

United States Environmental Protection Agency General Air Quality Permit for New or Modified Minor Sources of Air Pollution in Indian Country

http://www.epa.gov/air/tribal/tribalnsr.html

Questionnaire for Requesting Coverage under the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities in Indian Country

Last Modified: July 1, 2016 Version 1.0

Does the General Permit apply to my facility?

This questionnaire is intended to help you, the facility owner or operator, determine whether you are eligible for the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities. You are not required to complete it and this questionnaire is not necessary to apply for the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities. This questionnaire does not cover all of the General Air Quality Permit requirements and does not guarantee approval of a minor source preconstruction permit under this program. This General Air Quality Permit is available to true minor and synthetic minor sources of regulated New Source Review (NSR) pollutants.

Description of Sawmill Facilities

A sawmill facility is an operation that processes raw timber into dimensional lumber for shipping and eventual sale. A sawmill's basic operation is much like those of hundreds of years ago; a log enters on one end and dimensional lumber exits on the other end. Sawmill activities include sawing, planing, sanding, chipping and drying wood. Sawmill operations can include the drying of wood in kilns.

About this Questionnaire

The questions focus on general information pertaining to your existing or future sawmill facility. The questionnaire is not meant to be exhaustive and only requires knowledge of basic facility information, including process rates, raw material throughput, and fuel usage.

You should continue with this Questionnaire if you meet all of the following criteria:

- You plan to construct a new true or synthetic minor source sawmill facility OR plan to modify the operations at an existing minor source sawmill facility;
- You are not planning to construct or modify an existing major source sawmill facility;
- Your new or modified minor source sawmill facility is located within Indian country;
- You do not know whether your facility needs a permit, or if you do not know the attainment status of your area and you want to find out whether or not you should apply for the General Permit for a sawmill facility; and
- You intend to satisfy the processes that the U.S. Environmental Protection Agency (EPA) has made available in the application documents for this General Permit to address threatened and endangered species and historic properties under the Endangered Species Act and the National Historic Preservation Act, respectively.

More Information

The definition of a "modification" and "potential to emit" (PTE) can be found at 40 CFR 49.152(d) and in the "Instructions" document. Additional information on the applicability of the Federal Indian Country Minor NSR rule can be found at 40 CFR 49.153.

Information on the air quality attainment status of the area where your facility is located can be found at: http://www.epa.gov/airquality/greenbook/. You may also contact your reviewing authority for information on your attainment status.

Information on any available voluntary consensus standards that can used as alternatives to the emissions measurement standards in the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities can be found in: "Voluntary Consensus Standard Results for General Permits and Permits by Rule for the Indian Country Minor New

Source Review Program; 40 CFR Part 49, Subparts 156(c) and 162," memorandum from Robin Segall, Acting Group Leader, Measurement Technology Group, to Laura McKelvey, Community and Tribal Programs Group, February 7, 2014, http://www.epa.gov/air/tribal/tribalnsr.html.

Sources eligible for the General Permit for New or Modified Minor Source Sawmill Facilities may also be subject to federal standards under Subpart Dc of 40 CFR Part 60 - New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units. The conditions applicable to sources seeking coverage under this General Permit are intended to be generally consistent with the requirements in this regulation; however, compliance with the applicable requirements is required independent of the conditions in the General Permit, and not all requirements applicable under Subpart Dc are necessarily included in the General Permit. The Background Document for the General Permit identifies the specific requirements in these Subparts that are intended to be included in the General Permit.

Please contact your reviewing authority if you have questions or need assistance. A list of reviewing authorities, their areas of coverage, and contact information can be found in Attachment E to the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities or by visiting: http://www.epa.gov/air/tribal/tribalnsr.html.

Questionnaire for Sawmill Facilities

Part 1: Does my Sawmill Facility Need a Minor Source Permit?

The following questions are meant to determine whether or not your sawmill facility needs or qualifies for this General Permit.

1.	Will your facility be a minor source of hazardous air pollutants (HAP)? If the PTE of your facility will be less than 10 tons per year (tpy) for a single HAP and less than 25 tpy for any combination of HAPs, your source will be a minor source of HAPs. The emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html . Be sure to include all existing, new, and modified emission units at your facility.
	☐ Yes ☐ No
	If you answered 'No,' your source can qualify for the general permit if you request a synthetic minor HAP limit. If you answered 'Yes,' or intend to request a synthetic minor HAP limit continue on to the next question. If you answered 'No' and do not intend to request a synthetic minor HAP limit, your source is not eligible for the General Permit and you must request a site specific permit.
2.	Will the PTE of your facility be less than 250 tpy for particulate matter (PM, PM_{10} , or $PM_{2.5}$), volatile organic compounds (VOC), nitrogen oxides (NO _x), carbon monoxide (CO), and sulfur dioxide (SO ₂), each individually? Be sure to include all existing, new, and modified emission units at your facility.
	☐ Yes ☐ No
	If you answered 'No,' your source does not qualify for the General Permit. Please contact your reviewing authority to apply for a site-specific permit. If you answered 'Yes,' continue on to the next question. A synthetic minor source that agrees to the enforceable conditions in the General Permit and is below the thresholds above should answer 'Yes.'

3. Will the PTE of your new facility or the increase in potential emissions from your modified existing facility be equal to or above the applicable minor NSR thresholds listed below for ANY of the pollutants listed in the table below? The potential emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html. Be sure to include all new and modified emission units at your facility.

Pollutant	Attainment Area	Nonattainment Area
СО	10 tpy	5 tpy
PM	10 tpy	5 tpy
PM ₁₀	5 tpy	1 tpy
PM _{2.5}	3 tpy	0.6 tpy
SO ₂	10 tpy	5 tpy
NO _X	10 tpy	5 tpy
VOC	5 tpy	2 tpy

Yes	No
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If you answered 'No,' your source is exempt from the minor NSR program. Please contact your reviewing authority to confirm that your facility will not need a permit. If you answered 'Yes,' continue on to the next question.

4. If located in a nonattainment area for any pollutant, will the PTE of your facility for the particular nonattainment pollutant be less than the NSR major source thresholds specified in the table below (based on nonattainment classification)? The emissions from your facility may be calculated using the PTE calculator provided at http://www.epa.gov/air/tribal/tribalnsr.html. Be sure to include all existing, new, and modified emission units at your facility.

Pollutant	Nonattainment Classification	NSR Major Source Threshold
Ozone	Marginal	100 tpy of VOC or NO _X
	Moderate	100 tpy of VOC or NO _X
	Serious	50 tpy of VOC or NO _X
	Severe	25 tpy of VOC or NO _X
	Extreme	10 tpy of VOC or NO _X
PM ₁₀	Moderate	100 tpy
	Serious	70 tpy
СО	Moderate	100 tpy
	Serious	50 tpy
SO ₂ , NO ₂ , PM _{2.5}	No nonattainment classification	100 tpy

Yes	☐ No	■ Not Applicable
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If you answered 'No,' your source does not qualify for the General Permit. Please contact your reviewing authority to apply for a site-specific permit. If you answered 'Yes,' continue on to Part 2 of this Questionnaire. A synthetic minor source that agrees to the enforceable conditions in the General Permit and is below the thresholds above should answer 'Yes.'

Part 2: Does my Facility Qualify for Coverage under the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities?

The following questions are meant to determine whether or not your sawmill facility would qualify for coverage under the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities.

1.	After completion, will your new or modified source have emergency generator engines with a combined maximum engine power less than 1,000 horsepower (hp), if in an attainment area, or 500 hp, if in an ozone nonattainment area classified marginal, moderate, or serious; or will have not emergency generator engines, if in a severe or extreme ozone nonattainment area? (All emergency engines must be emergency generator engines used solely for supplying electrical power during power outages.)
	☐ Yes ☐ No
2.	Is your facility located in a marginal/moderate/serious/severe/extreme ozone nonattainment area and, after the proposed construction or modification project, are your facility's annual VOC emissions from kiln drying and surface coating operations (as calculated) projected to be less than 80/80/40/20/8 tons over any consecutive 12-month period, respectively?
	Yes No Not Applicable
3.	Is your facility located in an ozone attainment, unclassifiable, or attainment/unclassifiable area and, after the proposed construction or modification project, your facility's annual VOC emissions from kiln drying and surface coating operations (as calculated) projected to be less than 80 tons over any consecutive 12-month period?
	Yes No Not Applicable
4.	After the proposed construction or modification project, will your facility process less than 110,000 tons of logs per consecutive 12-month period if in a serious PM_{10} nonattainment area or a $PM_{2.5}$ nonattainment area, or less than 175,000 tons of logs per consecutive 12-month period in any other area?
	☐ Yes ☐ No
5.	If seeking a synthetic minor limit to avoid being a major source for HAP emissions, are total HAP emissions 17.5 tpy or less and, for a single HAP, are HAP emissions 8 tpy or less?
	☐ Yes ☐ No
6.	Will your facility only treat or process wood through drying wood in a kiln? (That is, your facility does not chemically treat or process wood for wood preservation or the production of composite wood products.)
	☐ Yes ☐ No

7.	If located in an ozone attainment, unclassifiable, attainment/unclassifiable area or marginal, moderate, or serious ozone nonattainment area, is the total maximum heat input capacity of all the combustion units less than 30 million British thermal units (MMBtu)/hour (hr), excluding gaseous- or liquid-fueled auxiliary heaters?
	Yes No Not Applicable
8.	If located in an ozone attainment, unclassifiable, attainment/unclassifiable area or marginal, moderate, or serious ozone nonattainment area, is the total maximum heat input capacity of all gaseous- or liquid-fueled auxiliary heaters less than 10 MMBtu/hr?
	Yes No Not Applicable
9.	If located in a severe or extreme ozone nonattainment area, is the total maximum heat input capacity of all the combustion units less than 50 MMBtu/hr in a severe area or less than 20 MMBtu/hr in an extreme area?
	Yes No Not Applicable
10.	If located in a severe or extreme ozone nonattainment area are all boilers and auxiliary heaters natural gas- fired?
	Yes No Not Applicable
11.	Will your planer mill operation be conducted within an enclosed structure?
	Yes No Not Applicable
12.	Will all planer mill operations venting to the atmosphere be controlled by a baghouse (or fabric filters)?
	Yes No Not Applicable
13.	Will all outdoor sawmill operations be covered and all drop points controlled by a cyclone or baghouse?
	Yes No Not Applicable
14.	Will all indoor sawmill operations venting to the atmosphere be controlled by a baghouse (or fabric filters)?
	Yes No Not Applicable
15.	Do you intend to satisfy the procedures for threatened or endangered species and historic properties according to the processes provided by the EPA for this General Permit?
	☐ Yes ☐ No

Conclusion

If you answered 'Yes' or 'Not Applicable' to each of the questions in Part 3, you may qualify for coverage under the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities. If you believe, based upon your answers in this questionnaire, that your new or modified sawmill facility qualifies for the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities, please submit a request for Coverage Form to your reviewing authority.

If you answered 'No' to any of these questions, your facility may not qualify for coverage under the General Air Quality Permit for New or Modified Minor Source Sawmill Facilities. Please contact your reviewing authority to confirm that your facility will not qualify for this General Permit.