

STATEMENT OF BASIS
Boise Cascade Wood Products, LLC
Thorsby Engineered Wood Products
Thorsby, Chilton County, Alabama
Facility/Permit No. 403-S006

This draft Title V Major Source Operating Permit (MSOP) 4th renewal is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. The current MSOP was issued on January 24, 2018, and expires on March 11, 2021. This renewal incorporates some changes from the current MSOP.

Facility Operations

Boise Cascade Wood Products LLC (BC) operates a laminated veneer lumber (LVL) mill in Thorsby, Alabama. The significant sources of air pollutants at this facility are a 61.77 MMBtu/hr wood-fired boiler with a dual multiclone and wet scrubber (EU-001); a steam-heated veneer dryer exhausted to a Regenerative Catalytic Oxidizer/Regenerative Thermal Oxidizer (RCO/RTO) (EU-002); a laminated veneer lumber (LVL) press (EU-003); a Composer, Feederline, and Finishing Processes exhausting to three baghouses (EU-004); Surface Coating operations (EU-006); 131 Hp natural gas-fired emergency generator engine (EU-008); a 175 Hp diesel-fired emergency fire pump (EU-009) a thermal oil heater (EU-010); a veneer moisture equalization chamber (EU-011); adhesive storage tanks (EU-012); and log soaking vats (EU-013). Insignificant emission sources at this facility include log receiving, sizing, and debarking operations; a plywood hog chipper; veneer stripping operations; edge coating operations; veneer stacking and other dry wood handling operations.

Changes proposed for Renewal MSOP

BC requests the following changes to the MSOP renewal:

Currently EU-001 has the option to burn used oil that generated on-site due to spills. BC has requested the removal of this option (EU-001, 2(h)).

Applicability: Federal Regulations

Title V

This facility is considered a major source under Title V regulations because potential emissions for particulate matter (PM), carbon monoxide (CO), and volatile organic compounds (VOC) each exceed the 100 TPY major source threshold. The facility is a major source for Hazardous Air Pollutants (HAP) because the potential emission of methanol exceeds the 10 TPY (13.50 TPY) major source threshold and the potential emissions of combined HAP exceed the 25 TPY (41.9 TPY) major source threshold.

Prevention of Significant Deterioration (PSD)

This facility is located in an attainment area for all criteria pollutants, and the facility operations are not one of the listed 28 major source categories. Therefore, the major source threshold is 250 TPY. The facility is a synthetic minor source because the wood-fired boiler has a CO emission limit of 51.27 lb/hr, the veneer dryer has a TSP/PM₁₀ emission limits of 6.16 lb/hr, and the 175-Hp Cummins Diesel-fired Fire Pump Engine is limited to 500 hours per year. These limits were established to restrict the facility-wide potential emissions below the major source threshold.

New Source Performance Standards (NSPS), 40 CFR 60

40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units

The wood-fired boiler is not subject to the NSPS for Small Industrial Commercial Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, since it was constructed prior to the June 1989 applicability date. The TOH that supplies hot oil to the LVL press is not subject to NSPS, Subpart Dc, because its heat input capacity (6.0 MMBtu/hr) is less than the 10 MMBtu/hr applicability threshold.

40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engine

The 131 Hp Natural Gas-fired Emergency Generator Engine is not subject to the New Source Performance Standards for engines (40 CFR 60, Subpart JJJJ) because it was manufactured prior to the applicability date.

40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engine

The 175 Hp Cummins Diesel-fired Emergency Fire Pump Engine is subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) because the certified engine was manufactured after applicability date. This engine is classified as 2009+ model year fire pump engine with a power rating of $175 \leq \text{Hp} < 300$ and a displacement of less than 30 liters per cylinder. The applicable emission standards outlined in Table 4 to Subpart IIII would be $\text{NMHC} + \text{NO}_x \leq 3.0 \text{ g/HP-hr}$, $\text{CO} \leq 2.6 \text{ g/HP-hr}$, and $\text{PM} \leq 0.15 \text{ g/HP-hr}$. 40 CFR §60.4206 requires that the engine be operated and maintained according to manufacturer approved procedures over the entire life of the engine. 40 CFR §60.4207(b) requires that diesel-fired CI ICE utilize fuel with a sulfur content of $\leq 15 \text{ ppm}$ and a Cetane index ≥ 40 or aromatic content $\leq 35\%$ by volume. The engine is required to be equipped with a non-resettable hour meter and must be operated only during emergency situations, with the exception of 100 hours per year for maintenance checks and readiness testing, and 50 hours per year for non-emergency situations (which is included in the 100 hours during any calendar year).

There are no other emission units in an NSPS source category at the facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63

40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (PCWP MACT)

As a major source of HAP, each emission unit associated with LVL production (except the wood-fired boiler and TOH) is considered an affected source under the 40 CFR 63, Subpart DDDD (PCWP MACT). However, only the veneer dryer and the coating operations have emission standards and/or work practice requirements under this MACT. For the coating operations that meet the definition of a Group 1 miscellaneous coating operation (the Header Line surface coating operations), the facility is required to demonstrate that only coatings meeting the definition of non-HAP coatings are utilized. For the veneer dryer, the facility is required to meet at least one of the six following compliance options:

- (a) Reduce emissions of total HAP, measured as THC (as carbon), by 90 percent; or
- (b) Limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd; or
- (c) Reduce methanol emissions by 90 percent; or
- (d) Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
- (e) Reduce formaldehyde emissions by 90 percent; or
- (f) Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.

In addition to an emission standard for the veneer dryer, the facility is required to meet the following operating and work practice requirements:

Operating Requirement (RCO Mode): In accordance with 40 CFR §63.2240(b) and Table 2 to Subpart DDDD, while operating in RCO mode, the permittee shall:

- (a) Maintain the 3 hour block average catalytic oxidizer temperature above the minimum temperature established during the performance test; and
- (b) Check the activity level of a representative sample of the catalyst at least every 12 months.

Operating Requirement (RTO Mode): In accordance with 40 CFR §63.2240(b) and Table 2 to Subpart DDDD, while operating in RTO mode, the permittee shall maintain the 3-hour block average firebox temperature of the control device above the minimum temperature established during the performance test.

Work Practice Requirement: The permittee shall minimize fugitive emissions from the veneer dryer doors through proper maintenance procedures and from the green end of the dryers through proper balancing of the heated zone exhausts.

Pursuant to 40 CFR §63.2251, the facility has an approved routine control device maintenance exemption (RCDME) for the RCO/RTO controlling the veneer dryer. The compliance options and operating requirements do not apply during times when control device maintenance covered under the approved RCDME is performed. However, the RCDME periods cannot exceed 0.5 percent of annual operating uptime for the veneer dryer, and the facility must minimize emissions to the greatest extent possible during these RCDME periods. To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is also shut down.

The facility is required to maintain records of all monitoring data for the RTO/RCO, maintain records demonstrating that only non-HAP coatings are utilized in the Header Line surface coating operations, and maintain records documenting that the facility is following its plan for minimizing fugitive emissions from the veneer dryer.

40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)

The two emergency engines are affected sources under 40 CFR 63, Subpart ZZZZ (RICE MACT). The 175 Hp diesel-fired emergency fire pump engine is classified as a new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions. According to 40 CFR §63.6590(c)(6), this engine meets the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. No further requirements apply to this engine under Subpart ZZZZ.

The 131 Hp natural gas-fired emergency generator engine is classified as an existing emergency spark ignition RICE ≤500 Hp located at a major source of HAP emissions. BC must comply with the following requirements under the RICE MACT for the natural gas-fired engine:

1. Comply with the applicable requirements of 40 CFR §63.6602 and Table 2c to Subpart ZZZZ, which include:
 - (i) Meet the following work practice requirements, except during periods of startup:
 - A. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - B. Inspect spark plugs (SI engine) 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.
 - (ii) During periods of startup, 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. BC shall not operate this unit except as provided in 40 CFR §63.6640(f)(1) through (f)(4), which include:
 - (i) Emergency situations;
 - (ii) Maintenance checks and readiness testing, not to exceed 100 hours per year; and
 - (iii) Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing).
3. BC shall operate and maintain the unit according to the manufacturer's emission-related written instructions or develop a maintenance plan that provides for, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
4. BC shall install a non-resettable hour meter if one is not already installed.
5. BC shall keep records of the operation and maintenance of the unit in accordance with 40 CFR §63.6655.
6. BC shall maintain on site for the life of the unit either a copy of the manufacturer's emission-related operation and maintenance instructions for the unit or the maintenance plan developed in accordance with 40 CFR §63.6625(e) for the unit.
7. BC shall report to the Air Division any failure to perform a work practice on the schedule required, including instances when the work practice standard was not performed due to emergency operation or unacceptable risk under a federal, state, or local law. BC shall submit the report within two working days of the deviation and shall provide an explanation as to why the work practice requirement was not performed.

The facility is required to maintain the following records for the engine:

- (1) For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as "emergency operation," the records shall reflect what classified the operation as emergency;
- (2) The total number of hours the engine was operated during a calendar year subtotaled by the reason the engine was in operation;
- (3) The dates of each oil and filter change with the corresponding hour on the hour meter;
- (4) The dates of each inspection and replacement of spark plugs, hoses, and belts with the corresponding hour on the hour meter;
- (5) The dates and nature of other emission-related repairs and maintenance performed; and

- (6) A copy of the manufacturer's emission-related operation and maintenance instructions for the unit or the maintenance plan developed in accordance with 40 CFR §63.6625(e) for the unit.

40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT)

As a major source of HAP, the 61.77 MMBtu/hr wood-fired boiler and the 6.0 MMBtu/hr natural gas-fired Thermal Oil Heater (TOH) are affected sources under 40 CFR 63, Subpart DDDDD (Boiler MACT). The wood-fired boiler is classified as an existing hybrid suspension/grate burner designed to burn wet biomass/bio-based solid. The natural gas fired TOH is classified as an existing unit designed to burn gas 1 fuels. As existing sources, the compliance date for this subpart is no later than January 31, 2016, as specified in 40 CFR §63.7495. BC has elected to demonstrate continuous compliance through initial and ongoing performance stack testing, performing annual/biennial tune-ups, conducting required monitoring, and the submittal of required notifications and reports as specified under Boiler MACT.

The wood-fired boiler is subject to emission limitations for CO and PM as listed in Table 2. CO must not exceed 3500 ppm by volume on a dry basis corrected to 3 percent oxygen. However, this boiler is subject to a more stringent CO limit of 51.27 lb/hr, which it will continue to meet. PM must not exceed 0.44 lb per MMBtu of heat input. As a unit designed to burn solid fuel, this boiler is subject to an emissions limitation for hydrochloric acid (HCl) and mercury. HCl must not exceed 0.022 pounds per MMBtu of heat input and mercury must not exceed 0.0000057 pounds per MMBtu of heat input. BC has elected to demonstrate compliance with these limitations through stack testing, using the methods listed on Table 2 of Subpart DDDDD.

The wood-fired boiler is subject to work practice standards listed in Table 3 of this subpart. BC must conduct a tune-up of the boiler annually as specified in 40 CFR §63.7540. The initial tune-up was conducted on November 5, 2015. Each annual tune-up must be conducted no more than 13 months after the previous tune-up according to 40 CFR §63.7515(d). Additionally, BC must conduct a one-time energy assessment performed by a qualified energy assessor. This assessment was performed on May 18-20, 2015, in accordance with 40 CFR §63.7510(e) and Table 3 of Subpart DDDDD.

The wood-fired boiler is subject to operating limitations listed on Table 4 of Subpart DDDDD. For the PM scrubber control without a PM continuous parameter monitoring system (CPMS), BC must maintain the 30-day rolling average pressure drop and the 30-day rolling average liquid flow rate at or above the lowest one-hour average pressure drop and the lowest one-hour average liquid flow rate, respectively, measured during the performance test demonstrating compliance with the PM, Hg, and HCl emission limitation according to 40 CFR §63.7530(b) and Table 7 of Subpart DDDDD. BC must maintain the 30-day rolling average operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test. BC has an oxygen analyzer system for the wood-fired boiler as specified in 40 CFR §63.7525(a). BC must maintain the 30-day rolling average oxygen content at or above the lowest hourly average oxygen concentration measured during the CO performance test.

BC is required to conduct performance stack testing for initial compliance and has elected to demonstrate continuous compliance through ongoing performance stack testing. Initial compliance testing must be completed no later than 180 days after January 31, 2016, for BC, and conducted as specified in 40 CFR §63.7510. Subsequent performance testing must be completed in accordance with 40 CFR §63.7520 and Table 5 of Subpart DDDDD, on an annual basis. Annual performance tests must be completed no more than 13 months after the previous performance test, except as specified in 40 CFR §63.7515(b) through (e). Performance stack testing will be used to establish site-specific operating limits that apply to BC in accordance with 40 CFR §63.7530(b). BC must complete and submit the Notification of Compliance Status according to 40 CFR §63.7530 (e) and (f), and 40 CFR §63.7545(e). A Notification of Intent to conduct performance testing must be submitted at least 60 days before the performance test is scheduled to begin. BC has completed the initial testing for compliance with the Subpart.

BC must monitor and collect data according to 40 CFR §63.7535 and the site-specific monitoring plan. 40 CFR §63.7540 and Table 8 of Subpart DDDDD provides detailed monitoring requirements for continuous compliance monitoring. Deviations must be reported according to the requirements in 40 CFR §63.7550. Reporting requirements listed in 40 CFR §63.7550 and Table 9 of Subpart DDDDD requires semiannual reporting for the wood-fired boiler. The first compliance report must cover the period from January 31, 2016, through December 31, 2016, and must be postmarked or submitted no later than January 30, 2017. Each subsequent compliance report must cover the semiannual reporting period from January 1st through June 30th or July 1st through December 31st. Each semiannual compliance report must be postmarked or submitted no later than July 30th or January 30th, whichever is the first date following the end of the semiannual reporting period. Each semiannual report must contain the information outlined by 40 CFR §63.7550(c).

The thermal oil heater (TOH) is not subject to emission or operating limits under Boiler MACT, in accordance with 40 CFR §63.7500(e). The TOH is subject to work practice standards requiring biennial tune-ups, conducted in accordance with 40 CFR §63.7500. The first biennial tune-up was conducted on November 26, 2015. Each biennial tune-up specified in 40 CFR §63.7540(a)(11) must be conducted no more than 25 months after the previous tune-up. According to 40 CFR §63.7550, compliance reports for this unit must be submitted biennially. The first biennial compliance report must cover the period beginning on the compliance date, January 31, 2016, and ending on December 31, 2018, and must be postmarked or submitted no later than January 31, 2019. Subsequent reports must cover the applicable 2-year period from January 1st to December 31st. All compliance reports must be postmarked or submitted no later than January 31st, biennially. Each compliance report must contain the information outlined by 40 CFR §63.7550(c).

Applicability: State Regulations

Particulate Matter

The wood-fired boiler is subject to the particulate (as TSP) emission limitations of ADEM Admin. Code r. 335-3-4-.08(2), which limits the boiler to 0.20 gr/dscf, adjusted to 50% excess air, when burning only wood, and 0.17 gr/dscf, adjusted to 50% excess air, when burning a combination of wood and gaseous fuel.

The remaining processes (i.e. the veneer dryer, LVL press, and finishing processes), except the TOH, are each subject to the particulate matter emission limit of ADEM Admin. Code r. 335-3-4-.04 for general process industries. The allowable emission rate for each of the processes is calculated by using the appropriate process weight equation:

$$E = 3.59(P)^{0.62} \text{ (P <30 tons per hour)}$$

OR

$$E = 17.31(P)^{0.16} \text{ (P >30 tons per hour)}$$

Where E = Emissions in pounds an hour

P = Process weight in tons per hour

In addition to the above limitations, ADEM Admin Code r. 335-3-4-.01(1) sets a visible emission standard which states that the permittee shall not discharge more than one six-minute average opacity greater than 20% during any 60-minute period from any source and at no time shall the permittee discharge a six-minute average opacity of particulate emissions greater than 40% from any source.

Sulfur Dioxide

The wood-fired boiler and TOH are subject to a sulfur dioxide (SO_x) emissions limitation of 4 lb/MMBtu of heat input for fuel burning equipment in accordance with ADEM Admin Code r. 335-3-5-.01(1)(b).

Emissions Testing and Monitoring

001-Wood-fired Boiler (61.77 MMBtu/hr Wood-fired Boiler with Dual Multiclone and Venturi Wet Scrubber)

This boiler is equipped with a dual multiclone and Venturi Wet Scrubber for the capture of particulate emissions from the gas stream. A particulate emission test was conducted on this boiler by the Air Division in November 2005. The results of this testing indicated that this boiler was operating at 22% (0.0449 gr/dscf, adjusted to 50% excess air) of the State allowable emission rate (0.20 gr/dscf, adjusted to 50% excess air). Based on the results of this testing, the renewal MSOP would not require emission testing for PM. However, monitoring for the proper operation of the wet scrubber would be required.

BC is required to use a portable emission analyzer to obtain monthly CO concentration values (ppmvd) of the boiler exhaust. The monitoring is comprised of three consecutive runs, with each run comprised of four readings taken at 15-minute intervals. BC has established 840 ppmv corrected to 8% O₂ as the action level for the CO analyzer. If the CO concentrations are higher than 840 ppmv, BC would be required to conduct an investigation within 24 hours to determine the cause and corrective action for the high CO reading. After implementation of the corrective action, BC is required to monitor the CO again and the record the value. If the CO concentration is at or below the action level, the investigation would be considered complete and monitoring would be concluded for that month. If the CO concentration remains higher than the action level,

BC is required to conduct a CO emissions test using EPA Reference Method 10 within 60 days to determine if the boiler is exceeding its emission limit. BC would also be required to conduct an annual CO emission test utilizing EPA Reference Method 10.

Although the boiler is also subject to the SIP SO₂ allowable emission rate of 4.0 lb/MMBtu of heat input, wood residuals are the primary fuel source for this boiler. Due to the minimal expected SO₂ emissions from the combustion of wood, no emission testing or monitoring for SO₂ would be considered necessary.

002 - Veneer Dryer

BC conducted performance tests to determine compliance for the veneer dryer while processing hardwood (February 18, 2009) and softwood (May 5, 2009). No further performance testing is required by the PCWP MACT at this time. To monitor compliance with the operating requirement, the facility is required to monitor and record the catalytic oxidizer/firebox temperature, reduce the data to 3-hour averages, and maintain the 3-hour average about the minimum temperature established during the performance test. For the work practice requirements, the facility is required to document that its plan for minimizing fugitive emissions from the doors and the green end of the dryer is being followed.

003 - Oil-Heated Laminated Veneer Lumber (LVL) Press

The LVL press is oil-heated. Emissions from the press are primarily VOC/HAP from the glue used to laminate the veneer. Emissions of particulate matter would be negligible. Due to the nature of the emissions from the press, emission testing and monitoring for the SIP visible emission and particulate standards would not be considered practical. Emissions from this process are controlled by baghouse SN-03 (emission point 004C).

004 – Composer, Feederline, and Finishing with Two (2) Cyclones and Three (3) Baghouses

This process utilizes a baghouse (SN-03) to control particulate emissions from the feederline and the building. Particulate matter from SN-03 and the composer operation is processed through two cyclone separators and a baghouse (SN-02) before venting to atmosphere. Lastly, this process utilizes a baghouse (SN-01) to control particulate emissions exclusively from the various saws after the press. To monitor compliance with the particulate and visible emission standards, emission monitoring for each baghouse would include:

- While the process is operating, someone familiar with the process shall observe each baghouse at least daily during daylight hours for any visible emissions.
- Whenever visible emissions are observed, corrective action to minimize emissions shall be initiated within 24 hours, followed by an additional observation to confirm that emissions are eliminated.
- Each baghouse shall be inspected for proper operation at least annually, but more frequently whenever visible emissions are observed. If the results of the inspection indicate that cleaning or maintenance is needed, such action shall be initiated within 24 hours of completing the inspection.

006 - Header Line surface coating operations

For the work practice requirements of the PCWP MACT for the Group 1 Miscellaneous Coating Operations (Header Line Surface Coating Operations), the facility is required to maintain records that demonstrate that only coatings meeting the definition of non-HAP coatings are utilized.

Compliance Assurance Monitoring (CAM)

The wood-fired boiler is subject to CAM, however the Boiler MACT contains requirements that meet or exceed the current requirements for particulate and carbon dioxide. The baghouses associated with EU 004 would not be subject to CAM because the pre-control emissions would be less than the major source threshold.

Recordkeeping and Reporting

Wood-Fired Boiler

For both the boiler and TOH, BC must keep records of each notification and report submitted to comply with Boiler MACT. According to 40 CFR §§63.7555 and 63.7550, BC must maintain records of each occurrence, measurement, maintenance, corrective action, report, or record in a form suitable and readily available for review for a period of 5 year from the date of generation. Records must be on site for at least 2 years after the date of generation and can be kept off-site for the remaining 3 years. Specific recordkeeping for the boiler and TOH are outlined under 40 CFR §63.7555. These records would include (as applicable):

- All monitoring data and values collected/calculated during the scheduled monthly CO and O₂ monitoring as well as CO monitoring conducted following a corrective action;
- Scrubber liquid flow and pressure drop monitor readings and the calculated 3-hour block averages;
- The date, time, nature, and results of any investigation conducted as a result of monthly CO emission monitoring or when excursions from an emission monitoring parameter threshold were observed;
- The date(s), nature, and results of any corrective action taken as a result of an investigation conducted as a result of monthly CO emission monitoring or when excursions from an emission monitoring parameter threshold were observed;
- The date and results of the annual calibrations of the scrubber liquid flow and pressure drop monitors; and,
- The date(s) the control device was inspected for proper operation and, if the results of the inspection indicated that cleaning or emission-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.

In addition, BC would be required to include the following information (as applicable) in the Semiannual Monitoring Report required by General Permit Proviso No. 21:

- A statement describing the emission monitoring that was required during the reporting period, whether all emission monitoring was completed as required, and if not, the date(s) and reasons(s) why the monitoring was not performed;
- A statement as to whether the annual inspection(s) of the control device(s) or annual calibrations of the scrubber liquid flow and pressure drop monitors were accomplished during the reporting period, and if so, the date and results of the inspection(s); and,
- The date(s), nature, and results of any corrective action taken when (1) a deviation from an emission monitoring parameter was observed or (2) an inspection of the control device indicated that cleaning or emission-related maintenance was needed.

Veneer Dryer exhausting to RCO/RTO

The PCWP MACT requires that the facility submit a semiannual compliance report containing the information required by 40 CFR §63.2281, which includes any deviations from compliance options, operating requirements, and work practice requirements, as well as any Start-up, Shutdown, and Maintenance (SSM) events that are consistent with the facility's SSM plan. Should the facility have a startup, shutdown, or malfunction during the reporting period that is not consistent with its SSM plan, the facility must submit an immediate SSM report to the Air Division within two working days of the event.

Composer, Feederline, and Finishing processes

BC would be required to maintain records of the required emission monitoring on-site in a permanent form suitable for inspection and readily available for inspection for at least five (5) years from the date of generation of each record. These records would include (as applicable):

- The date, time, and results of each daily visible emission observation;
- The date(s), nature, and results of any corrective action taken when deviations from an emission monitoring parameter were observed; and
- The date(s) the control device was inspected for proper operation and, if the results of the inspection indicated that cleaning or emission-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.

175 Hp Emergency Fire Pump Engine

To demonstrate compliance with the NSPS operational limitations, BC shall maintain records of the date, time, duration, and purpose of operation each time the fire pump engine is operated. To demonstrate compliance with the fuel limitations, BC shall maintain records of the sulfur content

and either the Cetane index or aromatic content of the diesel fuel that is burned in the fire pump engine. All records shall be maintained in a form suitable for inspection and shall be retained for a period of five years from the date of generation.

BC would be required to include the following information (as applicable) in the Semiannual Monitoring Report required by General Permit Proviso No. 21:

- A statement describing the emission monitoring that was required during the reporting period, whether all emission monitoring was completed as required, and if not, the date(s) and reasons(s) why the monitoring was not performed;
- A statement as to whether the annual inspection(s) of the control device(s) or annual calibrations of pressure drop monitors were accomplished during the reporting period, and if so, the date and results of the inspection(s); and,
- The date(s), nature, and results of any corrective action taken when (1) a deviation from an emission monitoring parameter was observed or (2) an inspection of the control device indicated that cleaning or emission-related maintenance was needed.

Veneer Equalization Chamber/Area Heaters

There are no recordkeeping or reporting requirements for this unit.

Recommendation

Based on the above analysis, I recommend that Boise Cascade Wood Products, LLC, be issued a Major Source Operating Permit (403-S006) renewal with the above conditions pending the resolution of any comments received during the 30-day public comment period and 45-day EPA review period.

Corey D. Ohme
Chemical Branch
Air Division

Date