

Statement of Basis

**Permit to Construct P-2007.0107
Project No. 60629**

**Bennett Lumber Products, Inc.
Princeton, Idaho**

Facility ID No. 057-00008

Final

 **January 13, 2010
Eric Clark
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

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Bhp	brake horsepower
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
gph	gallons per hour
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per year
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBF	million board feet
MMBF/yr	million board feet per year
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants

NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
RICE	reciprocating internal combustion engine
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

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

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

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

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).

June 1, 1977	A letter serving as a PTC was issued based on a March 5, 1977 application for construction of a Zurn Industries Hog-Fuel Boiler, a Type C three-drum water tube type boiler rated at 90 million Btu per hour (MMBtu/hr), with a normal capacity of 60,000 pounds of saturated steam per hour burning bark with 50% moisture. (S)
January 25, 1995	DEQ received an application for an initial Tier I operating permit, which included sawmill equipment that had been installed during the 1980s without first obtaining a PTC.
May 29, 1996	DEQ received a facility-wide PTC application from BLP, which included equipment that had been installed during the 1980s without first obtaining a PTC. No action was taken on this application.
September 20, 2000	A DEQ inspection found that BLP was out of compliance with Idaho Air Rules, having failed to obtain a PTC for initial construction and all subsequent modifications for emissions units other than the Zurn hog-fuel boiler. DEQ determined that PTC compliance issues would be addressed through a compliance plan included as part of the facility's initial Tier I Operating Permit.
May 15, 2001	Initial Tier I Operating Permit No. T1-057-00008 was issued based on a January 25, 1995 application and supplemental application materials received on April 19, 1995; November 1995; December 14, 1995; and December 4, 1998. This permit analysis was based on annual lumber production of 102 MMBF (lumber scale) and 60 MMBF (log scale). This Tier I permit included a compliance schedule requiring BLP to apply for a T2/PTC to bring BLP into compliance with applicable PTC requirements. (S)
January 13, 2005	Tier II/PTC Permit No. T2-010208 was issued based on a June 30, 2001 application and supplemental information (updated emission inventories and/or revised dispersion modeling) received on October 17, 2003;

November 21, 2003; December 5, 2003; May 6, 2004; and May 19, 2004. This compliance T2/PTC was required to address the construction and/or modification of the following equipment without first obtaining a PTC:

- Log debarking system and log sawing system;
- New planer mill;
- Hog fuel/truck bin, truck shavings bin, truck sawdust bin, and truck chip bin;
- Boiler fuel storage building;
- Drying Kilns:
 - Kiln #1, Lumber Systems, 73 foot double track drying kiln;
 - Kiln #2, Wellons, 73 foot double track drying kiln;
 - Kiln #3, Lumber Systems, 73 foot single track drying kiln;
 - Kiln #4, Lumber Systems, 73 foot double track drying kiln;
 - Kiln #5, Lumber Systems, 73 foot double track drying kiln;
 - Kiln #6, Lumber Systems, 73 foot double track drying kiln;and
- Seven cyclones and one baghouse.

This permit limited annual lumber production to 97.2 MMBF (presumed to be log scale), and limited the hog-fuel boiler PM₁₀ emissions to 13.7 lb/hr, based on a July 31, 2001 source test. (S)

January 14, 2005

Tier I Operating Permit No. T1-020203 was issued based on a June 10, 2002 application for a significant modification (to incorporate the required Tier II permit required by the T1-057-00008 compliance plan) and supplemental information (updated emission inventories and/or revised dispersion modeling) received on October 17, 2003; November 21, 2003; December 5, 2003; May 6, 2004; and May 19, 2004. This permit limited maximum annual kiln throughput to 97.2 MMBF. (A)

February 22, 2005

DEQ received a Tier I Operating Permit renewal application, which included a CAM plan for the Zurn hog-fuel boiler. The analysis was based on maximum annual kiln throughput of 97.2 MMBF.

October 6, 2005

PTC No. P-050206 was issued based on a June 3, 2005, 15-day pre-permit construction authorization application and supplemental application materials (revised emission inventories and dispersion modeling) received on June 29, 2005 and September 17, 2005. The PTC was for construction of new Kiln #7, a Wellons 73-foot double track drying kiln. The permitted maximum annual kiln throughput remained at 97.2 MMBF (lumber scale). (S)

October 7, 2009

Fulfill the requirements of the Consent Order, issued on April 13, 2007, for enforcement Case No. E-060014, to increase the permitted emissions of PM₁₀ from 13.7 pounds per hour (lb/hr) to 27 lb/hr;

Drying Kilns.

Increase the total maximum lumber throughput for the drying kilns (Kilns 1 through 7) by 62.1%, or 60.385 million board feet per year (MMBF/yr), from 97.2 MMBF/yr to 157.585 MMBF/yr (lumber scale);

Revise the manufacturer for Kiln #7 from Wellons to Moore. (Comments on draft permit wanted it changed from Moore to Wellons, so that is how the SOB reads now)

Zurn Hog-Fuel Boiler.

Increase the total hog-fuel input by 33.1% or 15,850 green tons per year (GT/yr), from 47,837 GT/yr to 63,687 GT/yr.

Increase the total steam production by 43.5%, from 283.78 million pounds of steam per year (MMlbSteam/yr) to 407.34 MMlbSteam/yr, based on producing an average of 46,500 pounds of steam per hour for 8,760 hours per year. This is equivalent to increasing the total heat input by 193,641 million Btu per year (MMBtu/yr), from 444,728 MMBtu/yr to 638,369 MMBtu/yr.

Include permit conditions that limit annual hazardous air pollutant (HAP) emissions to avoid triggering maximum achievable control technology (MACT) requirements (S).

August 2, 2010

The permittee has requested to revise PTC No. P-2007.0107, to correct a typographical error regarding emissions testing. Specifically, the performance test permit condition required that the exhaust gas flowrate and exhaust gas moisture content data were to be collected each 15 minutes during a source test. This permit condition was removed as these data are being collected in accordance with the test methods employed. Therefore, maintaining this portion of permit condition 3.8.1 would only create unintended redundancy.

January 17, 2011

The permittee has requested some verbiage throughout the permit be consistent with language used in the associated Tier I CAM plan. Also, the emergency fire pump requirements as defined in NESHAP, Subpart ZZZZ were included.

Application Scope

This PTC is for a permit revision based on the information directly above.

The applicant has proposed to:

- Correct typographical errors to correlate more accurately with Tier I language and operations at the facility.
- New applicable NESHAP, Subpart ZZZZ requirements were added into the permit.

Application Chronology

November 17, 2010	DEQ received an application (No fees were necessary).
November 24, 2010	DEQ determined that the application was complete.
December 3, 2010	DEQ made available the draft permit and statement of basis for applicant review.
January 17, 2011	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. For details regarding the emissions units, process descriptions, and the emissions inventory for this facility, refer to the Statement of Basis for PTC No. P-2007.0107, issued on October 7, 2009. This information was not changed as a result of this project.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

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

The “Plywood” MACT, 40 CFR 63.2230 *et seq.*, applies to lumber kilns located at any facility that is a major source of HAP emissions. A facility-wide permit condition limits BLP’s HAP emissions below major source levels. Therefore, this subpart does not apply.

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

The “Boiler” MACT, 40 CFR 63.7485 specifies that the facility is subject to this subpart if the facility owns an industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of HAP. A facility-wide permit condition limits BLP’s HAP emissions below major source levels. Therefore, this subpart does not apply. Note that on June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit issued a decision vacating this MACT in its entirety and remanding this rule back to EPA. As a result, this MACT rule is no longer in force.

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

§ 63.6585 *Am I subject to this subpart?*

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

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

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

Bennett Lumber does operate a John Deere, model 6081AF001, 270 bhp emergency fire pump periodically throughout the year and it is used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source thresholds of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined. This is assured by Permit Condition 2.1 within the associated permit.

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

This subpart applies to each affected source.

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

(1) Existing stationary RICE.

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

The engine located at Bennett Lumber is considered existing as it was constructed in 1999.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Bennett operates an emergency engine; therefore this section does not apply to the facility.

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

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

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

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

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

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

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

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

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

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

§ 63.6615 *When must I conduct subsequent performance tests?*

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

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

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

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

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

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

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

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

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

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

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

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

This section allows Bennett to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection i of the subpart.

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

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

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

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

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

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

Section 9 of Table 6 of the subpart pertains to the emergency IC engine at Bennett. Requirement work practices are accounted for within Permit Condition 6.5 of the associated permit.

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

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

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

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

The above requirements pertain specifically to emergency engines. Permit Condition 6.9 accounts for these.

§ 63.6645 *What notifications must I submit and when?*

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

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

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

§ 63.6650 *What reports must I submit and when?*

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

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

§ 63.6655 *What records must I keep?*

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

(2) An existing stationary emergency RICE.

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

demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

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

Bennett needs to maintain records demonstrating that the engine is being operated in accordance an appropriate maintenance plan. Records of operational hours from the non-resettable meter must also be kept. How many hours were spent in emergency situations and demand response. This requirements is established in condition 6.10.

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

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

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

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

Permit Condition 6.10 also accounts for these requirements.

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.

Existing Permit Condition 1.4

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Wood handling, conveying, screening, and storage	None
2	Fire Pump Engine (emergency generator)	None
3	Hog-Fuel Boiler	Multiclone and Wet (Venturi) Scrubber
4	Lumber Dry Kilns	None
5	Sawmill and planers	Baghouses and cyclones

Revised Permit Condition 1.4

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.2 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Wood handling, conveying, screening, and storage	None
3	Hog-Fuel Boiler	Multiclone and Wet Scrubber
4	Lumber Dry Kilns	None
5	Sawmill and planers	Baghouses and cyclones
6	Fire Pump Engine (emergency generator)	None

This permit condition has been revised to remove the reference to the scrubber as a venturi. Also, the emergency engine was moved to a new section 6 of the permit to incorporate MACT, Subpart ZZZZ requirements. The permittee had requested that the engine be removed from the table as it is categorized as a “Insignificant Activity” in the associated Tier I permit. However, once it was determined that the engine was subject to the subpart it could not longer be considered insignificant. This is in accordance with IDAPA 58.01.01.317.01. No emission unit or activity subject to an applicable requirement shall qualify as an insignificant activity.

New Permit Condition 2.2

MACT 40 CFR 63, Subpart A – General Provisions for Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

The permittee must comply with the requirements in General Provisions of 40 CFR 63, Subpart A.

Generally applicable reporting, recordkeeping and notification requirements of Subpart A of the MACT, 40 CFR 63 are included in Table 11. These summaries are provided to highlight the notification and recordkeeping requirements of 40 CFR 63 for affected facilities, and are not intended to be a comprehensive listing of all general provision requirements that may apply nor do the summaries relieve the permittee from the responsibility to comply with all applicable requirements of the CFR. Should there be a conflict between these summaries and the MACT, the MACT shall govern. The permittee is encouraged to read all of 40 CFR 63 Subpart A.

Table 2.1 Subpart A to 40 CFR Part 63 Subpart ZZZZ – Summary of Applicable Requirements of MACT 40 CFR 63 Subpart A- General Provisions

<i>Citation</i>	<i>Subject</i>	<i>Explanation</i>
<i>40 CFR 63.1(a)(1)-(12)</i>	<i>General Applicability</i>	
<i>40 CFR 63.1(b)(1)-(3)</i>	<i>Initial Applicability Determination</i>	<i>Applicability of subpart ZZZZ is also specified in 40 CFR 63.6585</i>
<i>40 CFR 63.11(1)</i>	<i>Applicability After Standard Established</i>	
<i>40 CFR 63.11(2)</i>	<i>Applicability of Permit Program for Area Sources</i>	
<i>40 CFR 63.11(5)</i>	<i>Notifications</i>	
<i>40 CFR 63.2</i>	<i>Definitions</i>	<i>Additional definitions are specified in 40 CFR 63.6675.</i>
<i>40 CFR 63.3(a)-(c)</i>	<i>Units and Abbreviations</i>	
<i>40 CFR 63.4(a)(1)-(5)</i>	<i>Prohibited Activities</i>	
<i>40 CFR 63.4(b)-(c)</i>	<i>Circumvention/Fragmentation</i>	
<i>40 CFR 63.6(a)</i>	<i>Compliance With Standards and Maintenance Requirements—Applicability</i>	
<i>40 CFR 63.6(b)(1)-(7)</i>	<i>Compliance Dates for New and Reconstructed Sources</i>	<i>40 CFR 63.6595 specifies the compliance dates.</i>
<i>40 CFR 63.61(1)-(5)</i>	<i>Compliance Dates for Existing Sources</i>	<i>40 CFR 63.6595 specifies the compliance dates.</i>
<i>40 CFR 63.6(f)(2)-(3)</i>	<i>Methods for Determining Compliance</i>	
<i>40 CFR 63.6(g)(1)-(3)</i>	<i>Use of an Alternative Standard</i>	
<i>40 CFR 63.6(i)(1)-(16)</i>	<i>Extension of Compliance</i>	
<i>40 CFR 63.6(j)</i>	<i>Presidential Compliance Exemption</i>	
<i>40 CFR 63.8</i>	<i>Monitoring Requirements</i>	<i>40 CFR 63.6625 specifies appropriate monitoring requirements</i>
<i>40 CFR 63.9(a)-(e), (g)-(j)</i>	<i>Notification Requirements</i>	<i>40 CFR 63.645 specifies notification requirements.</i>
<i>40 CFR 63.10(a)</i>	<i>Recordkeeping/Reporting—Applicability and General Information</i>	
<i>40 CFR 63.10(b)(1)</i>	<i>General Recordkeeping Requirements</i>	<i>Additional requirements are specified in 40 CFR 63.6655</i>
<i>40 CFR 63.10(b)(2)(xii)</i>	<i>Waiver of recordkeeping requirements</i>	
<i>40 CFR 63.10(b)(2)(xiv)</i>	<i>Records supporting notifications</i>	
<i>40 CFR 63.10(b)(3)</i>	<i>Recordkeeping Requirements for Applicability Determinations</i>	
<i>40 CFR 63.10(d)(1)</i>	<i>General Reporting Requirements</i>	<i>Additional requirements are specified in 40 CFR 63.6650</i>
<i>40 CFR 63.10(d)(4)</i>	<i>Progress Reports for Sources With Compliance Extensions</i>	
<i>40 CFR 63.10(f)</i>	<i>Recordkeeping/Reporting Waiver</i>	
<i>40 CFR 63.12</i>	<i>State Authority and Delegations</i>	
<i>40 CFR 63.13</i>	<i>Addresses of State Air Pollution Control Agencies and EPA Regional Offices</i>	
<i>40 CFR 63.14</i>	<i>Incorporation by Reference</i>	
<i>40 CFR 63.15</i>	<i>Availability of Information/Confidentiality</i>	

This condition was added to incorporate the MACT General Provisions associated with subpart ZZZZ. Some of these may not apply to Bennett. The purpose of the table is making it all-inclusive and to have the permittee aware that these general provisions exist.

Existing Permit Condition 3.1

Table 3.3 ZURN HOG-FUEL BOILER DESCRIPTION

<i>Emissions Unit(s) / Process(es)</i>	<i>Emissions Control Device</i>
<i>Hog-Fuel Boiler</i>	<i>Multiclone in series with a Wet (Venturi) Scrubber</i>

Revised Permit Condition 3.1

Table 3.4 ZURN HOG-FUEL BOILER DESCRIPTION

<i>Emissions Unit(s) / Process(es)</i>	<i>Emissions Control Device</i>
<i>Hog-Fuel Boiler</i>	<i>Multiclone in series with a Wet Scrubber</i>

Venturi was removed from the description of the scrubber at the permittee's request.

Existing Permit Condition 3.6.3

The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the pressure drop across the hog fuel boiler multiclone and across the wet scrubber during operation of the hog fuel boiler.

Revised Permit Condition 3.6.3

The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the ID fan outlet (scrubber inlet) pressure and the pressure drop across the hog fuel boiler multiclone during operation of the hog fuel boiler.

Verbiage of how measurements of the pressure were updated to reflect language in the CAM plan in the Tier I and to be more consistent with onsite measurement locations.

The following permit conditions were removed from the permit because they were made obsolete when the CAM plan in the Tier I Operating Permit was added. All of these conditions were O&M manual monitoring and recordkeeping requirements. They have been removed from the PTC and Tier I operating permit to avoid redundancy with the CAM requirements.

Removed Permit Condition 3.7.1

The permittee shall maintain and follow O&M manual(s) for the multiclone and for the wet scrubber which describes the procedures that will be followed to comply with General Provision 2 of this permit and the manufacturer specifications for these air pollution control devices. At a minimum, the following items shall be included in the manual(s):

- *A general description of the control device;*
- *Manufacturer's recommended values or values recommended in writing by combustion consultant and values from the most recent DEQ-approved CAM plan for each of the following parameters:*
 - *Pressure drop range across the multiclone in inches of water;*
 - *Pressure at the ID fan outlet (scrubber inlet) in inches of water, and*
 - *Minimum scrubbing media flow rate in gallons per minute,*
- *Normal operating procedures;*
- *Methods of identifying and preventing malfunctions;*
- *Appropriate corrective actions to be taken in the case of upsets and malfunctions;*

- *Provisions for at least weekly inspections and routine maintenance schedules, including inspection frequency and evaluation criteria for the quality and flow rate for the wet scrubber scrubbing media; and*
- *Relevant information about efficient concurrent operation of the multiclone unit and the wet scrubber:*

Removed Permit Condition 3.7.2

In accordance with 40 CFR 64.3(b)(2), the owner or operator shall consider the monitoring equipment manufacturer's requirements or recommendations for installation, calibration, and start-up operation.

Removed Permit Condition 3.7.3

A copy of the manufacturer's or combustion consultant's recommendations shall be included with the O&M manual and both shall be made available to DEQ representatives upon request.

Removed Permit Condition 3.7.4 (Portion)

Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall update the O&M manual to specify the appropriate range(s) or designated condition(s) for the multiclone and the scrubber and the scrubbing media flow rate established by the performance test, and may then operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

Removed Permit Condition 3.7.5

The O&M manual(s) shall be updated within 30 days of receipt by the facility of the most recent compliance testing report, and shall contain a certification by a responsible official. The O&M manual(s) shall be updated as needed as additional information is gained in day-to-day operating experience.

Removed Permit Condition 3.7.6

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

Removed Permit Condition 3.12

The permittee shall monitor and record the scrubber flow rate once daily.

Existing Permit Condition 3.8.1

The permittee shall conduct a performance test on the Zurn hog-fuel boiler to demonstrate compliance with the opacity limit, the PM₁₀ lb/hr emissions limit, and the grain loading standard, and to determine the CO one-hour average emission rate. The initial CO test shall be performed on or before June 29, 2011

The following information, at a minimum, shall be recorded during each performance test run and included in the performance test report:

- *The pressure drop across the multiclone and wet scrubber shall be recorded in inches of water at least once each 15 minutes during each test run;*

Revised Permit Condition 3.8.1

The permittee shall conduct a performance test on the Zurn hog-fuel boiler to demonstrate compliance with the opacity limit, the PM₁₀ lb/hr emissions limit, and the grain loading standard, and to determine the CO one-hour average emission rate.

The following information, at a minimum, shall be recorded during each performance test run and included in the performance test report:

- *The pressure drop across the multiclone and the ID fan outlet (scrubber inlet) pressure shall be recorded in inches of water at least once each 15 minutes during each test run;*

Verbiage of how measurements of the pressure were updated to reflect language in the CAM plan in the Tier I and to be more consistent with onsite measurement locations. Also, the initial CO test was conducted on July 28, 2010. The results suggest that the next test does not need to occur until July 28, 2015 at the latest. Therefore, the requirement of on or before June 29, 2011 was removed as it had become obsolete.

Existing Permit Condition 3.10

The permittee shall calculate and record the emissions of methanol and total HAPs from the hog-fuel boiler on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period. These totals shall be combined with the methanol and total HAPs emissions from the kilns for the same period to demonstrate compliance with the facility-wide HAPs limits.

The previous permitting actions did not adequately describe an appropriate method for calculating HAPs emissions associated with the hog-fuel boiler. Methanol is the largest contributor to total HAPs. The total HAPs associated with the hog-fired boiler were estimated to be 9.193 T/yr as stated in Appendix B of permit P-2007.0107, issued October 7, 2009. However several of the toxics assumed to be federally regulated HAPs are in fact not. For example, methane was calculated to be the largest contributor at 3.83 T/yr is not a HAP as defined by the Clean Air Act. This results in only 5.363 T/yr of total HAPs for the boiler operating with an average steaming rate of 46,500 lb/hr. Should the boiler operate at the maximum permitted limit at 60,000 lb steam/hr, the total HAPs would reach 11.862 T/yr. Removal of the methane component and all other non-HAPs reduces the total boiler contribution to 6.56 T/yr. There are five toxic pollutants that are the primary contributors to the kiln toxic emissions. Methanol contributes over 50% of the total HAPs associated with the kilns. Worst case emissions factors were used to establish HAPs emissions. Also, the throughput of 157,585 thousand board feet is the permit limit. The kilns emit 18.9 T/yr in total HAPs. Should both the kilns and boiler operate at maximum permitted levels there is the potential that the total combined HAPs would exceed 25 T/yr. However, the permit is currently limited to 9.49 T/yr of any one HAP and 24.49 T/yr off all combined HAPs. Therefore Bennett is not a major facility for HAPs emissions. However, due to the potential, monitoring and recordkeeping of all HAPs associated with the boiler is necessary. While Methanol is the primary source and would trigger major first, the variability in fuel could create a situation where methanol emissions are less than 10 T/yr, but everything added together including the trace amount could result in a total of very near or exceeding 24.49 T/yr. Thus, the rationale for monitoring all HAPs associated with the boiler. The following calculation is a suggested method used to demonstrate compliance. This has been included in this Statement of Basis to help Bennett better understand what is expected of them in Permit Condition 3.10.

$$\frac{\sum \text{lb steam production}}{\text{month}} * \frac{\text{EF lb HAP}}{\text{MMBtu}} * \frac{7.836e^{-7} \text{ MMBtu} * \text{ton}}{\text{lb steam} * \text{lb}} = \text{ton HAP} / \text{month}$$

Where: EF lb HAP is the corresponding emission factor of each pollutant
 lb steam production is the total pounds of steam produced during one month.
 7.836e-7 is a multiplying factor that is derived from the equation below.

$$\frac{1050 \text{ Btu}}{\text{lb steam}} * \frac{1}{67\% \text{ eff}} * \frac{\text{MMBtu}}{1e^6 \text{ Btu}} * \frac{1 \text{ ton}}{2000 \text{ lb}} = \frac{7.836e^{-7} \text{ MMBtu} * \text{ton}}{\text{lb steam} * \text{lb}}$$

The intention is to determine the total amount of steam produced on a monthly basis. The 1,050 Btu/lb steam and the 67% efficiency were derived from the Bennett PTC application for the permit issued October 7, 2009. The efficiency percentage was an assumption made by Bennett. These were validated during the original PTC review. Oregon DEQ and AP-42, Table 1.6-3, were used as sources to establish all emission factors. Each monthly calculation should be summed together over 12 consecutive months to establish an annual total. The following table provides all HAPs that should be calculated and the appropriate emission factor as of the date of this document. Please note that emission factors may be subject to change and Bennett should always perform these calculations using the most up-to-date factors.

HAP Pollutant	Emission Factor (lb/MMBtu)	HAP Pollutant	Emission Factor (lb/MMBtu)
Acetaldehyde	8.3e-4	Styrene	1.9e-3
Acetophenone	3.2e-9	2,3,7,8 Tetrachlorodibenzo p dioxin	8.6e-12
Acrolein	4.0e-3	Toluene	9.2e-4
Benzene	3.3e-3	2,4,6 Trichlorophenol	2.2e-8
Bis(2-Ethylhexyl)phthalate	4.7e-8	Vinyl Chloride	1.8e-5
Carbon tetrachloride	4.5e-5	o-xylene	2.5e-5
Chlorine	7.9e-4	Antimony	7.9e-6
Chlorobenzene	3.3e-5	Arsenic	1.0e-6
Chloroform	2.8e-5	Beryllium	1.1e-6
2,4-Dinitrophenol	1.8e-7	Cadmium	4.1e-6
Ethylbenzene	3.1e-5	Chromium, total	5.9e-7
Formaldehyde	2.1e-3	Cobalt	1.9e-7
Hydrogen Chloride	6.7e-4	Lead	5.8e-6
Napthalene	9.7e-5	Manganese	1.5e-4
4-Nitrophenol	2.4e-7	Mercury	9.9e-7
Pentachlorophenol	5.1e-8	Nickel	3.3e-5
Phenol	5.1e-5	Selenium	3.0e-6
Propionaldehyde	6.1e-5	Methanol	8.3e-4

New Permit Condition 6.1

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

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency spark ignition with a rated capacity less than 500 bhp.

This condition is a description of the MACT subpart that applies to the emergency engine.

New Permit Condition 6.2

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

Bennett must comply with all applicable requirements of ZZZZ no later than May 3, 2013.

New Permit Condition 6.3

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

- *Change oil and filter every 500 hours of operation or annually, whichever comes first.*
- *Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.*
- *Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.*

This condition outlines the maintenance practices required by ZZZZ following the compliance date.

New Permit Condition 6.4

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

This condition requires that the engine be operated in a manner such that emissions are minimized as much as possible.

New Permit Condition 6.5

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

This conditions requires that the emergency engine be operated in accordance with manufacturer's specifications or a maintenance plan may be developed that is consistent with good air pollution control practices. Table 6 of the subpart reiterates this requirement.

New Permit Condition 6.6

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

A non-resettable hour meter is required for all emergency engines.

New Permit Condition 6.7

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

The subpart requires that startup time be limited to 30 minutes. After 30 minutes all applicable requirements must be met.

New Permit Condition 6.8

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

Rather than changing oil as frequently as required by the subpart, this condition allows Bennett Lumber to develop their oil analysis program. If the program meets all criteria stated in the condition changes in oil may occur less frequently than is defined in Permit Condition 6.3.

New Permit Condition 6.9

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

- (i) There is no time limit on the use of emergency stationary RICE in emergency situations.*
- (ii) The permittee may operate the emergency RICE for the purposes of maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.*
- (iii) The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hour per year provided for maintenance and testing.*

This condition accounts for specific requirements all emergency engines must abide by.

New Permit Condition 6.10

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

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

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

This condition outlines what type of records must be maintained and for what duration of time they must be kept.

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.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on December 14, 2010:

Facility Comment #1: Section 1.1 needs updating.

DEQ Response #1: DEQ realized that that the facility draft did not have the updated verbiage for Section 1.1 of the permit after it was submitted to Bennett for review. However, the new language was sent to Bennett and they confirmed the changes were acceptable in a December 14, 2010 email.

Facility Comment #2: The only specific comment we see, after the section 1.1 replacement is made, is that the Section 2.2 reference to Table 11; seems like that reference should be changed to Table 2.2.

DEQ Response #2: The requested changes were made, although the table in question should be Table 2.1 not 2.2.