PLUMMER FOREST PRODUCTS
PARTICLEBOARD PLANT

June 22, 2011

Bill Rogers, P.E.
Idaho Department of Environmental Quality
Air Quality Division
1410 N. Hilton
Boise, ID 83706
Tel: (208) 373 – 0502

Re: Plummer Forest Products, Post Falls
Facility ID No. 055-00018

Dear Bill,

Plummer Forest Products, Inc. (PFP) is submitting the enclosed Tier I Permit Renewal application for the PFP particleboard plant in Post Falls, Idaho. Our air quality consultant, Diane Lorenzen, contacted you on May 19 to discuss the items needed for a complete Tier I renewal application.

The PFP particleboard plant is regulated under Tier I Operating Permit No. T1-2010.0040, which was amended on April 22, 2010. The Tier I permit expires on January 17, 2012 and the renewal application is due by July 17, 2011. The application includes Form CSTI, a signed Form GI, Form FRA with attachments and Form CAM for the sander-dust boiler.

While reviewing the current Tier I permit, PFP found that compliance assurance monitoring (CAM) conditions had been included for non-CAM sources. Attachment A to this letter contains a detailed explanation of CAM applicability for each emissions source at the PFP facility. PFP requests the following changes to the renewed Tier I permit for the Post Falls particleboard plant.

PFP requests that Table 1.1 of the permit be modified as follows:

a. Delete reference to the "outside silo high pressure air system baghouse BH-5A." This baghouse is the same as BH-4.
b. Refer to the east sawline baghouse as BH-9 (not BH-10A).

PFP requests that Section 5 of the permit be modified to eliminate references to the CAM rules where they are not applicable. As discussed in Attachment A, the CAM rules do not apply to any of the emissions sources listed in Section 5 of the permit.

PFP has found that the pressure drop monitoring required by the permit does not provide reliable information regarding baghouse performance. PFP is proposing more frequent visible emissions monitoring, in lieu of pressure drop monitoring, for the emissions sources listed in Table 5.1.

PFP requests the following changes to Section 5 of the permit.

1. Modify Table 5.1 as follows:
   a. Delete reference to the "outside silo high pressure air system baghouse BH-5A." This baghouse is the same as BH-4.
   b. Refer to the east sawline baghouse as BH-9 (not BH-10A).

2. Eliminate Condition 5.5 which requires pressure drop monitoring for sources listed in Table 5.1. In lieu of pressure drop monitoring, PFP is proposing weekly visible emissions monitoring for the sources listed in Table 5.1.

3. Eliminate Conditions 5.7, 5.8, 5.9, 5.10, 5.13, 5.15 and 5.16. All these conditions are designed to implement the CAM rule. The CAM rule does not apply to any of the equipment listed in Table 5.1, as explained in Attachment A.

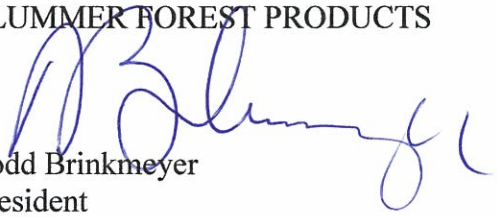
4. Modify Condition 5.14 to increase the frequency of the visible emissions monitoring to weekly. Eliminate the provision to reduce the frequency of observations. Remove the citation of 40CFR64.6 for this condition because CAM does not apply.

This Tier I permit renewal application is due by July 17, 2011. Please contact Jeff Carlson at (208) 773-7521 or Diane Lorenzen at (406) 203-0704 if you have any questions about the application materials.

Signature by Responsible Official

Based on the information and belief formed after reasonable inquiry, the statements and information contained herein are true, accurate and complete, to the best of my knowledge.

Sincerely,
PLUMMER FOREST PRODUCTS



Todd Brinkmeyer
President

Attachment
Enclosures

CC Jeff Carlson, Plummer Forest Products
Diane Lorenzen, Pioneer Technical Services

ATTACHMENT A
CAM Applicability for Plummer Forest Products

This attachment to the Plummer Forest Products (PFP) Tier I permit renewal application discusses the applicability of the Compliance Assurance Monitoring (CAM) rule to specific emitting units. The CAM Rule applies to each pollutant-specific emissions unit that:

- Is located at major source subject to Title V operational permits program, and
- Is subject to emission limitation and has a control device to meet that limit (e.g., ESPs, scrubbers, fabric filters), and
- Has pre-control emissions >major source size threshold (e.g., >100 tons/year uncontrolled emissions).

The PFP particleboard plant in Post Falls is a defined as a major source under the Title V, Idaho Tier I, permitting program. A discussion of CAM applicability to emissions equipment follows.

Sander-dust Boiler

The sander-dust boiler is subject to particulate matter emission limits, and uses a multiclone and electrostatic precipitator (ESP) to meet that limit. The sander-dust boiler likely has pre-control emissions of more than 100 tpy of particulate matter. Therefore, the CAM regulations apply to the sander-dust boiler, and a Form CAM has been provided for the sander-dust boiler multiclone and ESP.

Existing Baghouse Pressure Drop Monitoring Requirement

Permit condition 5.5 requires that the pressure differential across each emission control device listed in Table 5.1 shall be maintained within the manufacturer and O&M manual recommendations and specifications. The references for this condition are PTC No. P-2010.0042, 4/22/10, and 40CFR64.6, which is a citation for the Compliance Assurance Monitoring rules.

PFP has complied with the baghouse pressure drop monitoring requirements since they were added to the permit. However, PFP environmental personnel do not believe the pressure drop monitoring provides useful information on the status of the baghouse operations. The pressure drop reading on the magnehelic gauge only indicates whether the baghouse needs to be changed or is plugged. The staff feels that the pressure drop reading has no bearing on dust emissions because neither of those situations puts any dust to atmosphere. Dust emissions only occur when the baghouse has lost a bag or a bag has a hole. PFP is proposing weekly visual inspections which will be much more useful in indicating whether a baghouse has developed an emissions problem.

Unit-Specific CAM Applicability

CAM requirements apply to equipment that has an emission limit and uses control equipment to meet that limit. All the particulate emitting sources are subject to process weight and opacity limits, so CAM could potentially apply to any PM source. However, not all of the PM sources use control equipment to meet the emissions limit. In many cases, the baghouses used at the PFP are part of the dry material handling system and are actually process equipment. In cases where the baghouses are process equipment, the production system could not function without the baghouses in place.

Several of the baghouses are used as emissions control equipment on other process equipment. In these cases, the emitting units use the control equipment to meet applicable opacity and emissions limits. Uncontrolled emissions from the controlled sources have been calculated, and the calculations are attached. None of the sources other than the sander-dust boiler have uncontrolled emissions greater than the major source threshold.

The discussion below demonstrates that CAM is not applicable to any of the process equipment or control equipment listed in Table 5.1 of the permit. Calculations are attached showing the uncontrolled emissions for the sources that are equipped with control equipment. The emissions units are discussed in the order they are presented in Table 5.1 of the permit.

Baghouse BH-4, Outside Dry Silo Baghouse

Baghouse BH-4 is control equipment that controls emissions from the outside dry silo. The emissions source is the outside silo vent, and if B-4 was not in place silo vent emissions would be uncontrolled. Estimated uncontrolled emissions PM emissions from the silo vent are 28.6 tpy, and estimated uncontrolled PM_{10} emission rates are 16.4 tpy. Because the uncontrolled PM and PM_{10} emissions are less than 100 tpy, the silo vent baghouse, BH4, is not subject to the CAM rule.

Particulate Dryer and Cyclone with Multiclone

The multiclone on the particle dryer and cyclone is control equipment. The emissions source is the particle dryer and cyclone. If the multiclone were not in place, uncontrolled PM emissions from the cyclone would be 35.8 tpy and uncontrolled PM_{10} and would be 17.9 tpy. Because the uncontrolled emissions would be less than 100 tpy, the particle dryer and cyclone multiclone is not subject to the CAM rule.

Drag Chain Baghouse, BH-1

The Drag Chain Baghouse, BH-1, is part of the material handling system in the fuel barn and is process equipment. The emissions source is BH-1, and the facility does not rely on additional control equipment to meet emissions standards from this source. The CAM rule does not apply to BH-1.

Hammermill Cyclone Baghouse, BH-3A

The hammermill cyclone baghouse is part of the material handling and separation process for the hammermill. Wood material from the hammermill is first blown to the cyclone, where the larger pieces drop out of the air stream. The air stream then carries the smaller furnish pieces to the baghouse for collection. Baghouse BH-3A is an integral part of the wood transport and separation system, and the baghouse is therefore the emissions source. The facility does not rely on additional control equipment to meet emissions standards from this source. The CAM rule does not apply to BH-3A.

Scalper Air System Baghouse BH-5

The scalper air system baghouse, BH-5, is part of the scalper system and recycles material used in the forming process. BH-5 is process equipment and is not subject to the CAM rule. The baghouse listed as BH-5A is a duplicate of baghouse BH-4, as described above.

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

The east and west sawline baghouses are emissions control equipment used to control emissions from the pneumatic dust collection system on the sawline and associated processes. The east sawline baghouse is listed as BH-10A, but should be labeled BH-9.

If the pneumatic system and baghouses were not in use, sawdust would fall to the mill floor and fugitive dust would be emitted to the atmosphere. Emission factors are not readily available for this emissions source. Idaho DEQ issued emission factors for log sawing in the past, based on tons of logs cut. These emission factors have been adapted to estimate emissions from sawing particle board, based on the tons of board cut, as shown on the attached spreadsheet.

The emissions source is the sawline and associated activities. Estimated uncontrolled fugitive emissions from the sawline sources would be 24 tpy PM and 14 tpy PM_{10}. Because the uncontrolled emissions would be less than 100 tpy, the sawline and the associated baghouses are not subject to the CAM rule.

Reclaim Baghouse, BH-3

The reclaim baghouse, BH-3, recycles material in the forming process including trim mats and material that falls to the floor. The excess material is reclaimed pneumatically through the baghouse and reused in a continuous process. BH-3 is process equipment and is not subject to the CAM rule.

Sanderdust Storage Silo Baghouse, BH-6

The sanderdust silo baghouse, BH-6, is emissions control equipment used to control particulate emissions from the sanderdust silo. If BH-6 were not in place, emissions from the silo vent would be uncontrolled. Estimated uncontrolled emissions from the silo vent are 6 tpy PM and 3 tpy PM_{10}. Because the uncontrolled emissions are less than 100 tpy, BH-6 is not subject to the CAM rule.

Sander Air System Baghouse, BH-7

The sander air system baghouse, BH-7, is process equipment. This baghouse captures all the wood dust as it is sanded off the panels at the sander. The material in the baghouse is then dropped out thru a feeder into a high pressure blower line which sends it to the sanderdust silo. The sanderdust is stored in the silo to be feed into the sander-dust boiler for fuel. The sander air system baghouse is process equipment because it is required to operate the system that allows the use of sanderdust as fuel. Because the sander air system baghouse, BH-7, is process equipment, the CAM rule does not apply.

Sanderdust Overs Baghouse, BH-8

The sanderdust overs baghouse, BH-8, is process equipment that is used in the transport and separation of oversized pieces collected in the sifter screen. The baghouse is part of the material handling system and is not subject to the CAM rule.

PFP Particleboard Plant
Determination of CAM Applicability

Source		Outside Silo Vent		
Control Equipment		Baghouse BH-4, Outside Silo Baghouse		
Production Rate:		143,076	Tons Furnish/Yr, potential	
	PM: Emission Factor:	0.4	lb/ton	Idaho Factor as used in other permits
	Emissions:	28.62	tons/year	Uncontrolled Emissions
	PM10 : Emission Factor:	0.23	lb/ton	Idaho Factor as used in other permits
	Emissions:	16.45	tons/year	Uncontrolled Emissions
Source		Particle Dryer and Cyclone		
Control Equipment		Multiclone, CAM not required		
Production Rate:		143,076	Tons Furnish/Yr, potential	
	PM: Emission Factor:	0.5	lb/ton	Idaho Factor as used in other permits
	Emissions:	35.77	tons/year	Uncontrolled Emissions
	PM10 : Emission Factor:	0.25	lb/ton	Idaho Factor as used in other permits
	Emissions:	17.88	tons/year	Uncontrolled Emissions
Source		East and West Sawlines		
Control Equipment		BH-9, East Sawline Baghouse, and BH-10, West Sawline Baghouse		
Production Rate		96,000	msf/yr, 3/4", potential board production	
	Weight of Board:	2.8	lb/sf, based on 45 lb/cubic foot	
		134,400	tons particle board per year.	
	PM: Emission Factor:	0.35	lb/ton	Idaho log sawing factor from DEQ memo
	Emissions:	23.52	tons/year	Uncontrolled Emissions
	PM10 : Emission Factor:	0.2	lb/ton	Idaho Factor as used in other permits
	Emissions:	14.31	tons/year	Uncontrolled Emissions
Source		Sanderdust Storage Silo		
Control Equipment		Baghouse		
Production Rate		24,600	tons sanderdust/yr, maximum	
	PM: Emission Factor:	0.5	lb/BDT	Idaho Factor as used in other permits
	Emissions:	6.15	tons/year	Uncontrolled Emissions
	PM10 : Emission Factor:	0.25	lb/BDT	Idaho Factor as used in other permits
	Emissions:	3.08	tons/year	Uncontrolled Emissions

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	Plummer Forest Products, Inc.		
2. Facility Name	Plummer Forest Products	3. Facility ID No.	055-00018
4. Brief Project Description - One sentence or less	Particleboard production		

PERMIT APPLICATION TYPE

5. ☐ Initial Tier I ☐ Tier I Administrative Amendment ☐ Tier I Minor Modification ☐ Tier I Significant Modification
☒ Tier I Renewal: Permit No.: T1-2010.0040 Date Issued: Jan. 17, 2007

FORMS INCLUDED

Included	N/A	Forms		DEQ Verify
☒	☐	Form CSTI – Cover Sheet		☐
☒	☐	Form GI – Facility Information		☐
☐	☒	Form EU0 – Emissions Units General		☐
☐	☒	Form EU1– Industrial Engine Information	Please specify number of EU1s attached: _____	☐
☐	☒	Form EU2– Nonmetallic Mineral Processing Plants	Please specify number of EU2s attached: _____	☐
☐	☒	Form EU3– Spray Paint Booth Information	Please specify number of EU3s attached: _____	☐
☐	☒	Form EU4– Cooling Tower Information	Please specify number of EU4s attached: _____	☐
☐	☒	Form EU5 – Boiler Information	Please specify number of EU5s attached: 2	☐
☐	☒	Form CBP– Concrete Batch Plant	Please Specify number of CBPs attached: _____	☐
☐	☒	Form HMAP – Hot Mix Asphalt Plant	Please specify number of HMAPs attached:	☐
☐	☒	PERF – Portable Equipment Relocation Form		☐
☐	☒	Form BCE– Baghouses Control Equipment		☐
☐	☒	Form SCE– Scrubbers Control Equipment		☐
☐	☒	Form VSCE – Venturi Scrubber Control Equipment		☐
☐	☒	Form ESP – Electrostatic Precipitator		☐
☐	☒	Form AO – Afterburner/Oxidizer		☐
☐	☒	Form CYS – Cyclone Separator		☐
☐	☒	Form CA – Carbon Adsorber		☐
☐	☒	Forms EI-CP1 - EI-CP4– Emissions Inventory– criteria pollutants	(Excel workbook, all 4 worksheets)	☐
☒	☐	Form CAM – Compliance Assurance Monitoring		☐
☒	☐	Form FRA – Federal Regulation Applicability		☐

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For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

General Information **Form GI**
Revision 7
2/18/10

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

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION

1. Company Name	2. Facility Name:
Plummer Forest Products	Plummer Forest Products

3. Brief Project Description:	Tier I permit renewal

FACILITY INFORMATION

4. Primary Facility Permit Contact Person/Title	Jeff Carlson		Safety and Environmental Coordinator	
5. Telephone Number and Email Address	(208) 773-7521		j.carlson@nwpanel.com	
6. Alternate Facility Contact Person/Title	Todd Brinkmeyer		President	
7. Telephone Number and Email Address	(208) 773-7521		tbrinkmeyer@plummerforest.com	
8. Address to Which the Permit Should be Sent	401 N. Potlatch Road			
9. City/County/State/Zip Code	Post Falls	Kootenai	Idaho	83877
10. Equipment Location Address (if different than the mailing address above)	Same			
11. City/County/State/Zip Code				
12. Is the Equipment Portable?	☐ Yes ☒ No			
13. SIC Code(s) and NAICS Code	Primary SIC: 2493	Secondary SIC:	NAICS: 321219	
14. Brief Business Description and Principal Product	Particleboard production			
15. Indentify any adjacent or contiguous facility that this company owns and/or operates	None			
16. Specify the reason for the application	☐ Permit to Construct (PTC) 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. ☐ Incorporate the PTC at the time of the Tier I renewal ☐ Co-process the Tier I modification and PTC ☐ Administratively amend the Tier I permit to incorporate the PTC upon your request (IDAPA 58.01.01.209.05.a, b, or c) ☒ Tier I Permit ☐ Tier II Permit ☐ Tier II/Permit to Construct			

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.

17. Responsible Official's Name/Title	Todd Brinkmeyer	President	
18. Responsible Official's Signature		Date:	6-28-11

19. ☒ Check here to indicate that you would like to review the draft permit prior to final issuance.

DEQ AIR QUALITY PROGRAM
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For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Compliance Assurance Monitoring - **Form CAM**
Revision 2
08/28/08

Please see instructions on pages 3-8 before filling out the form.

IDENTIFICATION

1. Company Name:	**Plummer Forest Products, Inc.**	2. Facility Name:	Plummer Forest Products	3. Facility ID No.:	055-00018
4. Brief Project Description:	Tier I renewal application.				

MONITORING APPROACH SUBMITTAL

Background

5. Emissions Unit	Description (type of emission point): Sander-dust Boiler	Identification (emission point number): Emissions Unit Group 1= Sander-dust Boiler
6. Applicable Regulation, Emission Limits, and Monitoring Requirements	Applicable regulation citation: IDAPA 58.01.01.677 PTC No. P-2010.0042 40 CFR 64.6	Pollutant: PM, while burning wood Emission limit: 0.200 gr/dscf at 8% oxygen Pollutant: PM, while burning gas Emission limit: 0.015 gr/dscf at 3% oxygen Pollutant: Emission limit:
		Monitoring requirements: Pressure drop across the multiclone. Voltage and current applied by each transformer/rectifier (T/R) set.
7. Control Technology	Brief description: Multiclone followed by ESP with two fields.	

Table 1. Monitoring Approach

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator Description	Pressure drop across the multiclone.	Voltage applied by each T/R set to the discharge electrodes.	Current applied by each T/R set to the discharge electrodes.
Measurement Approach	Pressure differential gauge with operator readout.	Continuous voltage monitor with operator readout for each T/R set.	Continuous current monitor with operator readout for each T/R set.
II. Indicator Range (Quality improvement plan threshold optional)	0.5 to 6 inches water column (IWC)	15 to 65 kilovolts (kV)	90 to 330 milliamps (mA)
III. Performance Criteria	———	———	———
A. Data Representativeness	The pressure differential ports are located upstream and downstream of the cyclone array in the multiclone.	The voltage is measured using instrumentation provided with the ESP	The current is measured using instrumentation provided with the ESP
B. Verification of Operational Status	Pressure differential gauge properly installed as per manufacturer instructions.	Verify that voltage meter is properly calibrated following any repair or maintenance.	Verify that current (amp) meter is properly calibrated following any repair or maintenance.
C. QA/QC Practices and Criteria	Confirm the gauge zeros out when there is no flow through unit.	Confirm that meter reads zero when the ESP is not operating.	Confirm that meter reads zero when the ESP is not operating.
D. Monitoring Frequency	Recorded once per day.	Recorded hourly. Monitoring complete if 20 of 24 hours recorded.	Recorded hourly. Monitoring complete if 20 of 24 hours recorded.
Data Collection Procedures	Data recorded in log book, maintained for 5 years.	Data recorded on ESP Hourly Checklist forms. Maintained for 5 years.	Data recorded on ESP Hourly Checklist forms. Maintained for 5 years.

Averaging Period	Reading is instantaneous at time recorded.	Voltage reading is instantaneous at the time recorded.	Current reading is instantaneous at the time recorded.

Justification	Present justification for selection of monitoring approach(es) and indicator range(s): Justification for Indicator 1: Multiclone pressure drop below the range may indicate a leak allowing bypass of the cyclones. Pressure drop above the range may indicate blockage. Justification for Indicator 2: Voltage drop below the range could indicate a malfunction, such as grounded electrodes. Justification for Indicator 3: Current drop below the range could indicate collection plates not clean, or other malfunction.

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AIR PERMIT APPLICATION

Revision 6
10/7/09

For each box in the table below, CTRL+click on the blue underlined text for instructions and information.

IDENTIFICATION	
1. Company Name: Plummer Forest Products, Inc.	2. Facility Name: Plummer Forest Products
3. Brief Project Description:	Tier I Permit Renewal Application

APPLICABILITY DETERMINATION	
4. List applicable subparts of the New Source Performance Standards (NSPS) (40 CFR part 60). Examples of NSPS affected emissions units include internal combustion engines, boilers, turbines, etc. The applicant must thoroughly review the list of affected emissions units.	List of applicable subpart(s): **NSPS Subpart Dc will apply to Temporary Boiler if one is ever installed, as allowed in the permit.**
5. List applicable subpart(s) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR part 61 and 40 CFR part 63. Examples of affected emission units include solvent cleaning operations, industrial cooling towers, paint stripping and miscellaneous surface coating. EPA has a web page dedicated to NESHAP that should be useful to applicants.	List of applicable subpart(s): **NESHAP Subpart ZZZZ – Reciprocating Internal Combustion Engines. Applies to fire-water pump engine.**
6. For each subpart identified above, conduct a complete a regulatory analysis using the instructions and referencing the example provided on the following pages. **Note** - Regulatory reviews must be submitted with sufficient detail so that DEQ can verify applicability and document in legal terms why the regulation applies. Regulatory reviews that are submitted with insufficient detail will be determined incomplete.	☑ A detailed regulatory review is provided (Follow instructions and example). ☐ DEQ has already been provided a detailed regulatory review. Give a reference to the document including the date.

IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT

It is emphasized that it is the applicant's responsibility to satisfy all technical and regulatory requirements, and that DEQ will help the applicant understand what those requirements are prior to the application being submitted but that DEQ will not perform the required technical or regulatory analysis on the applicant's behalf.

NESHAPS REGULATORY ANALYSIS FOR PLUMMER FOREST PRODUCTS – POST FALLS NESHAPS Subpart ZZZZ

PART 63_NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE. Subpart ZZZZ_National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This is the CFR version of Subpart ZZZZ with the changes from the March 3, 2010 Final version included. Only applicable subparts have been printed.

Sec. 63.6585 Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions…

The PFP fire-water pump engine is a diesel-fired (compression ignition) RICE located at an area source of HAP emissions.

Sec. 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. (1) Existing stationary RICE. iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The PFP fire-water pump engine is an affected source, and was constructed before 2006. It is an existing emergency stationary RICE.

Sec. 63.6595 When do I have to comply with this subpart?

c) If you own or operate an affected source, you must meet the applicable notification requirements in Sec. 63.6645 and in 40 CFR part 63, subpart A.

According to 63.6645(5), notifications are not required for an existing stationary emergency CI RICE. PFP understands that notification is not required for the fire-water pump engine.

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

The PFP fire-water pump is smaller than 100 brake HP and is not subject to any requirements in Table 2b. The following are the applicable operating limitations in Table 2d:

Table 2d to Subpart ZZZZ of Part 63. Requirements for Existing Compression Ignition Stationary RICE Located at Area Sources of HAP Emissions

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
4. Emergency CI and black start CI.	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

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

PFP must comply with the operational requirements in Table 2d and listed above.

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

PFP must operate the fire-water engine as described above.

Sec. 63.6625 What are my monitoring, installation, operation, and maintenance requirements?

(e) If you own or operate an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions not subject to any numerical emission standards shown in Table 2d to this subpart, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

PFP must operate the fire-water engine as described above.

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

PFP must operate the fire-water engine as described above during startup.

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

Table 5 to Subpart ZZZZ does not contain emission or operating limitations that apply to the PFP fire-water pump engine.

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

PFP is not required to demonstrate continuous compliance for the fire-water pump engine because it is an emergency engine.

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

PFP must maintain records of operation to ensure compliance with the operational limitations listed in Table 2d for this emergency engine.

PFP must comply with the conditions of Section 63.6640(f) as listed below.

(f) If you own or operate … an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the engine according to the conditions described in paragraphs (f)(1) through (4) of this section.

(1) For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as permitted in this section, is prohibited.

PFP could operate the fire-water pump in non-emergency situations for up to 50 hours per year if needed.

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

Section 63.6645 What notifications must I submit and when?

The PFP fire-water Pump is an existing stationary emergency CI RICE, and therefore does not have to submit the notifications.

Sec. 63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you. *No reports in Table 7 apply.*

Sec. 63.6655 What records must I keep?

PFP must record hours of operation on a nonresettable hour meter and document the purpose of the operating hours.

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

PFP must keep records of engine operation for 5 years, as described below.

Sec. 63.6665 What parts of the General Provisions apply to me?

PFP does not need to comply with any requirements of the General Provisions for the fire-water pump engine.

Sec. 63.6675 What definitions apply to this subpart?

These are important definitions related to PFP's determination of applicability for Subpart ZZZZ.

Emergency stationary RICE means any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, *etc.* Stationary CI ICE used for peak shaving are not considered emergency stationary ICE.