

Statement of Basis

Permit to Construct No. P-2008.0150
Project ID 61237

Boise Cascade Wood Products LLC, Homedale Beam and Decking
Homedale, Idaho

Facility ID 073-00008

Final

October 30, 2013
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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

CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NAAQS	National Ambient Air Quality Standard
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
O ₂	oxygen
PC	permit condition
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
VOC	volatile organic compounds

FACILITY INFORMATION

Description

The Homedale Beam and Deck uses kiln dried lumber to manufacture laminated beams and laminated tongue and groove decking. Most of the kiln dried lumber used is Douglas Fir, but some Alaskan Cedar is used to produce specialty products. The facility consists of two manufacturing operations, laminated beams and a decking line.

The Beam Plant is comprised of Line 1 and Line 2. In the beam lines, pre-dried, graded lumber is processed through a finger-joiner. In this process, the lumber ends are cut to a special joint, glued and joined, and cured in a radio frequency dryer to form long lengths of lumber. Finger-joined lumber is used for beam manufacture. Cured lengths are glued face-to-face with adhesive to form large, structural beams. Beams are clamped and cured. After curing, the beams are planed, finished, and wrapped for shipment to retail dealers.

In the laminated Deck Plant, the lumber is graded, glue is applied face-to-face, and the lumber is placed in a cold press for curing. The ends are squared and cut with a tongue and groove (end-matched), and the deck boards are then molded. The roof deck members are sanded and wrapped for shipment to a retailer.

Supporting equipment and operations for these processes include lumber receiving and storage, glue receiving storage, mixing and transfer, maintenance and administrative buildings, equipment and raw material storage, finished product storage, a small fueling station, and storage of miscellaneous materials such as drums, metal, surplus parts, and other used items. For emergency fire control a pond is present on the site. Water is pumped from the Snake River to the pond with an electric pump. A 75 hp diesel-powered emergency pump is present to pressurize the fire system in the event of a power outage. This diesel pump operates approximately 10 hours per year for testing or maintenance purposes. The pump would be operated as needed to address an emergency situation.

Six shop-constructed wood stoves located in the Beam Plant and the Deck Plant provides room heat during cool weather periods. Testing in 2012 showed that the individual stoves have a heat input rating of <1,000,000 Btu/hr. Because of this, the wood stoves are exempt from emissions controls.

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 3, 2011	PTC issued to change the facility name from Filler King Company to Boise Cascade, LLC. (A) but will become (S) upon issuance of this permit.
February 24, 2009	Initial PTC issued to Filler King Company for its engineered wood products. (S)

Application Scope

This PTC is for a minor modification at an existing minor facility.

The applicant has proposed to:

- Revise the facility contact and responsible official
- Modify the percent of free formaldehyde concentration in the catalyst from 2.00% to 2.1%. Change the method of operation at the Beam plant line to use a radio frequency press. Eliminate the wood stoves for the permit since the stoves are exempted by IDAPA 58.01.01.220.02.d.

Application Chronology

July 10, 2013	DEQ received an application and an application fee.
July 31 – August 15, 2013	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
August 8, 2013	DEQ determined that the application was complete.
October 4, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 7, 2013	DEQ made available the draft permit and statement of basis for applicant review.
October 22, 2013	DEQ received the permit processing fee.
October 30, 2013	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment	Emission Point ID No.
Beam plant: Line 1, planer saws, finger jointer, Line 2: saw Manufacturer: Buss Planers Model: 60" and 30" Date of construction: 1988 and January 2007	<u>Control Device Name:</u> Cyclone C-2 Manufacturer: Western Pneumatics Control efficiency: 99% for PM Date of installation: 1988	2
Beam plant sander Manufacturer: Model: Date of construction: 1993	Baghouse BH-1 Manufacturer: Murphy Rogers Control efficiency: 99% for PM10 Date of installation: 1993	1
Deck plant moulder, saws, sander, planer Manufacturer: Madison Model: Madison Moulder Date of construction: 1993	Cyclone C-3 Manufacturer: Murphy Rogers Control efficiency: 99% for PM10 Date of installation: 1993	3
Beam plant bin truck loading	Enclosure	2
Beam plant: Line 2 planers, sanders, saws, finger jointer	Cyclone C-1 Western Pneumatics Control efficiency: 99% for PM Date of installation: 1993	2
Deck plant grade line saw	Cyclone C-4 Manufacturer: Murphy Rogers Control efficiency: 99% for PM Date on installation 1993	3
Deck plant bin truck loading	Enclosure	3

Emissions Inventories

This proposed action does not involve any change in the emissions inventory stated in the PTC issued June 3, 2011.

Ambient Air Quality Impact Analyses

This permitting action did not change the permitted emission limits of the permit. Therefore, the threshold for modeling was not reached.

Attainment Designation (40 CFR 81.313)

The facility is located in Owyhee County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The Homedale Beam and Decking plant has a minor classification for criteria pollutants. The potential to emit for criteria pollutants is below the applicable major source thresholds.

The potential to emit of the facility for formaldehyde is 0.5 tons per year, well below the applicable major source threshold of 10 tons per year. The facility's CO₂e production is less than the 100,000 tons per year threshold. Thus this facility is a minor source for HAPs.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

The permit application requested the percent of free formaldehyde concentration in the catalyst from 2.00% to 2.1%. The permit application stated the method of operation at the Beam plant line was changed to use a radio frequency press. The permit application requested the wood stoves be eliminated from the permit since the stoves are exempted by IDAPA 58.01.01.220.02.d

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400-410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM₁₀ emissions for point sources at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 3.4 and 3.9.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for any criteria pollutant or 10 tons per year for any one HAP (formaldehyde) or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

Homedale Beam and Decking plant has a 400 hp diesel-powered emergency engine for the fire water pump. 40 CFR 63, subpart ZZZZ has established requirements for this type of engine. Thus this facility is applicable to 40 CFR 63, subpart ZZZZ. The requirements of 40 CFR 63, subpart ZZZZ that may apply are listed below including permit condition 3.1 through permit condition 3.9.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been revised or modified as a result of this permitting action.

Existing Permit Condition 2.6

Wood stoves shall burn only wood without adhesives or other coatings.

The existing permit condition 2.6 has been eliminated for this permit because the wood stoves are eligible to be exempt under IDAPA 58.01.01.222.02.d.

Existing Permit Condition 2.7 was changed to Permit Condition 3.6.

Existing Permit Condition 2.8 was changed to Permit Condition 3.7

This permit condition has a slight change in wording for clarity and the concentration maximum for formaldehyde was increased from 2.0% to 2.1%.

Existing Permit Condition 2.9 was changed to Permit Condition 3.8.

Existing Permit Condition 2.10 was changed to Permit Condition 3.9.

Existing Permit Condition 2.11 was changed to Permit Condition 3.10.

Existing Permit Condition 2.12 was changed to Permit Condition 3.11.

New Permit Condition 3.12

This permit condition establishes the requirements to develop and implements the cyclone and baghouse operation, monitoring and maintenance manual. Included in the manual shall be those inspection, monitoring and maintenance requirements as needed to ensure each unit is operated at its highest reasonable efficiency.

New Permit Condition 4.1

§ 63.6595 When do I have to comply with this subpart?

(a) Affected sources. (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations, operating limitations and other requirements 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, operating limitations, and other requirements 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, operating limitations, and other requirements no later than October 19, 2013.

Permit condition 4.1 establishes the type of existing stationary CI RICE that is applicable and the date the engine is to meet the requirements of 40 CFR 63, subpart ZZZZ that are applicable.

New Permit Condition 4.2

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

(a) You must be in compliance with the emission limitations, operating limitations, and other requirements 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.

Permit Condition 4.2 establishes the general requirements that apply to the emission unit.

New Permit Condition 4.3

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

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

(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;**

(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

(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.

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

Permit Condition 4.3 establishes the monitoring, installation, collection, operation, and maintenance requirements for the applicable engine.

New Permit Condition 4.4

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

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

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in § 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

Permit Condition 4.4 establishes the continuous compliance requirements with the emission limitation, operating limitations that are applicable to the engine. This permit condition states the reporting requirement with the engine performs in manner outside these limitations.

New Permit Condition 4.5

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in § 63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in § 63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

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

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in § 63.6640(f)(2)(ii) or (iii) or § 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.

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

Permit Condition 4.5 establishes the records that must be kept to determine compliance with 40 CFR 63 subpart ZZZZ regarding the applicable engine.

New Permit Condition 4.6

§ 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 4.6 establishes the form and length of time the applicable records must be kept to maintain compliance with 40 CFR 63 subpart ZZZZ.

New permit Condition 4.7

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

Permit Condition 4.7 establishes the circumstances when the applicable engine can be operated outside the requirement established in Table 2D of this subpart and the reporting of this circumstances.

New Permit Condition 4.8

Applicability of General Provisions to Subpart ZZZZ.

Table 8 to Subpart ZZZZ of Part 63—Applicability of General Provisions to Subpart ZZZZ.
As stated in § 63.6665, you must comply with the following applicable general provisions.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.1	General applicability of the General Provisions	Yes.	
§ 63.2	Definitions	Yes	Additional terms defined in § 63.6675.
§ 63.3	Units and abbreviations	Yes.	
§ 63.4	Prohibited activities and circumvention	Yes.	
§ 63.5	Construction and reconstruction	Yes.	
§ 63.6(a)	Applicability	Yes.	
§ 63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes.	
§ 63.6(b)(5)	Notification	Yes.	
§ 63.6(b)(6)	[Reserved]		
§ 63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§ 63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	
§ 63.6(c)(3)-(4)	[Reserved]		
§ 63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§ 63.6(d)	[Reserved]		
§ 63.6(e)	Operation and maintenance	No.	
§ 63.6(f)(1)	Applicability of standards	No.	
§ 63.6(f)(2)	Methods for determining compliance	Yes.	
§ 63.6(f)(3)	Finding of compliance	Yes.	

§ 63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§ 63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§ 63.6(i)	Compliance extension procedures and criteria	Yes.	
§ 63.6(j)	Presidential compliance exemption	Yes.	
§ 63.7(a)(1)-(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§ 63.6610, 63.6611, and 63.6612.
§ 63.7(a)(3)	CAA section 114 authority	Yes.	
§ 63.7(d)	Testing facilities	Yes.	
§ 63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at § 63.6620.
§ 63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at § 63.6620.
§ 63.7(e)(3)	Test run duration	Yes.	
§ 63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§ 63.7(f)	Alternative test method provisions	Yes.	
§ 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§ 63.7(h)	Waiver of tests	Yes.	
§ 63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at § 63.6625.
§ 63.8(a)(2)	Performance specifications	Yes.	
§ 63.8(a)(3)	[Reserved]		
§ 63.8(a)(4)	Monitoring for control devices	No.	
§ 63.8(b)(1)	Monitoring	Yes.	
§ 63.8(b)(2)-(3)	Multiple effluents and multiple monitoring systems	Yes.	
§ 63.8(c)(1)	Monitoring system operation and maintenance	Yes.	

§ 63.8(c)(1)(i)	Routine and predictable SSM	No	
§ 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§ 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No	
§ 63.8(c)(2)-(3)	Monitoring system installation	Yes.	
§ 63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§ 63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§ 63.8(c)(6)-(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§ 63.8(d)	CMS quality control	Yes.	
§ 63.8(f)(1)-3)	Alternative monitoring method	Yes	Except that § 63.8(f)(4) only applies as specified in § 63.6645.
§ 63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§ 63.6635 and 63.6640.
§ 63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§ 63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(i)	Adjustment of submittal deadlines	Yes.	
§ 63.9(j)	Change in previous information	Yes.	
§ 63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§ 63.10(b)(1)	Record retention	Yes	Except that the most recent 2 years of data do not have to be retained on site.
§ 63.10(b)(2)(i)-(v)	Records related to SSM	No.	
§ 63.10(b)(2)(vi)-(xi)	Records	Yes.	

§ 63.10(b)(2)(xii)	Record when under waiver	Yes.	
§ 63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§ 63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§ 63.10(b)(3)	Records of applicability determination	Yes.	
§ 63.10(c)	Additional records for sources using CEMS	Yes	Except that § 63.10(c)(2)-(4) and (9) are reserved.
§ 63.10(d)(1)	General reporting requirements	Yes.	
§ 63.10(d)(2)	Report of performance test results	Yes.	
§ 63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.10(d)(4)	Progress reports	Yes.	
§ 63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	
§ 63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	
§ 63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§ 63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that § 63.10(e)(3)(i) (C) is reserved.
§ 63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§ 63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§ 63.11	Flares	No.	
§ 63.12	State authority and delegations	Yes.	
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by reference	Yes.	
§ 63.15	Availability of information	Yes.	

Permit Condition 4.8 list the general provisions that may be applicable to the CI RICE as they apply.

New Permit Condition 4.9

Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

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

As stated in §§ 63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
1. Non-Emergency, non-black start CI stationary RICE ≤ 300 HP	a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first; ¹ b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
2. Non-Emergency, non-black start CI stationary RICE $300 < \text{HP} \leq 500$	a. Limit concentration of CO in the stationary RICE exhaust to 49 ppmvd at 15 percent O ₂ ; or	
	b. Reduce CO emissions by 70 percent or more.	
3. Non-Emergency, non-black start CI stationary RICE > 500 HP	a. Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O ₂ ; or	
	b. Reduce CO emissions by 70 percent or more.	
4. Emergency stationary CI RICE and black start stationary CI RICE. ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹	
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first,	

	and replace as necessary; and	
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	
5. Emergency stationary SI RICE; black start stationary SI RICE; non-emergency, non-black start 4SLB stationary RICE >500 HP that operate 24 hours or less per calendar year; non-emergency, non-black start 4SRB stationary RICE >500 HP that operate 24 hours or less per calendar year. ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹ ; b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	
6. Non-emergency, non-black start 2SLB stationary RICE	a. Change oil and filter every 4,320 hours of operation or annually, whichever comes first; ¹	
	b. Inspect spark plugs every 4,320 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace as necessary.	
7. Non-emergency, non-black start 4SLB stationary RICE ≤500 HP	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; ¹	
	b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and	

	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	
8. Non-emergency, non-black start 4SLB remote stationary RICE >500 HP	a. Change oil and filter every 2,160 hours of operation or annually, whichever comes first; ¹	
	b. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.	
9. Non-emergency, non-black start 4SLB stationary RICE >500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year	Install an oxidation catalyst to reduce HAP emissions from the stationary RICE.	
10. Non-emergency, non-black start 4SRB stationary RICE ≤500 HP	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; ¹	
	b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	
11. Non-emergency, non-black start 4SRB remote stationary RICE >500 HP	a. Change oil and filter every 2,160 hours of operation or annually, whichever comes first; ¹	
	b. Inspect spark plugs every 2,160 hours of	

	operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.	
12. Non-emergency, non-black start 4SRB stationary RICE >500 HP that are not remote stationary RICE and that operate more than 24 hours per calendar year	Install NSCR to reduce HAP emissions from the stationary RICE.	
13. Non-emergency, non-black start stationary RICE which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; ¹ b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and	
	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	

¹ Sources have the option to utilize an oil analysis program as described in § 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

² If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

Permit Condition 4.9 establishes the operation requirements for the applicable an emergency stationary CI RICE as they apply.

Permit Condition 5.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Permit Condition 5.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Permit Condition 5.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Permit Condition 5.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Permit Condition 5.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Permit Condition 5.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Permit Condition 5.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Permit Condition 5.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Permit Condition 5.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Permit Condition 5.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Permit Condition 5.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Permit Condition 5.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Permit Condition 5.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Permit Condition 5.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Permit Condition 5.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Permit Condition 5.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on October 23, 2013:

Facility Comment: Table 1.1 of the PTC has the permit sections number incorrectly.

DEQ Response: The permit sections of Table 1.1 were corrected to correspond to the correct section number.

Facility Comment: The emergency fire pump in Table 1.1 is labeled as 75 hp and should be 400 hp.

DEQ Response: This emergency fire pump in Table 1.1 has been corrected.

Facility Comment: Regarding permit condition 2.2, we will implement a fugitive emissions control plan that includes appropriate control strategies, the frequency of observations and required corrective actions if fugitive emissions that may be discharged from the facility across the property line are observed. However, generating records of the frequency and methods used to reasonably control fugitives will be very cumbersome and difficult to maintain. We believe this condition should be eliminated. Further, we believe Condition 2.4 is inclusive of what is stated in Condition 2.2.

DEQ Response: This is standard fugitive emission language used in current PTC templates.

Facility Comment: The emergency fire pump in Condition 3.1 is labeled as 75 hp and should be 400 hp.

DEQ Response: This emergency fire pump in Condition 3.1 has been corrected.

Facility Comment: Add the following text to Condition 3.1: "Biomass burned in the wood stoves includes traditional fire wood, scrap lumber (un-painted), beam and deck cut-off ends, off spec beam and deck materials, planer shavings, etc., which contain a small percentage of cured glue".

DEQ Response: The process description has been changed to reflect the recommended text.

Facility Comment: Add "per CH2M-Hill Modeling, PTC application 2/2008" after Emission Points in Table 3.1.

DEQ Response: The proposed language has been added to Table 3.1.

Facility Comment: Add "listed in Table 3.1" behind Point Sources in Condition 3.9.

DEQ Response: The proposed language has been added to Permit Condition 3.9.

Facility Comment: Permit Condition 3.12 is redundant and captured under Condition 3.11.

DEQ Response: Permit Condition 3.12 has been deleted.

Facility Comment: In Permit Condition 3.12, the condition should reference Permit Condition 5.2.

DEQ Response: Permit Condition 3.12 has been changed to reference Permit Condition 5.2.

Facility Comment: Under Section 4, the process description references the emergency fire pump as 75 hp. This should be 400 hp.

DEQ Response: The emergency fire pump in Section 4 has been corrected to 400 hp.

Facility Comment: Table 1.1 of the PTC has the permit sections number incorrectly.

DEQ Response: The permit sections of Table 1.1 were corrected to correspond to the correct section number.

Facility Comment: Under MACT Applicability in the Statement of Basis, the diesel-powered emergency engine should be corrected to 400 hp.

DEQ Response: The emergency engine description has been corrected.

Facility Comment: Table 1.1 of the PTC has the permit sections number incorrectly.

DEQ Response: The permit sections of Table 1.1 were corrected to correspond to the correct section number.

APPENDIX B – 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: Boise Cascade Wood Products LLC,
Address: East Pioneer Road
City: Homedale
State: ID
Zip Code: 83628
Facility Contact: Bart Barlow
Title: Environmental Engineering Manager
AIRS No.: 073-00008

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- Y** 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	\$ 1,000.00		

Comments:

