Dual <input type="checkbox"/> Multiclone						
Blower	Blower horsepower: hp Design flow rate: scfm Draft: <input checked="" type="checkbox"/> Forced <input type="checkbox"/> Induced						
Design Criteria	Cyclone configuration: <input checked="" type="checkbox"/> Positive pressure <input type="checkbox"/> Negative pressure						
Pre-Treatment Device	<input type="checkbox"/> Cyclone <input type="checkbox"/> Knock-out chamber <input type="checkbox"/> Precooler <input checked="" type="checkbox"/> None <input type="checkbox"/> Preheater		Post-Treatment Device				
			<input checked="" type="checkbox"/> Baghouse/Cartridge <input type="checkbox"/> HEPA <input type="checkbox"/> Other:				

Process Stream Characteristics									
Brief Description of Process									
Flow Data	<p>Gas stream temperature: ambient degrees F</p> <p>Moisture content: wood products have 47% moisture content grams of water/cubic feet (ft³) of dry air</p> <p><u>Pressure drop range</u> High: unknown in. H₂O Low: in. H₂O</p> <p>Dew point temperature of process stream: degrees F</p> <p>Inlet flow rate: 2005 ACFM</p>								
Dust Collection Device	<p><input checked="" type="checkbox"/> Pneumatic conveyor <input type="checkbox"/> Rotary airlock valves <input type="checkbox"/> Screw conveyors <input type="checkbox"/> Closed container</p> <p><input type="checkbox"/> Double dump <input type="checkbox"/> Drag conveyor</p> <p><input type="checkbox"/> Manual discharge device: <input type="checkbox"/> Slide gate OR <input type="checkbox"/> Hinged doors or drawers</p>								
Operating Schedule	<table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">Normal:</td> <td style="width: 25%;">12 hours/day</td> <td style="width: 25%;">5 days/week</td> <td style="width: 35%;">50 weeks/year</td> </tr> <tr> <td>Maximum:</td> <td>16 hours/day</td> <td>7 days/week</td> <td>52 weeks/year</td> </tr> </table>	Normal:	12 hours/day	5 days/week	50 weeks/year	Maximum:	16 hours/day	7 days/week	52 weeks/year
Normal:	12 hours/day	5 days/week	50 weeks/year						
Maximum:	16 hours/day	7 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.

Please fill in 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

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

Brief Description of Process

Please 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline: 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 0
 04/02/07

Please see instructions on page 3 before filling out the form.

IDENTIFICATION			
Company Name:	Bennett Lumber Products, Inc	Facility Name:	BLP Princeton
		Facility ID No.:	057-00008
Brief Project Description: P-13 form. Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for for last relevant PTC application			
CYCLONE SEPARATOR INFORMATION			
Equipment Description			
Manufacturer:	Unknown manufacturer, 7' cyclone atop shavings truck bin, installed by 1970s		
Dimensions	<p>Give dimensions of cyclone. (See sample diagram above.)</p> <p>1. B: in. 5. Z: in. 2. H: in. 6. D: in. 3. S: in. 7. A: in. 4. L: in. 8. J: in.</p>		
	Model Number: Unknown manufacturer, 7' cyclone atop shavings truck bin, installed by 1970s		
	Particulate Size Distribution Data		
	Micron range	Particle size distribution weight %	Manufacturer's guaranteed removal efficiency for each micron range
	0.5-1.0		
	1.0-5.0		
	5-10		Larger (planer shavings)
	10-20		
	Over 20		
	Type of Cyclone <input type="checkbox"/> Wet <input checked="" type="checkbox"/> Dry		
	Type of Cyclone Unit <input checked="" type="checkbox"/> Single <input type="checkbox"/> Quadruple <input type="checkbox"/> Dual <input type="checkbox"/> Multiclone		
	Blower Blower horsepower: hp Design flow rate: flow rate measured summer 07 below scfm Draft: <input type="checkbox"/> Forced <input type="checkbox"/> Induced		
Design Criteria	Cyclone configuration: <input checked="" type="checkbox"/> Positive pressure <input type="checkbox"/> Negative pressure		
Pre-Treatment Device	<input type="checkbox"/> Cyclone <input type="checkbox"/> Knock-out chamber <input type="checkbox"/> Precooler <input checked="" type="checkbox"/> None <input type="checkbox"/> Preheater		Post-Treatment Device <input type="checkbox"/> Baghouse/Cartridge <input type="checkbox"/> HEPA <input type="checkbox"/> Other:

Process Stream Characteristics									
Brief Description of Process									
Flow Data	<p>Gas stream temperature: ambient degrees F</p> <p>Moisture content: planer shavings material has approx 19% moisture content grams of water/cubic feet (ft³) of dry air</p> <p><u>Pressure drop range</u> High: in. H₂O Low: in. H₂O</p> <p>Dew point temperature of process stream: degrees F</p> <p>Inlet flow rate: 43000 ACFM</p>								
Dust Collection Device	<p><input checked="" type="checkbox"/> Pneumatic conveyor <input type="checkbox"/> Rotary airlock valves <input type="checkbox"/> Screw conveyors <input type="checkbox"/> Closed container</p> <p><input type="checkbox"/> Double dump <input type="checkbox"/> Drag conveyor</p> <p><input type="checkbox"/> Manual discharge device: <input type="checkbox"/> Slide gate OR <input type="checkbox"/> Hinged doors or drawers</p>								
Operating Schedule	<table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">Normal:</td> <td style="width: 25%;">10 hours/day</td> <td style="width: 25%;">6 days/week</td> <td style="width: 35%;">50 weeks/year</td> </tr> <tr> <td>Maximum:</td> <td>14 hours/day</td> <td>7 days/week</td> <td>50 weeks/year</td> </tr> </table>	Normal:	10 hours/day	6 days/week	50 weeks/year	Maximum:	14 hours/day	7 days/week	50 weeks/year
Normal:	10 hours/day	6 days/week	50 weeks/year						
Maximum:	14 hours/day	7 days/week	50 weeks/year						

Instructions for Form CYS

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

Please fill in 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

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

Brief Description of Process

Please 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
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Air Permit Hotline: 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 0
 04/02/07

Please see instructions on page 3 before filling out the form.

IDENTIFICATION				
Company Name:	Bennett Lumber Products, Inc	Facility Name:	BLP Princeton	
		Facility ID No.:	057-00008	
Brief Project Description: P14 form: Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by IDEQ for for last relevant PTC application				
CYCLONE SEPARATOR INFORMATION				
Equipment Description				
Manufacturer:	Manufacturer Aloha Metal Fabrication, 8' cyclone, in place since 1970s			
Model Number:	Manufacturer Aloha Metal Fabrication, 8' cyclone, in place since 1970s			
Dimensions	<p>Give dimensions of cyclone. (See sample diagram above.)</p> <p>1. B: in. 5. Z: in. 2. H: in. 6. D: in. 3. S: in. 7. A: in. 4. L: in. 8. J: in.</p>	Particulate Size Distribution Data		
		Micron range	Particle size distribution weight %	Manufacturer's guaranteed removal efficiency for each micron range
		0.5-1.0		
		1.0-5.0		
		5-10		planer shavings (larger particles)
		10-20		
		Over 20		
Type of Cyclone	<input type="checkbox"/> Wet <input checked="" type="checkbox"/> Dry			
Type of Cyclone Unit	<input checked="" type="checkbox"/> Single <input type="checkbox"/> Quadruple <input type="checkbox"/> Dual <input type="checkbox"/> Multiclone			
Blower	Blower horsepower: hp Design flow rate: measured flow rate below scfm Draft: <input checked="" type="checkbox"/> Forced <input type="checkbox"/> Induced			
Design Criteria	Cyclone configuration: <input checked="" type="checkbox"/> Positive pressure <input type="checkbox"/> Negative pressure			
Pre-Treatment Device	<input type="checkbox"/> Cyclone <input type="checkbox"/> Knock-out chamber <input type="checkbox"/> Precooler <input checked="" type="checkbox"/> None <input type="checkbox"/> Preheater		Post-Treatment Device	
			<input type="checkbox"/> Baghouse/Cartridge <input type="checkbox"/> HEPA <input type="checkbox"/> Other:	

Process Stream Characteristics									
Brief Description of Process									
Flow Data	<p>Gas stream temperature: ambient degrees F</p> <p>Moisture content: shavings material is posy dry kiln, moisture content approx 19% grams of water/cubic feet (ft³) of dry air</p> <p><u>Pressure drop range</u> High: in. H₂O Low: in. H₂O</p> <p>Dew point temperature of process stream: degrees F</p> <p>Inlet flow rate: 43000 ACFM</p>								
Dust Collection Device	<p><input checked="" type="checkbox"/> Pneumatic conveyor <input type="checkbox"/> Rotary airlock valves <input type="checkbox"/> Screw conveyors <input type="checkbox"/> Closed container</p> <p><input type="checkbox"/> Double dump <input type="checkbox"/> Drag conveyor</p> <p><input type="checkbox"/> Manual discharge device: <input type="checkbox"/> Slide gate OR <input type="checkbox"/> Hinged doors or drawers</p>								
Operating Schedule	<table style="width: 100%; border: none;"> <tr> <td style="width: 15%;">Normal:</td> <td style="width: 25%;">10 hours/day</td> <td style="width: 25%;">6 days/week</td> <td style="width: 35%;">50 weeks/year</td> </tr> <tr> <td>Maximum:</td> <td>14 hours/day</td> <td>7 days/week</td> <td>52 weeks/year</td> </tr> </table>	Normal:	10 hours/day	6 days/week	50 weeks/year	Maximum:	14 hours/day	7 days/week	52 weeks/year
Normal:	10 hours/day	6 days/week	50 weeks/year						
Maximum:	14 hours/day	7 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.

Please fill in 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

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

Brief Description of Process

Please 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
 Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton		Facility ID No: 057-00008		
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:	FACILITY-WIDE FUGITIVES					
2. EU ID Number:	P1-4, P8-10, P21-23, ALL ST AND TR ST AND TR EMISS					
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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 157585MMBF/YR CUMULATIVELY, MATERIAL BALANCE					
REQUESTED LIMITS						
20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):						
<input checked="" type="checkbox"/> Production Limit(s):	157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS					
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports					
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
 Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton		Facility ID No: 057-00008		
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 1					
2. EU ID Number:	P15					
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:P-050206 Date Issued: 10/6/05					
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?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):	NONE					
<input checked="" type="checkbox"/> Production Limit(s):	157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS					
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports					
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton		Facility ID No: 057-00008		
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 2					
2. EU ID Number:	P16					
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:P-050206 Date Issued: 10/6/05					
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?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):	NONE					
<input checked="" type="checkbox"/> Production Limit(s):	157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS					
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports					
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
 Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton		Facility ID No: 057-00008		
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 3				
2. EU ID Number:		P17				
3. EU Type:		<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source – Previous Permit #:P-050206 Date Issued: 10/6/05				
4. Manufacturer:		MOORE				
5. Model:		73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS				
6. Maximum Capacity:		APPROX 100MBF/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?		<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NOx	VOC	CO
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?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):		NONE				
<input checked="" type="checkbox"/> Production Limit(s):		157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS				
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton		Facility ID No: 057-00008		
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 4					
2. EU ID Number:	P18					
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> 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?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):	NONE					
<input checked="" type="checkbox"/> Production Limit(s):	157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS					
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports					
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton			Facility ID No: 057-00008	
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:		<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> 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?		<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):		NONE				
<input checked="" type="checkbox"/> Production Limit(s):		157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS				
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton			Facility ID No: 057-00008	
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 6					
2. EU ID Number:	P20					
3. EU Type:	<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> 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:	1989					
8. Date of Modification (if any)	NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED					
9. Is this a Controlled Emission Unit?	<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No					
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)					
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)					
<input type="checkbox"/> Operation Hour Limit(s):	NONE					
<input checked="" type="checkbox"/> Production Limit(s):	157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS					
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports					
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/27/07

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

IDENTIFICATION						
Company Name: Bennett Lumber Products, Inc		Facility Name: BLP Princeton			Facility ID No: 057-00008	
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 7				
2. EU ID Number:		P25				
3. EU Type:		<input type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input checked="" type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:P-050206 Date Issued: 10/6/05				
4. Manufacturer:		MOORE				
5. Model:		73' DOUBLE TRACK VENTED VIA HUMIDITY CONTROL LIDS				
6. Maximum Capacity:		APPROX 200MBF/CHARGE				
7. Date of Construction:		2005				
8. Date of Modification (if any)		NONE ON EQUIPMENT, THROUGHPUT LIMITS HAVE EVOLVED				
9. Is this a Controlled Emission Unit?		<input checked="" type="checkbox"/> No <input type="checkbox"/> 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?		<input type="checkbox"/> Yes <input type="checkbox"/> No				
16. Does the manufacturer guarantee the control efficiency of the control equipment?		<input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, attach and label manufacturer guarantee)				
Control Efficiency	Pollutant Controlled					
	PM	PM10	SO ₂	NO _x	VOC	CO
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?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If Yes, check all that apply below)				
<input type="checkbox"/> Operation Hour Limit(s):		NONE				
<input checked="" type="checkbox"/> Production Limit(s):		157585 MMBF/YR CUMULATIVELY THROUGH THE KILNS				
<input type="checkbox"/> Material Usage Limit(s):						
<input type="checkbox"/> Limits Based on Stack Testing		Please attach all relevant stack testing summary reports				
<input type="checkbox"/> 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.



DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline - 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
03/27/07

Please see instructions on page 3 before filling out the form.

IDENTIFICATION				
Company Name: Bennett Lumber Products, Inc.		Facility Name: BLP Princeton		Facility ID No: 057-00008
Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and				
EXEMPTION				
Please see IDAPA 58.01.01.222 for a list of industrial boilers that are exempt from Permit to Construct requirements.				
BOILER (EMISSION UNIT) DESCRIPTION AND SPECIFICATIONS				
1. Type of Request: <input type="checkbox"/> New Unit <input type="checkbox"/> Unpermitted Existing Unit <input checked="" type="checkbox"/> Modification to a Unit with Permit #: [Tier II/PTC No. T2-010208				
2. Use of Boiler: <input checked="" type="checkbox"/> % Used For Process <input type="checkbox"/> % Used For Space Heat <input type="checkbox"/> % Used For Generating Electricity <input type="checkbox"/> Other:				
3. Boiler ID Number: b1		4. Rated Capacity: <input type="checkbox"/> Million British Thermal Units Per Hour (MMBtu/hr) <input checked="" type="checkbox"/> app. 56000 1,000 Pounds Steam Per Hour (1,000 lb steam/hr)		
5. Construction Date: before 10/1/79		6. Manufacturer: Zurn		7. Model: Hog Fuel boiler
8. Date of Modification (if applicable):		9. Serial Number (if available):		10. Control Device (if any): multi-clone, scrubber Note: Attach applicable control equipment
FUEL DESCRIPTION AND SPECIFICATIONS				
11. Fuel Type	<input type="checkbox"/> Diesel Fuel (#) (gal/hr)	<input type="checkbox"/> Natural Gas (cf/hr)	<input type="checkbox"/> Coal (unit: /hr)	<input checked="" type="checkbox"/> Other Fuels (unit: /hr)
12. Full Load Consumption Rate				4.99 BDT/hr
13. Actual Consumption Rate				up to 36302 BDT/yr
14. Fuel Heat Content (Btu/unit, LHV)				17.59 MMBtu/BDT
15. Sulfur Content wt%				0.025 lbs SOx/MMBtu
16. Ash Content wt%		N/A		approx 1%
STEAM DESCRIPTION AND SPECIFICATIONS				
17. Steam Heat Content	NA	NA		1050 BTU/lb steam
18. Steam Temperature (°F)	N/A	N/A		250
19. Steam Pressure (psi)	N/A	N/A		
20. Steam Type	N/A	N/A	<input type="checkbox"/> Saturated <input type="checkbox"/> Superheated	<input checked="" type="checkbox"/> Saturated <input type="checkbox"/> Superheated
OPERATING LIMITS & SCHEDULE				
21. Imposed Operating Limits (hours/year, or gallons fuel/year, etc.): 8760 hrs/yr, 407.34 MM lbs steam/yr				

22. Operating Schedule (hours/day, months/year, etc.): 8760 hrs/yr

Instructions for Form EU5

Please refer to IDAPA 58.01.01.222 for a list of industrial boilers which are exempt from the Permit to Construct requirements.

Please fill in the same company name, facility name (if different), and facility ID number as on Form CS. This is useful in case any pages of the application are separated.

Boiler Description and Specification:

1. Indicate whether the unit is new, existing but unpermitted, or being modified.
2. Indicate the percentage of the steam used for process, space heat, generating electricity, or others.
3. Provide the boiler identification (ID) number. Each boiler in the application must have its own number. If boilers included in this permit application are not identical in make and model, fill out a separate EU5 form for each boiler. If the boilers are identical, attach a separate sheet labeled EU5A listing them by ID number and date of construction or modification. The boiler ID numbers should match the boiler ID numbers used on other construction permit applications and within this application. It can be any number. However, if you submitted an operating permit application, the numbers used for identification purposes in this application should be consistent with the ID numbers used in your operating permit application.
4. The boiler's rated capacity should be read from the boiler's nameplate or from the manufacturer's literature.
5. The date of construction of the emission unit is the date, month, and year in which construction or modification begins as defined in EU0 Form Instruction item 7.
6. Provide the name of the manufacturer of the boiler.
7. Provide the model number of the boiler. This number should be available from the nameplate of the boiler.
8. If the boiler has been or will be modified, give the date, month and year of the most recent or future modification.
9. Provide the manufacturer's serial number for this boiler, if available.
10. Provide the control device name and number if a pollution control device is attached to this emission unit. The name and number of the control device should be consistent with control equipment forms throughout the application. **Note: a separate control equipment form(s) should be attached for all applicable control equipment serving this unit.**

Fuel Description and Specifications:

11. Indicate the fuel type used by the boiler. If diesel fuel is used, you need to indicate the ranking number. If the boiler is a dual-fuel engine, please check all appropriate fuel type boxes in this row.
12. The full-load consumption rate is the fuel consumption rate at the boiler's rated capacity.
13. The actual consumption rate is the fuel consumption rate (usually daily average) under typical operational conditions.
14. Provide fuel net or lower heating value (LHV).
15. Provide the weight percentage of the sulfur content in the fuel.
16. Provide the weight percentage of the ash content in the fuel. For gaseous fuel, this information is not required.

Emissions Units - Industrial Boiler Information **Form EU5**

17. Provide the steam heat content. This information is not required for gaseous or liquid fuel.
18. Provide the steam temperature in °F. This information is not required for gaseous or liquid fuel.
19. Provide the steam pressure in pound per square inch (psi). This information is not required for gaseous or liquid fuel.
20. Provide the steam type (i.e. saturated or superheated). This information is not required for gaseous or liquid fuel.

Operation Limits:

21. If any, indicate the operating limits you imposed on this boiler in the units of operating hours per year, or gallons fuel per hour, per year, etc.
22. Indicate your operation schedule for the projected maximum operation of the engine.

Instructions for Form BCE

This form is used by IDEQ to identify the baghouse control equipment in this permit application.

Please fill in 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.

Provide the following:

1. The name of the emissions unit (EU), exactly the same as it appears on Form EU0.
2. The emissions unit ID No., exactly the same as it appears on Form EU0.
3. Control equipment ID No., exactly the same as it appears on Form EU0.
4. Stack ID No.
5. Name of the baghouse manufacturer.
6. Model number of the baghouse.
7. Type of baghouse (pulse jet, reverse air, etc.).
8. Type of bags (polyester, fiberglass, etc.).
9. Size and dimensions of the bags in feet.
10. Number of bags.
11. Air to cloth ratio.



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

IDENTIFICATION	
1. Company Name Bennett Lumber Products, Inc.	2. Facility Name: Bennett Lumber Products
3. Brief Project Description:	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:	<input type="checkbox"/> New unit <input type="checkbox"/> Unpermitted existing unit <input type="checkbox"/> Modification to an existing permitted unit? Permit number: _____ <input type="checkbox"/> Full-time operation (non-emergency standby use)? <input type="checkbox"/> Emergency standby use only (operation limited to 100 hrs/yr for maintenance and testing and emergency use only)? <input type="checkbox"/> Emergency fire pump use only? <input checked="" type="checkbox"/> Stationary test cell/stand operation only (as defined in NSPS Subpart ZZZZ)? <input type="checkbox"/> National security operation only (as defined in NSPS Subpart ZZZZ)? <input type="checkbox"/> Institutional emergency standby IC engine (as defined in NSPS Subpart ZZZZ)?

IC ENGINE SPECIFICATIONS	
Questions 5 through 15 apply to all IC engines.	
5. IC Engine Manufacturer: <u>John Deere</u>	6. Model: <u>6081AF001</u> 7. Date manufactured: _____ 8. Model year: <u>before 2005</u>
9. Date of installation (if an existing IC engine): <u>> 10 yrs ago</u> 10. IC Engine cylinder displacement: _____ liters per cylinder	
11. Maximum rated horsepower (per the data plate/manufacture specifications): <u>270</u> bhp	
12. EPA Certification: Tier certification number _____ or <input checked="" type="checkbox"/> None/not tier certified	
13. Ignition type: <input type="checkbox"/> Spark <input checked="" type="checkbox"/> Compression	
14. Fuel combusted in the IC engine? <input checked="" type="checkbox"/> Distillate fuel oil <input type="checkbox"/> Natural gas/LNG <input type="checkbox"/> LPG/propane If distillate fuel oil (#1, #2, or a mixture) is used, what is the maximum sulfur content? <input type="checkbox"/> 15 ppm (0.0015% by weight) <input type="checkbox"/> 500 ppm (0.05% by weight)	
15. IC engine exhaust stack parameters: Diameter _____ inches Height _____ feet Temperature _____ °F Flow rate _____ acfm	

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 <u>2</u> hrs/mon _____ hrs/qtr _____ hrs/yr	
17. Maximum daily operation: <u><1</u> hrs/day 18. Maximum annual operation: <u>500</u> 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)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 20. What will the CO emissions limit be? _____ ppmvd	
21. Will CO emissions be reduced by 70% or more? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
22. Will a CEMS (Continuous Emissions Monitoring System) be used to measure pollutants in the IC engine exhaust stream? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
23. Will a CPMS (Continuous Parameters Monitoring System) be used to measure parameters of the IC engine exhaust stream? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
24. Will the IC engine be equipped with an oxidation catalyst? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
25. If applicable, will the oxidation catalyst be equipped with a temperature measurement system to ensure it is operating properly? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
26. Will the IC engine be equipped with a diesel particulate filter? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Instructions for Form EU1

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.

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 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.

Instructions for Form SCE

This information is used by DEQ to identify the scrubber control equipment in this permit application.

Please fill in 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.

Provide the following:

1. The name of the emissions unit, exactly the same as it appears on Form EU0.
2. The emissions unit ID No., exactly the same as it appears on Form EU0.
3. Control equipment ID No., exactly the same as it appears on Form EU0.
4. Stack ID No.
5. Name of the scrubber manufacturer.
6. Model number of the scrubber.
7. Type of scrubber (e.g., spray chamber, venturi, packed bed, etc.).
8. Dimensions in feet (height x diameter x length)
9. Scrubber water flow to scrubber (gallons per minute).
10. Pressure drop across scrubber.



DEQ AIR QUALITY PROGRAM
 1410 N. Hilton, Boise, ID 83706
 For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

PERMIT TO CONSTRUCT APPLICATION

Revision 3
 03/26/07

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

IDENTIFICATION		
Company Name: Bennett Lumber Products, Inc.	Facility Name: BLP Princeton	Facility ID No: 057-00008
Brief Project Description: Tier 1 AQ Operating Permit renewal: same data as previously submitted and approved by		
APPLICABILITY DETERMINATION		
1. Will this project be subject to 1990 CAA Section 112(g)? (Case-by-Case MACT)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*
	* If YES, applicant must submit an application for a case-by-case MACT determination [IAC 567 22-1(3)"b" (8)]	
2. Will this project be subject to a New Source Performance Standard? (40 CFR part 60)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*
	*If YES, please identify sub-part: <u>grandfathered bef dB, dC</u>	
3. Will this project be subject to a MACT (Maximum Achievable Control Technology) regulation? (40 CFR part 63)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*
	*If YES, please identify sub-part: _____	
THIS ONLY APPLIES IF THE PROJECT EMITS A HAZARDOUS AIR POLLUTANT		
4. Will this project be subject to a NESHAP (National Emission Standards for Hazardous Air Pollutants) regulation? (40 CFR part 61)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*
	*If YES, please identify sub-part: _____	
5. Will this project be subject to PSD (Prevention of Significant Deterioration)? (40 CFR section 52.21)	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES
6. Was netting done for this project to avoid PSD?	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> YES*
	*If YES, please attach netting calculations	
IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT		

Instructions for Form FRA

This form is designed to provide the review engineer information regarding applicable federal regulations. This project may be subject to a federal regulation.

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

1. The 112(g) provision is a transitional measure to ensure that facilities protect the public from hazardous air pollutants until EPA issues MACT standards that apply to the facilities. If this project is already subject to a MACT regulation, it will not be subject to the provisions of 112(g).
2. New Source Performance Standards are federal regulations that apply to a wide range of sources of criteria air pollutants. To locate the rule, go to:
http://www.access.gpo.gov/nara/cfr/waisidx_01/40cfr60_01.html
3. MACT regulations apply to sources of hazardous air pollutants. To locate the rule, go to:
www.epa.gov/ttn/atw/mactfnl.html.
4. NESHAP regulations apply to sources of the following pollutants: beryllium, mercury, vinyl chloride, radionuclides, benzene, asbestos, and arsenic. To locate the rule, go to:
www.access.gpo.gov/nara/cfr/waisidx_02/40cfr61_02.html
5. If facility is a PSD major source and the net emissions increase from this project exceeds significant levels (as defined by 40 CFR 52.21), this project will be subject to prevention of significant deterioration (PSD) regulations. Please contact DEQ prior to application submission.
6. Indicate whether emissions netting was used in the PSD applicability determination.

Instructions for Form BCE

This form is used by IDEQ to identify the baghouse control equipment in this permit application.

Please fill in 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.

Provide the following:

1. The name of the emissions unit (EU), exactly the same as it appears on Form EU0.
2. The emissions unit ID No., exactly the same as it appears on Form EU0.
3. Control equipment ID No., exactly the same as it appears on Form EU0.
4. Stack ID No.
5. Name of the baghouse manufacturer.
6. Model number of the baghouse.
7. Type of baghouse (pulse jet, reverse air, etc.).
8. Type of bags (polyester, fiberglass, etc.).
9. Size and dimensions of the bags in feet.
10. Number of bags.
11. Air to cloth ratio.

Appendix B

Equipment List

Exactly as in Table 1-1 of our current Title V permit. No changes are proposed with this renewal.

Permit Section	Source Description	Emissions Control(s)
2	Truck bark bin	None
2	Truck sawdust bin	None
2	Truck chip bin	None
2	Boiler fuel storage	None
2	Auxiliary fuel bin	None
2	Shavings truck bin	None
2	Log yard waste No.1	None
2	Rock storage	None
2	Log yard waste No. 2	None
2	Ash storage	None
2	Hog in-feed conveyor	None
2	Bark conveyor system	None
2	Hog out-feed conveyor	None
2	Bark screen oversize	None
2	Deck trash conveyor	None
2	Truck bark bin conveyor	None
2	Boiler bark conveyor	None
2	Sawdust conveyor- vibrator	None
2	Chip oversize conveyor	None
2	Main fuel conveyor	None
2	Auxiliary fuel-bin conveyor	None
2	Flyash transport	None
2	Sawmill	None
2	Small log debarker	None
2	Large log debarker	None
2	Bark hog	None
2	Bark screen	None
2	Baghouse cyclone	None
2	Chip screen	None
2	Planing mill-new	None

Permit Section	Source Description	Emissions Control(s)
2	Planing mill-old	None
2	20,000-gallon diesel fuel tank	None
2	20,000-gallon diesel fuel tank	None
2	20,000-gallon gasoline tank	None
2	2,500-gallon diesel fuel tank	None
2	1,000-gallon stove oil tank	None
2	30-gallon parts washer	None
2	30-gallon parts washer	None
2	30-gallon oarts washer	None
2	2,000-gallon aviation gas storage	None
2	1,000-gallon used oil tank	None
2	2,000-cubic yard rock storage	None
2	Bark bin to truck	None
2	Sawdust bin to truck	None
2	Chip bin to truck	None
2	Shavings bin to truck	None
3	Zurn Industries hog-fuel boiler: Type C, rated at 60,000 pound per hour saturated steam; installed 1978	Zurn Industries multiclone followed by Zurn wet scrubber, 11,400 actual cubic feet per minute-(acfm).
4	Dry kilns No. 1 and No. 2: Manufacturer: Moore Length: 73 feet Design: Double track Installed June 1972 and June 1964 Dry Kiln No.3: Manufacturer: Lumber systems Inc Length: 73 feet Design: Single track Installed: March 1984 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 Dry Kiln No. 7 Manufacturer: Wellons Length: 73 feet Design: Double-track Pennitted for installation: October 6, 2005	None
5	Woodworking Equipment	Sawdust Cyclone P7: 2,000 ft per acfm, Shavings Cyclone P11: 34,600 acfm Shavings Cyclone P12: 43,000 acfm Shavings Cyclone P13: 43,000 acfm Shavings Cyclone P14: 43,000 acfm Sawdust Cyclone P21: 2000 acfm
6	Emergency compression ignition engine Manufacturer: John Deere Model: 60811\F001 Rated Caoacity: 270 ho	None

List of insignificant activities at the facility, straight from the current Tier 1 permit. No changes are proposed with this renewal

Table 6.11 INSIGNIFICANT SOURCES

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b) citation
ST1	Truck bark bin	30
ST2	Truck sawdust bin	30
ST3	Truck chip bin	30
ST4	Boiler fuel storage	30
ST5	Auxiliary fuel bin	30
ST6	Shavings truck bin	30
ST1	Log yard waste 1	30
STS	Rock storage	30
ST9	Log yard waste 2	30
ST10	Ash storage	30
TR1	Hog in feed conveyor	30
TR2	Bark conveyor system	30
TR3	Hog out feed conveyor	30
TR4	Bark screen oversize	30
TR5	Deck trash conveyor	30
TR6	Truck bark bin conveyor	30
TR7	Boiler bark conveyor	30
TRS	Sawdust conveyor-vibrator	30
TR9	Chip oversize conveyor	30
TR10	Main fuel conveyor	30
TR11	Auxiliary fuel bin conveyor	30
TR12	Flyash transport	30
P1	Sawmill	30
P2	Small log debarker	30
P3	Large log debarker	30
P4	Bark hog	30
P5	Bark screen	30
PS	Chip screen	30
P9	Planing mill - new	30
PI0	Planing mill - old	30
S1	20,000-gallon diesel fuel tank	30
S2	20,000-gallon diesel fuel tank	30
S3	20,000-gallon gasoline tank	30
S4	2,500-gallon diesel fuel tank	30

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b) citation
S5	1,000-gallon stove oil tank	30
S6	30-gallon parts washer	30
S7	30-gallon parts washer	30
SS	30-gallon parts washer	30
S9	2,000-gallon aviation gas storage	30
S10	1,000-gallon used oil tank	30
STS	2,000 cubic yd. Rock storage	30

- 8.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in facility-wide permit conditions of this permit.
-

Appendix C

Emission Inventory and Emission Source Supporting Documents

The same information is presented in electronic form in spreadsheet
"BLP 063014 PTE.xls"

"

Acronyms

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

TRANSFER/CONVEYOR CALCULATIONS

CONVEYORS

Name	Code	Wind Spd (MPH)	Moisture (%)	Max Transf Rate (BDT/hr)	Transfer Rate (BDT/hr)	Throughput (BDT tons/yr)	Emission Factor* (lbs/ton)	Max PM (lb/hr)	Avg. PM (lb/hr)	PM (ton/yr)	Max PM 10 (lb/hr)	Avg. PM 10 (lb/hr)	PM 10 (ton/yr)	Operating hours
Hog Infeed Conveyor	TR 1	9	43	7.63	6.36	36,132	0.05910	0.45	0.38	1.13	0.16	0.13	0.39	6,000
Bark Conveyor System	TR 2	9	43	4.60	3.83	1,733	0.05910	0.27	0.23	0.05	0.10	0.08	0.02	452
Hog Outfeed Conveyor	TR 3	9	43	7.63	6.36	36,132	0.05910	0.45	0.38	1.13	0.16	0.13	0.39	6,000
Bark Screen Overs Conveyor	TR 4	9	43	0.69	0.58	3,457	0.05910	0.04	0.03	0.10	0.01	0.01	0.04	6,000
Deck Trash Conveyor	TR 5	9	50	0.36	0.30	1,800	0.04785	0.02	0.01	0.04	0.01	0.01	0.02	6,000
Truck Bark Bin Conveyor	TR 6	9	43	6.94	5.78	34,675	0.05910	0.41	0.34	1.02	0.14	0.12	0.36	6,000
Boiler Bark Conveyor	TR 7	9	43	5.54	4.61	27,675	0.05910	0.33	0.27	0.82	0.11	0.10	0.29	6,000
Sawdust Conveyor	TR 8	9	47	4.65	3.87	23,240	0.05218	0.24	0.20	0.61	0.08	0.07	0.21	6,000
Chips Overs/fines Conveyor	TR 9	9	47	0.65	0.54	3,262	0.05218	0.03	0.03	0.09	0.01	0.01	0.03	6,000
Main Fuel Conveyor	TR 10	9	43	4.20	3.50	29,981	0.05910	0.25	0.21	0.89	0.09	0.07	0.31	8,568
Aux Fuel Conveyor	TR 11	9	43	2.40	2.00	6,321	0.05910	0.05	0.04	0.19	0.02	0.02	0.07	8,568
Fly ash Transport	TR 12	9	5	0.05	0.04	351	1.20196	0.06	0.05	0.21	0.02	0.02	0.07	8,568
Total							2.6	2.2	6.3	0.9	0.8	2.2	2.2	

* Use AP 42 13.2.4 Aggregate Handling

$$E = k((0.032)^{(u/5)^{0.3}})((M/2)^{0.4})$$

particulate matter multiplier (k) = .35 for pim 10

average wind speed = 9 mph

at 50% moisture content

at 47% moisture content

at 43% moisture content

at 11.1% moisture content

at 5% moisture content

k=1 for PM

PM₁₀ EF = 0.0479 lbs/ton

PM₁₀ EF = 0.0522 lbs/ton

PM₁₀ EF = 0.0591 lbs/ton

PM₁₀ EF = 0.3935 lbs/ton

PM₁₀ EF = 1.2020 lbs/ton

Bin to Truck Transfers

Name	Code	PM Em. F (lb/ton)	PM-10 Em. F (lb/ton)	Throughput (BDT)	Transfer Rate (BDT/hr)	Control Efficiency	PM Emissions (tons/yr)	PM-10 Emissions (tons/yr)	Moisture Content	Operating hours	PM-10 Emissions (lbs/hr)
Bark Bin to truck	TR 13	0.0591	0.0207	7,000	0.8	75%	0.05	0.02	47%	8,568	0.00
Sawdust Bin to truck	TR 14	0.0591	0.0207	21,240	2.5	50%	0.31	0.11	47%	8,568	0.03
Chip bins to truck	TR 15	0.0591	0.0207	65,600	7.7	75%	0.48	0.17	47%	8,568	0.04
Shavings to Truck	TR 16	0.3935	0.1377	23,500	2.7	75%	1.16	0.40	11%	8,568	0.09
Fuel Refaced to Truck	TR 17	0.0591	0.0207	4,581	0.5		0.14	0.05	47%	8,568	0.01
Total							2.14	0.75		0.17	

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.

Modeled AS

BKSDFUGS
 BKSDFUGS
 CHSHFUGS
 CHSHFUGS
 BLRFUGS

Storage Calculations

PILES

Name	Code	Width Ft.	Length Ft.	Height Ft.	Area Acres	PM lb/acre/day Factor *	PM lb/acre/day Factor *	PM lbs/hr	PM tons/yr	120% average hrly PM 10 lbs/hr	PM 10 tons/yr	Assumptions
Boiler Fuel Storage	ST 4	50	75	20	0.09	9.35	4.68	0.0	0.15	0.020	0.07	1/2 active, 1/2 inactive
Log Yard Waste#1	ST 7	20	40	10	0.02	9.35	4.68	0.0	0.03	0.004	0.02	1/2 active, 1/2 inactive
Rock Storage	ST 8	75	140	10	0.24	0.00	0.00	0.0	0.00	0.000	0.00	inactive
Log Yard Waste#2	ST 9	30	100	5	0.07	9.35	4.68	0.0	0.12	0.016	0.06	1/2 active, 1/2 inactive
Ash Storage	ST 10	40	10	5	0.01	3.90	5.2	0.036	0.01	0.002	0.01	inactive, all PM 10 fines
Total									0.30			0.16

Modeled as
BLRFUGS
YARDFUGS
YARDFUGS
YARDFUGS
BLRFUGS

BINS

Name	Code	Thput (tons/yr)	PM E. Fact (lb/ton)	PM-10 E. Fact (lb/ton)	Control Efficiency	Max Trans (tons/hr)	Avg Trans (tons/hr)	Operat. Hrs/yr	120% PM max (lbs/hr)	PM (tons/yr)	PM-10 max (lbs/hr)	PM-10 (tons/yr)
Truck Bark Bin	ST 1	7,000	1.0	0.58	95%	50	25	8,568	0.0	0.175	0.028	0.102
Sawdust Bin	ST 2	21,240	1.0	0.58	95%	50	25	8,568	0.1	0.531	0.086	0.308
Truck Chip Bin	ST 3	65,600	1.0	0.58	95%	75	50	8,568	0.5	1.640	0.266	0.951
Aux Fuel Bin	ST 5	6,321	1.0	0.58	95%	2.4	2	8,568	0.0	0.158	0.026	0.092
Sawings Truck Bin	ST 6	23,500	1.0	0.58	95%	50	25	8,568	0.1	0.588	0.095	0.341
Total									0.8	3.1	0.5	1.8

Modeled as
KSDFFUGS
BKSDFFUGS
CHSHFUGS
BLRFUGS
CHSHFUGS

Note: All storage bins are enclosed, with small vent openings for air. (assume 95% effci).

Solvent Calculations

Name	Code	Throughput (gallons)	E. Factor (lb/1000 gal)	Total		VOC's (tons/yr)
				HAPS (tons/yr)	HAPS (tons/yr)	
Diesel Tank 1	S 1	175,000	0.02	0.00E+00	1.8E-03	No Haps 139413
Diesel Tank 2	S 2	175,000	0.02	0.00E+00	1.8E-03	No Haps 139412
Gasoline Tank	S 3	30,000	8.2	* 7.71E-02	1.2E-01	23400
#1 Diesel Tank	S 4	900	0.02	5.76E-06	9.0E-06	600
Stove Oil Tank	S 5	11,000	0.02	7.04E-05	1.1E-04	9677
Parts Washer	S 6	tons/yr/unit :	0.330	* 1.72E-04	1.7E-02	assume 95% efficiency-closed lid, 1 unit. tons/yr/unit :
Parts Washer	S 7	tons/yr/unit :	0.330	* 1.72E-04	1.7E-02	assume 95% efficiency-closed lid, 1 unit. tons/yr/unit :
Parts Washer	S 8	tons/yr/unit :	0.330	* 1.72E-04	1.7E-02	assume 95% efficiency-closed lid, 1 unit. tons/yr/unit :
Aviation Gas	S 9	2,500	0.03	0.00E+00	3.8E-05	No Haps 1800
Used Oil Tank	S 10	4,500	Insig Activity	Insig Activity	0.0E+00	insignificant activity 3360
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

annual steam production limit average **46500** lbs/hr
 assuming 8760 hrs operation/yr **#####** lbs steam/yr

0.67 efficiency
 1050 BTU/lb steam
 6.38E+11 BTU/yr
 6.38E+05 MMBtu/yr

36302 BDT/yr
 63687 GT/yr

Max short term steaming rate

56000 lbs/hr
 0.67 efficiency
 1050 BTU/lb steam
 8.78E+07 BTU/hr
 8.78E+01 MMBtu/hr
 4.99 BDT/hr
 8.76 GT/hr

Pollutant	Emission Factor	Oper.	Units	Emissions (tons/yr)	Max lbs/hr
Particulate	27.00 lb/hr	8,760	hrs	99.48	27.00
PM 10	27.00 lb/hr	8,760	hrs	99.48	27.00
PM 2.5	27.00 lb/hr	8,760	hrs	99.48	27.00
SO 2	0.025 lbs/10 ⁶ Btu	638,369	mmbTU/yr	7.98	2.41
CO	0.60 lbs/10 ⁶ Btu	638,369	mmbTU/yr	249.00	
NOx	0.22 lbs/10 ⁶ Btu	638,369	mmbTU/yr	70.22	21.24
VOC	0.038 lbs/10 ⁶ Btu	638,369	mmbTU/yr	12.13	3.67
Carbon Dioxide (CO ₂ compound)	206.8 lbs/10 ⁶ Btu	638,369	mmbTU/yr	68007.32	
Methane (CH ₄)	1.5 lbs/10 ⁶ Btu	638,369	mmbTU/yr	478.78	
Nitrous Oxide (N ₂ O)	2.9 lbs/10 ⁶ Btu	638,369	mmbTU/yr	925.63	
CO2 eq	211.2 lbs/10 ⁶ Btu	638,369	mmbTU/yr	67411.73	

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

BTU and moisture content calculations

	2003	
5368 BTU/gr lb -> White fir hog fuel 2003 @	0.465	mc
4847 BTU/gr lb -> Red Fir hog fuel 2003 @	0.46	mc
3930 BTU/gr lb -> Cedar Fir hog fuel 2003 @	0.489	mc
4848.3 average BTU/gr lb	0.471333	
8792.6 average BTU / BD lb		
17585120 average BTU / BDT		
17.59 average MMBtu/ BDT		

0.4713 47,837 gt in 2003 (no shavings)

avg of 3 hog fuels: 4648.3 Btu/gr lb

CO2 equiv Efs from EPA Region 10 Regulated NSR Air Pollutant Potential to Emit Emission Factors for Wood Residue-fired Boilers.

Boiler Haps Emissions

Previously permitted 665 596 Proposed (mm BTU/hr) 636 760
 Proposed (mm BTU/hr) 636 760
 Proposed (mm BTU/hr) 636 760

Pollutant	Emission Factor (lb/hr)	Throughput (lb/hr)	Units	IDAPA			Increase in HAP emissions		Total HAP Emissions		EPA HAP Emissions		HAP values after Proposed Action	
				585 EL (lb/hr)	596 EL (lb/hr)	Max Emission Increase (lb/hr)	Avg Emission Increase (lb/hr)	Total HAP Emissions (ton/yr)	Total HAP Emissions (ton/yr)	585 EL (lb/hr)	596 EL (lb/hr)	585 A/C up/yr3	596 A/C up/yr3	
Acetaldehyde	8.1E-07	193.841	lb/hr	NA	NA	2.41E-03	2.01E-05	0.000	0.000	0.000	0.000	no	no	
Acetone	6.0E-04	193.841	lb/hr	NA	NA	1.33E-04	1.11E-04	0.000	0.000	0.000	0.000	no	no	
Acrolein	8.3E-04	193.841	lb/hr	NA	NA	3.02E-03	2.22E-02	1.82E-02	0.000	0.000	0.000	no	no	
Acrylonitrile	1.9E-04	193.841	lb/hr	NA	NA	5.04E-03	4.72E-03	0.018	0.000	0.000	0.000	no	no	
Acrylonitrile	3.2E-09	193.841	lb/hr	NA	NA	8.43E-08	7.97E-08	0.000	0.00000	0.000	0.00000	no	no	
Acrylonitrile	4.0E-03	193.841	lb/hr	1.0E-02	NA	1.06E-01	8.84E-02	0.387	0.33728	1.277	1.27674	yes	no	
Acrylonitrile	3.0E-04	193.841	lb/hr	NA	NA	7.89E-05	6.93E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.5E-07	193.841	lb/hr	NA	NA	2.28E-05	1.97E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	3.3E-09	193.841	lb/hr	NA	NA	8.92E-09	7.92E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	4.7E-09	193.841	lb/hr	NA	NA	1.32E-08	1.14E-08	0.000	0.00000	0.000	0.00000	no	no	
Acrylonitrile	1.1E-03	193.841	lb/hr	NA	NA	2.94E-02	2.52E-02	0.000	0.00000	0.000	0.00000	no	no	
Acrylonitrile	5.4E-05	193.841	lb/hr	NA	NA	1.42E-04	1.24E-04	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-05	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	4.8E-01	193.841	lb/hr	NA	NA	4.42E-04	1.17E-03	0.004	0.00438	0.014	0.01413	no	no	
Acrylonitrile	1.8E-04	193.841	lb/hr	0.2	NA	2.71E-02	1.77E-01	0.078	0.07848	0.282	0.28218	no	no	
Acrylonitrile	3.3E-05	193.841	lb/hr	NA	NA	8.75E-04	7.28E-04	0.003	0.00030	0.011	0.01093	no	no	
Acrylonitrile	2.8E-05	193.841	lb/hr	NA	NA	2.89E-04	7.42E-04	0.003	0.00211	0.009	0.00884	no	no	
Acrylonitrile	2.2E-05	193.841	lb/hr	NA	NA	8.90E-04	7.28E-04	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	2.92E-04	7.69E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-09	193.841	lb/hr	NA	NA	1.92E-08	1.54E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-04	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.1E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	9.9E-09	193.841	lb/hr	NA	NA	2.87E-04	2.19E-04	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	7.7E-10	193.841	lb/hr	NA	NA	7.18E-09	5.97E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	8.1E-10	193.841	lb/hr	NA	NA	2.41E-07	2.01E-07	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	8.8E-05	193.841	lb/hr	NA	NA	1.49E-03	1.22E-03	0.005	0.000	0.018	0.018	no	no	
Acrylonitrile	7.4E-10	193.841	lb/hr	NA	NA	1.05E-08	1.84E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.9E-05	193.841	lb/hr	NA	NA	2.92E-04	7.69E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-04	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	9.9E-09	193.841	lb/hr	NA	NA	2.87E-04	2.19E-04	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.00001	0.011	0.01078	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-06	193.841	lb/hr	NA	NA	1.24E-05	3.54E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-06	193.841	lb/hr	NA	NA	1.02E-05	7.62E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-03	193.841	lb/hr	NA	NA	8.10E-04	5.97E-02	0.000	0.00032	0.000	0.00028	no	no	
Acrylonitrile	8.8E-11	193.841	lb/hr	NA	NA	1.72E-09	1.41E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	6.8E-10	193.841	lb/hr	NA	NA	1.49E-08	1.22E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-08	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-06	193.841	lb/hr	NA	NA	1.24E-05	3.54E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-06	193.841	lb/hr	NA	NA	1.02E-05	7.62E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-03	193.841	lb/hr	NA	NA	8.10E-04	5.97E-02	0.000	0.00032	0.000	0.00028	no	no	
Acrylonitrile	8.8E-11	193.841	lb/hr	NA	NA	1.72E-09	1.41E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	6.8E-10	193.841	lb/hr	NA	NA	1.49E-08	1.22E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-08	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-06	193.841	lb/hr	NA	NA	1.24E-05	3.54E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-06	193.841	lb/hr	NA	NA	1.02E-05	7.62E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-03	193.841	lb/hr	NA	NA	8.10E-04	5.97E-02	0.000	0.00032	0.000	0.00028	no	no	
Acrylonitrile	8.8E-11	193.841	lb/hr	NA	NA	1.72E-09	1.41E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	6.8E-10	193.841	lb/hr	NA	NA	1.49E-08	1.22E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-08	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-06	193.841	lb/hr	NA	NA	1.24E-05	3.54E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-06	193.841	lb/hr	NA	NA	1.02E-05	7.62E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-03	193.841	lb/hr	NA	NA	8.10E-04	5.97E-02	0.000	0.00032	0.000	0.00028	no	no	
Acrylonitrile	8.8E-11	193.841	lb/hr	NA	NA	1.72E-09	1.41E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	6.8E-10	193.841	lb/hr	NA	NA	1.49E-08	1.22E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-08	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.1E-05	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-06	193.841	lb/hr	NA	NA	1.24E-05	3.54E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-06	193.841	lb/hr	NA	NA	1.02E-05	7.62E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	2.1E-03	193.841	lb/hr	NA	NA	8.10E-04	5.97E-02	0.000	0.00032	0.000	0.00028	no	no	
Acrylonitrile	8.8E-11	193.841	lb/hr	NA	NA	1.72E-09	1.41E-09	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	6.8E-10	193.841	lb/hr	NA	NA	1.49E-08	1.22E-08	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	7.1E-08	193.841	lb/hr	NA	NA	1.33E-03	7.12E-03	0.001	0.000	0.000	0.000	no	no	
Acrylonitrile	3.9E-05	193.841	lb/hr	NA	NA	1.72E-04	1.41E-04	0.000	0.000	0.000	0.000	no	no	
Acrylonitrile	1.8E-07	193.841	lb/hr	NA	NA	4.77E-05	4.12E-05	0.000	0.000	0.000	0.000	no	no	
Acrylonitr														

Total Potential Emissions - Bennett Lumber

Non-fugitive Emissions

Source	Particulate (tons/yr)	PM 10 (tons/yr)	PM2.5 (tons/yr)	VOC's (tons/yr)	SO 2 (tons/yr)	CO (tons/yr)	NOx (tons/yr)
Dry Kilns	3.94	3.94	3.94	110.31	NA	NA	NA
Process (excl kilns)	11.74	9.29	8.59	0.00	NA	NA	NA
Generator	0.00	0.00	0.00	0.01	0.00	0.02	0.73
Boiler	99.48	99.48	99.48	12.13	7.98	249.00	70.22
Subtotal	115.2	112.7	112.0	122.4	8.0	249.0	71.0

Fugitive Emissions

Source	Particulate (tons/yr)	PM 10 (tons/yr)	PM2.5 (tons/yr)	VOC's (tons/yr)	SO 2 (tons/yr)	CO (tons/yr)	NOx (tons/yr)
Fugitive - Roads	1.00	3.60	0.54	NA	NA	NA	NA
Transfer - Conveyors	6.27	2.19	1.10	NA	NA	NA	NA
Transfer - Trucks	2.14	0.75	0.37	NA	NA	NA	NA
Storage - Piles	0.30	0.16	0.02	NA	NA	NA	NA
Storage - Bins	3.09	1.79	0.90	NA	NA	NA	NA
Solvents	NA	NA	NA	0.18	NA	NA	NA

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

Pollutant	EF	Hrs/yr	Units	Convert EF to lbs/hp/hr	lb/yr	tons/yr @	
						500 hrs/yr	Max lb/hr avg lb/hr
CO	0.15	500	g/hp-hr	0.000331	45	0.02	0.09
PM	0.021	500	g/hp-hr	4.63E-05	6	0.00	
PM10	0.015	500	g/hp-hr	3.29E-05	5	0.00	0.01
PM2.5	0.014	500	g/hp-hr	3.18E-05	4	0.00	0.01
VOC *	0.04	500	g/hp-hr	8.82E-05	12	0.01	0.02
NOx	4.83	500	g/hp-hr	0.010648	1,464	0.73	2.93
SOx	0.002	500	lb/hp-hr	4.46E-06	1	0.000	0.00

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

0.8

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 71426.16 71.4

kg/Mmbtu

kg/hr

kg/yr

Metric tons/yr

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

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

0.103

Emissions in AP-42 are < values listed

Appendix D

Permit Application Supporting Documents

Attachment 1

Permit required plans or O&M Manuals: Boiler and Emission Control System O&M Plan

Bennett Lumber Products, Inc., Princeton facility Operations and Maintenance Plan for Boiler and Emission Control Systems

Coordination Manual

The IDEQ Tier I and Tier II air permits for the Bennett Lumber Products, Inc., Princeton, Idaho facility include emission control systems for the facility boiler, dry kiln, and woodworking equipment operations. Each emissions control system is required to be in operation when the facility system it supports is up and running. Many of those systems have monitoring and data reporting requirements. Manufacturer's operational manuals are available at each project work site.

This manual documents IDEQ permit requirements, allowable ranges for required monitoring, and guidance on where to find the manufacturer's operational and maintenance guidance for each permit required emission control system. The required emission control systems and monitoring are documented below by process or building.

ZURN INDUSTRIES HOG FUEL BOILER

The boiler is required to be fired only by wood products. Emission control devices on that source include a multi-clone in series with a wet scrubber and cyclone separator. The facility has prepared, and submitted for review by IDEQ, an operations and maintenance manual for air pollution control equipment at the facility.

Maximum steam production rate allowed is 60,000 lb/hr based on the most recent source test (7/28/10 and 8/5/10). Pressure drop across the wet scrubber is required to be between 3.0" – 7.5" H₂O. Scrubber flow rate is required to be above 350 gallons of water per minute. A new source test is required by 8/5/15. We can not change allowable scrubber media flow or pressure drops unless we first justify them by showing compliance during a source test.

The monitors are audited and calibrated annually during the annual boiler shutdown by McCune's Instruments of Spokane. McCune's Instruments is contracted for boiler operational or maintenance support as needed. These consultants can be called in case of any operational difficulties or questions, preferably after consultation with the plant engineer.

Documentation on operation and maintenance of the boiler and control panel monitors is found in the boiler operating room in the following manuals:

- 2 copies of the Steam Engineering Boiler O&M manual
- 2 copies of Boiler Instruction Manual
- a UDC 3000 Universal Digital Controller Product manual

- NALCO program administration manual

DRYING KILNS

The primary permit requirement is to operate the dry kilns efficiently to minimize visible and HAP emissions and odors. The dry kilns are provided by Coe Manufacturing and Wellons. They all feature fully computerized controls. Blueprints and specifications and operating and maintenance manuals are in the control room. The plant engineer should be contacted in the case of any unusual or upset conditions.

Visible emissions are not allowed to exceed 20% opacity for more than 3 minutes in any hour. The IDEQ permit(s) require quarterly visible emission test documentation, if there are visible emissions, and documentation. This documentation is recorded and maintained by the facility engineer.

WOODWORKING EQUIPMENT (and associated cyclones and baghouses)

The baghouses and cyclones through which the sawmill and related processes vent has the same requirements for efficient operation and visible emissions as the dry kilns. Guidance on the operation and maintenance of the baghouses and cyclones is available in the sawmill and/or from the plant engineer

Attachment 2

Permit required plans or O&M Manuals: CAM Plan, Cyclone and Baghouse Procedures Manual, Cyclone and Storage Bins Procedures Manuals

Bennett Lumber Products, Princeton, Idaho facility Compliance Assurance Monitoring (CAM) Plan

IDAPA 58.01.01 and US Environmental Protection Agency (EPA) 40 CFR 64 regulations require a Compliance Assurance Plan for each piece of equipment or emission source at any Title V facility that has the potential to exceed the major source emissions threshold without emission controls. Those CAM Plan requirements apply to one emission source category at the Bennett Lumber Products, Princeton, Idaho facility: boiler emissions from the Zurn Industries Hog-Fuel Boiler and that boiler's associated emission control devices.

This document contains the CAM plan required for the Zurn Industries Hog-Fuel Boiler at Bennett Lumber Products, meeting the requirements of the 40 CFR 64 requirements. Emission control devices on the boiler source include a multiclone in series with a wet scrubber. The facility has prepared, and will maintain, operations and maintenance manuals for the multiclone and wet scrubber.

To document compliance with permit conditions and applicable emission limits for the Zurn Industries Hog-Fuel Boiler, the following strategies will be utilized:

I. Indicator	I.D. Fan Outlet (Scrubber Inlet) Pressure	Wet Scrubber Water Flow
Measurement Approach	The ID fan outlet pressure gauge is located at the ID fan outlet just upstream of the wet scrubber inlet. It represents the pressure drop across the wet scrubber, because pressure downstream of the scrubber is zero since it exhausts to the atmosphere.	The scrubber water flow is measured using a flow meter located in the water supply header to the scrubber nozzles. Scrubber flow is determined by direct observation of the meter gauge
II. Indicator Ranges	An excursion is defined as a pressure of less than 3.0 inches of water or greater than 7.5 inches of water	An excursion is defined as a scrubber water flow of less than 350 gpm
II. Performance Criteria		
A. Data representativeness	The ID fan outlet pressure is located upstream from the wet scrubber. The monitor gauge is marked in 0.5 in. H ₂ O increments.	The scrubber water flow meter is located in the water supply header. Manufacturer's specifications indicate the gauge is accurate to +/- 5% of actual flow
B. Verification of Operational Status	n/a	n/a
C. QA/QC practices and Criteria	Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation	No calibration required per manufacturer's specifications. Instrument is observed daily, troubleshooting, maintenance, or replacement will be initiated at any sign of questionably effective operation
D. Monitoring Frequency	The ID fan outlet pressure is monitored continuously and recorded twice daily	The wet scrubber water flow is monitored continuously and recorded twice daily

Data Collection Procedures	Manually recorded in the boiler operating log	Manually recorded in the boiler operating log
Averaging Period	Instantaneous limit, not to be outside range at any time	Instantaneous limit, not to be below minimum value at any time

CYCLONE AND BAGHOUSE/FILTER SYSTEM PROCEDURES

According to Permit Condition 5.6 in our Permit to Construct No. P-2007.0107, Bennett Lumber Products is required to develop a Cyclone and Baghouse/Filter System Procedures document for the inspection and operation of the cyclones and baghouse/filter system which controls PM and PM10 emissions from woodworking equipment at its Princeton, Idaho facility. During a PTC informational meeting at DEQ's regional office in Lewiston on October 28, 2009 between BLP's Jeff Abbott and Earl Britt and DEQ's Clayton Steele and Amber Rand, it was agreed upon that rather than submit System Procures documents and O&M manuals to DEQ for approval, an email summary would be sufficient outlining how BLP will satisfy Permit Condition 5.6.

Bennett Lumber has O&M manuals on site for its cyclones, storage bins, and baghouse system. The manuals for the cyclones and storage bins are quite short as their operation and maintenance are rather simplistic in nature. Manuals for the baghouse system have been developed by the equipment manufacturer. These manuals will be made available to the DEQ upon request.

Bennett Lumber will conduct a monthly facility-wide inspection of potential sources of visible emissions, including cyclones, storage bins and our baghouse system, during daylight hours and under normal operating conditions. The inspections shall consist of a see/no see evaluation for each potential source of visible emissions. If any emissions are present from any point of emission, BLP will either

- a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, BLP will conduct a see/no see evaluation of the emission point in question. If the visible emissions are not eliminated, BLP will comply with b)

Or

- b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations will be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, BLP will take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The monthly inspection will also check for structural integrity of the above potential emission sources, and determine if or when scheduled maintenance will be needed.

For the baghouse system, BLP currently performs weekly maintenance according to the manufacturer's recommendations. During this weekly inspection the pressure drop across the filter is recorded. This is the primary indicator as to the baghouse's efficiency. Bags are cleaned according to these results. The baghouse system at BLP is a convenience added to its sawmilling operations, NOT a necessity. During our monthly inspections if visible emissions are

determined to be 10% or greater, or if problems with its operation are encountered, we can simply shut off the baghouse system until corrections can be made.

Bennett Lumber will maintain records to satisfy PTC Permit Condition 5.6 in accordance with General Provision 7.

CYCLONES

Operation and Maintenance Manual

General Description-

Bennett Lumber Products has seven cyclones:

<u>DEQ Ref.#</u>	<u>Cyclone Type</u>	<u>Location</u>
P6	Baghouse cyclone	Top of boiler building
P7	Sawdust cyclone	Top of boiler building
P11	Shavings cyclone	New planer (for old planer)
P12	Shavings cyclone	New planer
P13	Shavings cyclone	Top of shavings bin
P14	Shavings cyclone	Top of boiler building
P24	Baghouse	South side of sawmill

When shavings, sawdust or chips are being transferred from one location in the plant to another, a high-pressure air feeder system is used to move the material through a blowpipe. When the material reaches its destination the blowpipe enters into a cyclone. Cyclones are used for pulling material out of the high-pressure air stream while exhausting that high-pressure airflow safely to the atmosphere. The material falls under gravity through the bottom of the cyclone into some type of storage unit. The quantity of material through a particular cyclone depends on several factors. The type of lumber species being ran through the sawmill, the size of the lumber being processed, and how much of that material is burned to produce steam are just a few.

Normal Operating Conditions-

The cyclones operate two shifts, five days per week. Under normal conditions material flows through the cyclones with no obstructions to its designated storage unit.

Startup-

Material will be transported through a cyclone whenever the sawmill or planer is in operation and that particular cyclone's high-pressure feeder is activated. The blower to the feeder unit should be turned on before material is allowed to enter into the blowpipe to prevent a pipe from being plugged.

Shutdown-

Whenever the sawmill or planer ceases to operate or a particular cyclone's high-pressure feeder system turned off, material will no longer flow through that cyclone.

Maintenance-

Material constantly flowing through a cyclone is very abrasive. Over time the wall thickness of the cyclone will become so thin that holes or cracks will form. When this happens, either a patch needs put over the thin area or if need be, a section of the cyclone taken out and replaced. Extreme caution should be taken when welding or cutting on a cyclone. The fine dust and dry material inside is very susceptible to catching fire. Water should be used to thoroughly wet down the area and a person should be designated as fire watch when all work is taking place.

Occasionally material will build up on the top of the cyclone where the air is exhausted. This material needs periodically removed by either shoveling or washing off with a water hose. The later of the two is preferred to prevent excess material from becoming airborne.

Upset Conditions-

One possible upset condition was discussed above dealing with a thin or cracked sidewall of a cyclone. Other upset conditions might include a cyclone that builds up material inside and plugs or excessive dust being exhausted into the atmosphere from the top of a cyclone.

Corrective Procedures-

In the event of a plugged cyclone, inspection doors located on the sidewalls should be removed and the material unplugged using rods or shovels. The material should be allowed to fall out the bottom of the cyclone into its storage unit below. In the event of excess dust being exhausted from a cyclone, a water spray system should be installed to prevent this from occurring. This type of system is already present on a few shavings cyclones in the planer.

Emergency Shutdown-

In the event of an emergency shutdown, the high-pressure air feeder system responsible for transporting material to a particular cyclone should be shut down. This equipment should be properly locked out and tagged out until the emergency situation can be corrected.

In the planer, the shavings cyclones are protected from fire by a Gre-con spark detection/extinguishing system. This system consists of three 24 GPM nozzles that will detect and extinguish a spark as needed. This prevents a fire from traveling downstream to a storage bin where a large amount of material is usually stored. In the event the Gre-con system should fail and a fire does start in a cyclone or storage unit, the cyclone's high-pressure air feeder system should be shut down at once and the fire brigade notified.

STORAGE BINS

Operation and Maintenance Manual

General Description-

Bennett Lumber Products has ten storage bins:

<u>DEQ Ref#</u>	<u>Bin Type</u>	<u>Location</u>
TR 13	Bark	South side of Sawmill
TR 14	Sawdust	“ “
TR 15	Chips (four)	“ “
TR 16	Shavings (four)	“ “

Four are chip bins (TR15), four are shavings bins (TR16), one is a sawdust bin (TR14), and one is a hog fuel (bark) bin (TR13). All bins are located on the south side of the sawmill building. The bins are used for material storage until it can be loaded into a semi truck for highway transportation. The quantity of each material depends on the lumber species being processed and how much of that material is burned in the boiler to produce steam. Material enters the bins under high pressure from one of our manufacturing sites or by belt conveyor. The material is gravity loaded into trailers via bottom discharge jaws which are operated hydraulically.

Normal Operating Conditions-

Under normal conditions a semi truck will pull underneath the bin from which they are loading. The hydraulic power unit must be turned on for that particular bin. The truck operator will then open the bottom discharge jaws releasing the material in the bin until the trailer is full. The jaws are then closed and the power unit turned off.

Startup-

Whenever the sawmill or planer is in operation, material will be transferred either by under high pressure or belt conveyor into the bins.

Shutdown-

Whenever the sawmill or planer ceases to operate, material will no longer flow into the bins.

Maintenance-

The storage bins are a very low maintenance item. The hydraulic power unit and system need to be maintained by qualified personnel.

Upset Conditions-

- 1) Filling the bin to capacity
- 2) Fire inside a bin
- 3) Bottom discharge jaws fail

Corrective Procedures-

- 1) If a bin is filled to capacity more trailers are needed to haul the material to its destination.
- 2) If there is a fire inside a bin the material flow into the bin must be stopped. In order to extinguish the fire the entire capacity of the bin will need to be slowly dumped on the ground below and soaked with water via fire hoses. After the fire has been completely extinguished the material will be hauled for landfill application with other logyard waste.
- 3) If the bottom discharge jaws fail, they will either fail in the open or closed position. If open, the trailer needs to be moved immediately and the material flow into the bin stopped. Keep all personnel away from under the bins to prevent being buried by material. If the jaws fail in the closed position the most likely cause will be a faulty hydraulic power unit.

Emergency Shutdown-

In case of an emergency the discharge jaws should be closed and the power to the hydraulic unit should be turned off. If for some reason the jaws will not close, the high-pressure feeder system transporting material to that bin should be turned off.

Attachment 3

IDEQ Tier 1 Operating Permit Application Completeness Checklist, including documentation on where to find each required component in the application package

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.

How these requirements are met by this application is documented below each requirement, in red italics

1. **General Facility Information**

- Complete and sign the Tier I Application and General Information Cover Sheet (Form GI/CS)

This application documents completion of this requirement

2. **Applicable Equipment-Specific Application Forms**

- Complete all applicable equipment-specific applications forms. For all forms listed below, please visit DEQ's website at www.deq.idaho.gov/permitting/air-quality-permitting/forms-checklists.aspx.

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)**
- Form VSCE (Venturi Scrubber Control Equipment)

Industrial Category Specific

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

Emissions Unit Specific

- **Form EU0 (General Emissions Unit)**
- **Form EU1 (Industrial Engine)**
- Form EU3 (Spray Paint Booth)
- Form EU4 (Cooling Towers)
- **Form EU5 (Boilers)**

Compliance Assurance Monitoring

- **Form CAM (Compliance Assurance Monitoring). Refer to 40 CFR 64**

Emissions Inventory

- **Forms EI-CP (1 – 4) (Emissions Inventory Workbook)**

Other Applicability Forms

- **Form GI and CSTI (Tier I Operating Permit Application General Information and Cover Sheet)**
- **Form FRA (Federal Requirements Applicability)**

All applicable forms are in Attachment A, or their location is referenced there

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.

- **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**

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.

Section 4 of the application documents all applicable regulations

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 operating permit issuance date. For each permit condition determined to be obsolete, thoroughly explain the decision to omit an obsolete permit condition in the statement of basis.

Obsolete permit conditions, if any, and recommendations for resolution, are identified in Section 8 Requested Permit Conditions

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.

Section 4 of the permit application documents applicable and non applicable regulations. Detailed analyses of federal Subpart JJJJJ and Subpart ZZZZ regulations are provided.

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.

No alternative operating scenarios other than those already permitted are proposed.

8. 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.

As documented in Section 4 of the application, the Acid Rain Program requirements do not apply to this facility

9. Compliance Certifications

- Provide a compliance certification regarding the compliance status of each emissions unit at the time the application is submitted to the DEQ that:
- 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.
 - 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

AQ-C1 - C2 forms document current compliance with all applicable permit requirement. They can be found in Appendix A. As noted in the text, AQ-C3 to C5 semi-annual monitoring reports were filed for the period January - June 2014. As of permit application finalization 8/6/2014, no permit deviations were noted for the second half of 2014. Annual and semi-annual reporting document historic compliance.

10. Compliance Plans

- Provide a compliance description as follows:
- F
or each applicable requirement with which the emissions unit is in compliance, state that the emissions unit will continue to comply with the applicable requirement.
 - 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.

No applicable Compliance Plan

11. 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.

No applicable compliance schedule

12. 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 that is relevant to the trading scenario and all the information required by Section 440, if applicable. Em
- Provide proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. Emissions trades involving emissions units for which the emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trade shall not be approved.

No requested trading scenarios

13. 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).

A list of insignificant activities consistent with that in our existing IDEQ Tier 1 air operating permit is included in Appendix B

14. 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.

As documented in Section 4 of the application, the Acid Rain Program requirements do not apply to this facility

15. 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.

No permit shield is being requested, unless already included in our existing Tier 1 air operating permit, in which case we request no change from current conditions

16. Documents for Public Comment

- 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.

The applicable permit required plans seem to be the facility's CAM Plan, O&M Plan for the Boiler and Emission Control Equipment, Cyclone and Baghouse / filter System Procedures manual, and O&M manuals for facility cyclones and Storage Bins and the CAM Plan. Copies of those documents, previously approved by IDEQ, are enclosed earlier in Appendix D

17. 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 certification signature on Form GI and in the cover letter provide the required certification for this application and all its contents

18. 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

This submittal meets this requirement

Attachment 4

Compliance Certification

The compliance certification is on IDEQ forms AQ-C1 and C2, in Appendix A. Semi-annual compliance forms AQ-C3 - C5 were filed in July for the first half 2014. No permit deviations have been observed between the end of the first half of 2014 and 8/5/2014 as this application was being finalized. The electronic versions of the AQ-C1 and C2 forms are in the directory IDEQ Permit Form