

Statement of Basis

**Permit to Construct No. P-2008.0062
Project ID 61431**

**Stimson Lumber Company – Priest River
Priest River, Idaho**

Facility ID 017-00001

Final


**January 16, 2015
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Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal units
CAA	Clean Air Act
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MMBtu	million British thermal units
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>

FACILITY INFORMATION

Description

Stimson Lumber has not proposed to change the purpose and function of the existing facility. The facility process description is included below as it appears in the previous permit action.

Logs are brought from the log yard in to the sawmill and debarked. Residual materials is collected and used for hog fuel and bark product. The debarked logs continue into the sawmill and are cut. Again residual material is collected, generally as chips, which are sold. The sawn lumber proceeds to the kilns where it is dried, then to the planer for final processing to client specifications. Larger wood waste is used as hogged-fuel, chips are collected and sold and shavings are captured and sold.

Kilns operate using steam heat and the steam is provided by one of the two on-site hogged fuel boilers, the 24 MM Btu/hr output EPI fluidized-bed boiler and the 16,000 lbs steam per hour Wellons grate boiler. Both are fueled only from on-site hogged fuel.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

May 17, 1978	Permit in form of a letter for Hogged Fuel Boiler. Permit was revised May 29, 2001 solely to reflect a name change. (S)
October 8, 1998	PTC No. P-980094 modification of Kiln No. 1, for the establishment of production limits, and emission limits. Permit revised May 29, 2001 to reflect name change (S)
March 31, 2011	P-2008.0062 Initial "facility-wide" PTC (S)
January 3, 2013	P-2008.0062 Proj. 61134 DEQ initiated permit revision to limit steaming rate and remove obsolete permit conditions. (S)

Application Scope

This application is solely a request for the addition of the requirements of 40 CFR 63 Subpart JJJJJ as required by Permit Condition 27 included in permit number P-2008.0062 issued January 3, 2013.

However, as described in the Permit Conditions Review section of this Statement of basis the permit, DEQ has also clarified the existing source testing requirements for the wood fired boilers, and clarified the existing particulate matter standard (grain loading) that applies to the wood fired boilers.

Application Chronology

September 24, 2014	DEQ received an application and an application fee.
October 24, 2014	DEQ determined that the application was complete.
November 17, 2014	DEQ made available the draft permit and statement of basis for peer and regional office review.
November 21, 2014	DEQ made available the draft permit and statement of basis for applicant review.
January 9, 2015	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

The facility has not proposed a modification to the facility and none of pervious technical analysis is changing. See the March 23, 2011 Statement of Basis for Project No. 0062 for the equipment listing and emission inventory.

REGULATORY ANALYSIS

The only regulatory analysis that is new to this permitting action is the one associated with the addition of the requirements of 40 CFR 63 Subpart JJJJJ. The applicability of that regulation is provided in this statement of basis, all other regulatory analysis remain unchanged and may be seen in the March 23, 2011 Statement of Basis for Project No. 0062.

Existing source testing requirements for the wood fired have been clarified as described in the Permit Conditions Review section of the Statement of Basis.

NESHAP Applicability (40 CFR 63)

Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

A detailed regulatory review is provided below. All applicable provisions are underlined.

§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.

Stimson Lumber owns and operates two industrial biomass boilers and is an area source of HAPs is therefore an affected facility.

§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.

Stimson Lumber has two existing biomass boilers (EPI and Wellons Boilers) at an area source, they are affected sources.

(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.

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

Stimson Lumber's EPI Boiler was constructed in 1974 and the Wellons Boiler was constructed in 1978 – both are then existing affected boilers.

(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.

(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.

(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.

Stimson Lumber is permitted to combust biomass exclusively.

(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.

Stimson Lumber will not be required to obtain a Title V permit.

§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.

Stimson Lumber is not excluded from applicability by any of the paragraphs (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.

The boilers are subject to tune-up requirements. Stimson Lumber certified in the application that the EPI Boiler was tuned-up on February 27, 2014 and the Wellons Boiler was tuned-up on March 3-4, 2014.

(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.

The boilers are existing biomass boilers and are not subject to emissions limit in Table 1 of this subpart.

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

In accordance with Table 2 to this subpart a one-time energy assessment is required. Stimson Lumber certified in the application materials that an energy assessment was conducted on the EPI Boiler on February 27, 2014 and the Wellons had an energy assessment on March 3-4, 2014.

(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.

(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.

(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.

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.

Stimson Lumber's boilers are biomass boilers.

§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.

Stimson Lumber does not operate any boilers listed in Table 1 and emission limits are not applicable.

(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.

The applicable provisions of Table 2 are underlined in the following table.

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 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.
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. <u>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</u>	<u>Conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223.</u>

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-to-fuel ratio that would otherwise be subject to a biennial tune-up	Conduct a tune-up of the boiler every 5 years as specified in §63.11223.
16. <u>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</u>	<u>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:</u>
	<u>(1) A visual inspection of the boiler system,</u>
	<u>(2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,</u>
	<u>(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,</u>
	<u>(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,</u>
	<u>(5) A list of major energy conservation measures that are within the facility's control,</u>
	<u>(6) A list of the energy savings potential of the energy conservation measures identified, and</u>
	<u>(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific</u>

	improvements, benefits, and the time frame for recouping those investments.
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(c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.

(d) These standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

The only standards of this subpart that apply to Stimson Lumber's boilers are those in Table 2. Therefore the startup/shutdown exclusion does not apply, and the source must always comply with the application provisions of Table 2 to this subpart (work practice standards).

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.

(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.

This paragraph does not apply to Stimson Lumber because the boilers do not have Table 1 emission limits.

(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).

This paragraph does not apply to Stimson Lumber because the boilers do not have Table 1 emission limits.

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.

Stimson Lumber is not subject to Table 1 emissions limits; therefore this paragraph does not apply.

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

Stimson Lumber is not subject to Table 1 emissions limits; therefore this paragraph does not apply.

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

(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.

The boilers are subject to tune-up requirements. Stimson Lumber certified in the application that the EPI Boiler was tuned-up on February 27, 2014 and the Wellons Boiler was tuned-up on March 3-4, 2014.

In accordance with Table 2 to this subpart a one-time energy assessment is required. Stimson Lumber certified in the application materials that an energy assessment was conducted on the EPI Bon February 27, 21014 and the Wellons had an energy assessment on March 3-4, 2014.

The date of compliance specified in §63.11196 is 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).

Stimson Lumber is not subject to Table 1 emissions limits; therefore this paragraph does not apply.

(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.

This paragraph does not apply because Stimson Lumber does not combust oil in the 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.

This paragraph does not apply because Stimson Lumber's boilers are neither new nor reconstructed.

(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.

This paragraph does not apply because Stimson Lumber does not burn solid waste.

(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 JJJJJ or the boiler becoming subject to subpart JJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g).

This general requirement applies to Stimson Lumber and is included in the permit.

(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.

This paragraph does not apply to Stimson Lumber because it is not a major source of HAP emissions.

(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.

This paragraph does not apply to Stimson Lumber because it has not been in a non-operating status.

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

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

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

The previous 3 subsections do not apply because Stimson Lumber is not subject to emissions limits in Table 1 to this subpart.

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

(a) If you own or operate an existing or new coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must conduct a performance tune-up according to §63.11223(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.

This paragraph does not apply because Stimson Lumber does not combust coal.

(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.

The boilers are subject to tune-up requirements. Stimson Lumber certified in the application that the EPI Boiler was tuned-up on February 27, 2014 and the Wellons Boiler was tuned-up on March 3-4, 2014.

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

(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.

This paragraph does not apply because Stimson Lumber is not subject to any emission limits in Table 1 of this subpart.

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

This entire subsection does not apply because Stimson Lumber is not subject to emission limits in Table 1 of this subpart.

§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).

This paragraph, as well the following paragraphs (b), (c) and (d), do not apply to Stimson Lumber because the site-specific monitoring plan is not required by §63.11205(c).

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

This entire subsection does not apply to Stimson Lumber because they are not subject to any emission limits in Table 1 of this subpart or operating limit in Table 3 of this subpart.

§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.

Stimson Lumber is subject to this paragraph. It is included in the permit.

(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.

Stimson Lumber is not subject to the exceptions provided in paragraphs (b)(1) through (7) because the boilers are not equipped with an oxygen trim system, are not seasonal boilers, are not oil-fired boilers, and are not limited-use boilers.

Paragraphs (1)-(7) listed below are applicable and are included in the permit.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

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

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

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

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

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

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

(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

(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.

Stimson Lumber does not have an oxygen trim system and this paragraph does not apply.

(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.

Stimson Lumber does not operate seasonal boilers and this paragraph does not apply.

(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.

Stimson Lumber does not operate oil fired boilers and this paragraph does not apply.

(f) Limited-use boilers must conduct a tune-up every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed limited-use boiler, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months. Limited-use boilers are not subject to the emission limits in Table 1 to this subpart, the energy assessment requirements in Table 2 to this subpart, or the operating limits in Table 3 to this subpart.

Stimson Lumber does not operate oil fired boilers and this paragraph does not apply.

(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.

Stimson Lumber does not operate a boiler subject to limits in Table 1 of this subpart therefore this paragraph does not apply.

§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.

Stimson Lumber does not operate a boiler subject to the limit in Table 1 of this subpart therefore this paragraph does not apply.

(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).

Stimson Lumber does not operate a boiler subject to limits in Table 1 of this subpart therefore this paragraph does not apply.

(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).

Stimson Lumber does not operate a boiler subject to limits in Table 1 of this subpart therefore this paragraph does not apply.

(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.

Stimson Lumber does not have an operating limit that requires the use of a CMS therefore this paragraph does not apply.

(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.

Stimson Lumber does not have an opacity limit under this regulation therefore this paragraph does not apply.

(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.

Stimson Lumber does not use a fabric filter bag leak detection system.

§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.

§§63.7(b) notification requirements pertain to performance testing requirements which do not apply to Stimson Lumber.

§§63.8(e) and (f) notification requirements pertain to performance evaluations for CMS and alternative monitoring methods that do not apply to Stimson because CMS is not required.

§§63.9 are notification requirements that are included in the permit.

(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.

Stimson Lumber has certified in the application that initial notification was provided to EPA no later than January 20, 2014 and the following information was provided:

The name and address of the owner or operator ; the address (i.e. physical location) of the affected source; an identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; a brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and a statement of whether the affected source is a major source or an area source.

(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.

Stimson Lumber is not required to conduct a stack test because it is not subject to emission limits in Table 1 to this subpart.

(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.

Stimson is required to submit the Notification of Compliance Status no later than 120 days after the application compliance date specified in §63.11196; performance testing is not required and the remainder of the paragraph does not apply. The compliance date in accordance with §63.11196 is March 21, 2014. Stimson has not indicated whether the Notification of Compliance Status was sent to EPA or not.

(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."

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

(iv) For units that install bag leak detection systems: "This facility complies with the requirements 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.

(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.

Stimson Lumber is not using data from a previously conducted test therefore this paragraph does not apply.

(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."

§§63.11214(d) does not apply because Stimson Lumber is not subject to any emission limits in Table 1 of this subpart. 63.11223(g) does not apply to Stimson Lumber because it does not operate a boiler subject to the limit in Table 1 of this subpart therefore this paragraph does not apply.

(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.

Stimson Lumber is not subject to an emission limit in this subpart.

(c) You must maintain the records specified in paragraphs (c)(1) through (7) of this section.

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

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 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.

(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).

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(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.

(v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.

(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.

(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.

Stimson Lumber does not demonstrate compliance through fuel analysis and this paragraph does not apply.

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

This paragraph is included in the permit.

(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.

This paragraph is included in the permit.

(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.

§§63.11221 does not apply to Stimson Lumber because the site-specific monitoring plan is not required by §63.11205(e).

§63.11222 does not apply to Stimson Lumber because they are not subject to any emission limits in Table 1 of this subpart or operating limit in Table 3 of this subpart.

(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.

Stimson Lumber 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.

This paragraph applies and is included in the permit.

(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>). 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.

This paragraph does not apply because Stimson Lumber is not required to conduct a performance 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.

This paragraph does not apply because Stimson Lumber is not required to use a CEMS.

(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:

This paragraph applies and is included in the permit.

- (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.

(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 JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJ, 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:

This paragraph applies and is included in the permit.

- (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.

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

These are generally applicable provisions and are not included in the permit.

§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.

The applicable General Provisions of Table 8 are included in the permit. Provisions pertaining to source testing, and CMS are not applicable and are not included in the permit.

§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.

This subpart is implemented by EPA, however DEQ includes these provisions in the permit as reasonable permit conditions in accordance with IDAPA 58.01.01.211.

This subpart is implemented by EPA, however DEQ includes these provisions in the permit as reasonable permit conditions in accordance with IDAPA 58.01.01.211.

Paragraphs (b) and (c) do not apply because this subpart is not delegated to the State of Idaho.

Tables 1, and 3 through 7 do not apply to Stimson Lumber because they do not have any applicable emission limits from this subpart.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. All permit conditions have been renumbered to reflect DEQ's current permit numbering scheme.

Permit Condition 1.1

The purpose of this permitting action is described. The permittee has requested to include the provisions of 40 CFR 63 Subpart JJJJJ to the permit as required by the previous permit. DEQ has also clarified the emission standards and performance testing requirements for the wood fired boilers.

Permit Condition 3.5

This permit condition was formerly Permit Condition 13. This permit condition is simply reciting the applicable particulate matter standard of IDAPA 58.01.01.677, however in reciting the standard a decimal place was omitted. The previous permit referred to the particulate standard as 0.20 grains per dry standard cubic foot and the actual standard is 0.200 grains per dry standard cubic foot. The permit has been updated to accurately include the actual applicable standard.

Permit Conditions 3.13, 3.14, 3.21-3.26, 3.31 and 3.34 include the applicable provisions of 40 CFR 63 Subpart JJJJJ. A detailed review of the regulation applicability is provided in the Regulatory Analysis section of this Statement of Basis. These are new permit conditions.

Permit Condition 3.27

This permit condition was formerly Permit Condition 28. The existing permit condition contained an obsolete date by which a source test must be conducted (by December 31, 2013) and that date has been removed from the permit. In addition the permit condition has been rewritten to more accurately describe the required source testing frequency (which is dependent on the results of the most recent test conducted on the boilers) and to clarify that particulate matter emission in grains per dry standard cubic feet shall be corrected for oxygen and altitude as specified by IDAPA 58.01.01.675 and that visible emissions shall be determined using the methods and procedures contained in IDAPA 58.01.01.625 regardless of which pollutant established the testing frequency.

Reviewing the current source test dates stipulated in the permit and in letters DEQ has issued to Stimson the following testing schedules are currently in place.

PPC ESP stack from the EPI Boiler – Conduct tests by May 31, 2017 for particulate matter (grain loading), PM₁₀, and visible emissions, as specified in the current permit.

Wellons Boiler Stack – Conduct tests by Calendar year 2017 for particulate matter (grain loading) and by November 19, 2018 for PM₁₀ as specified in DEQ’s February 20, 2014 letter¹ to Marty Kyler of Stimson Lumber.

After considering these facts, and input from the Coeur d Alene Regional office, in order to clarify, simplify and continue the intent² of the original testing requirements, future testing required by this permitting action is required by May 31, 2017 on both boilers for all pollutants (PM, PM₁₀ and visible emissions). Subsequent testing is required depending on the results of the most recent performance test results for PM and PM₁₀. Visible emissions shall also be determined during each performance test.

Permit Condition 3.30

The previous permit condition required source test reports to be submitted within 30 days, which has been changed to 60 days.

Permit Condition 3.32

This permit condition specifies where reports required by 40 CFR 63, Subpart JJJJJ shall be submitted. The reports are required to be submitted to EPA and DEQ. DEQ is not delegated the regulation and reports must be submitted to EPA. As a reasonable permit condition, DEQ requires the reports to be submitted to the DEQ Coeur d’ Alene regional office as well.

Permit Condition 3.33

This permit condition includes DEQ standard language for incorporating federal requirements. In short, should there be a conflict between those permit conditions that reference 40 CFR 63 Subpart JJJJJ requirements and the actual 40 CFR 63 Subpart JJJJJ requirements, then the CFR shall govern.

General Provision 6.8

This provision was previously Permit Condition 57. The previous permit required a report to be submitted within 30 days of the source test. The revised permit condition requires the report to be submitted within 60 days.

All other permit conditions remain unchanged except that they have renumbered.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04.

1 DEQ Electronic Record Retention Number 2014AAI442 (i.e. TRIM record number)

2 DEQ’s compliance group has interpreted the existing permit has ongoing testing requirements. Testing does not end, it continues on based on the testing frequency included in the permit. There may be a different schedule for PM than there is for PM₁₀. This is the intent of the original permit.

APPENDIX A – PROCESSING FEE

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Stimson Lumber Company - Priest
Address: 12 Old Priest River Road
City: Priest River
State: Idaho
Zip Code: 83856
Facility Contact: Steven Petrin
Title: Facility Permitting Contact
AIRS No.: 017-00001

- N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- N Did this permit require engineering analysis? Y/N
- N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 250.00		

Comments: No increase in emissions only added 40 CFR Subpart JJJJJJ requirements.