Permit Number: R10T5130000
Issued: July 27, 2023

Effective: August 28, 2023
Expiration: July 26, 2028

United States Environmental Protection Agency
Region 10
Air & Radiation Division
1200 Sixth Avenue, Suite 155, 15-H13
Seattle, Washington 98101

Statement of Basis

Part 71 Title V Permit to Operate for
Pace International, LLC
Permit No. R10T5130000

The purpose of this document is to set forth the legal and factual basis for permit conditions, including references to applicable provisions of the Clean Air Act (CAA or Act) and implementing regulations. This document also gives the derivation of conditions as required by 40 CFR 71.11(b).

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Abbreviations, Acronyms and Symbols

Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. § 7401, *et seq*.]
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CMPU	Chemical Manufacturing Process Unit
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
EPA	U.S. Environmental Protection Agency, Region #
ESA	Endangered Species Act
FWS	Fish and Wildlife Service
dscf	Dry standard cubic feet
EJ	Environmental Justice
EU	Emission Unit
FARR	Federal Air Rules for Reservations
gr/dscf	grain per dry standard cubic foot (7,000 grains = 1 pound)
HAP	Hazardous Air Pollutant
hr	hour
HP	horsepower
ICE	internal combustion engine
ID	Identification
IEU	Insignificant Emission Unit
kg	kilogram
kW	kilowatt
kPa	kilopascal
lb	pound
LPG	liquified petroleum gas
MACT	Maximum Achievable Control Technology
mmBtu	Million British Thermal Units
MVAC	Motor Vehicle Air Conditioning
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 micrometers in diameter
$PM_{2.5}$	Particulate Matter less than 2.5 micrometers in diameter
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
PWW	Process Waste Water
SI	spark ignition

SO_2	Sulfur Dioxide
tpy	Tons per year
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
yr	Year

1. EPA Authority to Issue Part 71 Permits

All major stationary sources of air pollution and certain other sources are required to apply for title V operating permits that include emission limitations and other conditions as necessary to assure compliance with applicable requirements of the Clean Air Act (CAA or Act), including the requirements of the applicable State Implementation Plan (SIP). CAA sections 502(a) and 504(a). The title V operating permit program does not generally impose new substantive air quality control requirements (referred to as "applicable requirements"), but does require permits to contain monitoring, recordkeeping, reporting and other requirements to assure source compliance with applicable requirements. 57 Fed. Reg. 32250, 32251 (July 21, 1992).

One purpose of the title V program is to "enable the source, States, EPA, and the public to understand better the requirements to which the source is subject, and whether the source is meeting those requirements." 57 Fed. Reg. at 32251. Thus, the title V operating permit program is a vehicle for ensuring that air quality control requirements are appropriately applied to the source emission units and for assuring compliance with such requirements.

The Administrator will administer and enforce an operating permits program in Indian country, as defined in 40 CFR 71.2, when an operating permits program which meets the requirements of part 70 of this chapter has not been explicitly granted full or interim approval by the Administrator for Indian country.

2. Facility Information and Description

Facility Information

Parent Company:	Pace International, LLC or Valent BioSciences Corporation 1910 Innovation Wy Suite 100 Libertyville, IL 60048
Facility:	Pace International, LLC 5661 Branch Road Wapato, WA 98951
Facility Contact:	Christine Heintzman, Sr. Manager of Operations Pace International, LLC 5661 Branch Road Wapato, WA 98951 Phone: (925) 357-6781 e-mail: Christine.heintzman@paceint.com
Owner/Operator:	Pace International, LLC 5661 Branch Road Wapato, WA 98951

Tribe: Yakama Nation

Reservation: Yakama Reservation

SIC/NAICS Code: 2899/115114

Facility Description

Pace International, LLC (Pace) is located at 5661 Branch Road, Wapato, Washington, and is within the Yakama Reservation boundaries. Pace produces cleaners, fungicides, drench and coatings and diphenylamine (Diphenylamine (DPA)) is a plant growth regulator used post-harvest to control storage scald on apples) for agricultural products. These are post-harvest coatings manufactured in a batch process. Batches vary in raw materials and sizes from 55 to 5,000 gallons. Pace also formulates products that protect crops from sun and rain damage. Many of the formulations are made with natural ingredients. Of these products, ShieldBrite chemicals are produced at the highest volume. None of the compounds that Pace produces are polymers. Pace also purchases and resells sanitizers without repacking.

The process takes place in various units throughout the facility including storage tanks, mixing tanks, sediment ponds, laboratory activities and other miscellaneous evaporative sources.

Volatile Organic Compounds (VOCs) are used in making these post-harvest coating products. The emissions are exhausted through multiple roof vents.

The process wastewater (PWW) drains to a PWW vault through trenches. The vault is covered and has two stacks with inline fans that draw ventilation air through the trenches. PWW is generated by laboratory operations, storage and process tanks, cleaning and container rinsing. PWW is pumped to one of the aerated solar evaporation ponds. Solids are periodically removed and managed as solid waste.

Two propane fuel fired emergency generators provide backup power to critical laboratory instrumentation and the computer server room.

The air pollution emission units and control devices that exist at the facility are listed in Table 2.1 below by emission unit identification (EU ID). Those control devices that are required by rule or this permit are so noted.

Table 2.1 – Emission Units

EU ID	Description	Control Equipment
EU-1	B8 Boiler. 31.7 mmBtu/hr capacity propane fired boiler installed in 2016.	None
EU-2a	25 kW propane fired Emergency Generator	None
EU-2b	50 kW propane fired Emergency Generator	None
EU-3	Post-Harvest Coating Production Process. The process takes place in various units throughout the facility and include storage tanks, mixing tanks, sediment ponds, lab activities and other miscellaneous evaporative sources.	None

EU ID	Description	Control Equipment
EU-4	Fogging Room. For fogging chemical testing. The gaseous fogging chemicals are ducted to a propane-fired afterburner that combusts the chemicals before release to the atmosphere.	Afterburner[1]
EU-5	Wastewater Sump. Collects wastewater from drain trenches in the manufacturing building. Exhaust fans above the sump draw air through the trenches and help ventilate the building. Fans operate continuously during manufacturing and, therefore, draw vapor emissions from the sump liquid in at a steady rate. The collected wastewater is routed to the evaporation/sediment ponds.	None

Insignificant activities that meet the criteria in 40 CFR 71.5(c)(11) have a PTE of less than 2 tpy of any regulated air pollutant or fall within categorical definitions. The insignificant activities at the Pace facility and the reason each qualifies as an insignificant emission unit are presented in Table 2.2.

Table 2.2 – Insignificant Activities

Insignificant Emission Units	Reason
Hot Box – Electrically heated process heater used to physically reduce the viscosity of various liquids	The temperature range of the electrically heated process heater is room temperature to 300^0F. VOCs are not accounted for due to high vapor pressure of the liquids heated in the hot box.
Mobile sources; air conditioning units for human comfort; ventilating units for human comfort; heating units for human comfort; noncommercial food preparation; consumer use of office equipment and products; janitorial services and consumer use of janitorial products; internal combustion engines used for landscaping purposes	Insignificant based on the definition in 40 CFR 71.5(c)(11)(i)

Tribal Reservation

The Yakama Reservation is in central Washington. The Pace facility is located on the Yakama Reservation in south central Washington. The reservation was established by the Treaty of June 9, 1855 (12 Stat. 951), by which The Confederated Tribes and Bands of the Yakama Nation ceded to the United States their aboriginal title to approximately 10 million acres in central Washington and reserved for their own use forever the Yakama Reservation. The Yakama Nation is composed of 14 Tribes and Bands: Kah-milt-pah, Klickitat, Klinquit, Kow-was-say-ee, Li-ay-was, Oche-chotes, Palouse, Pisquose, Se-ap-cat, Shyiks, Skinpa, Wenatshapam, Wishram and Yakama. The 1.4 million acre reservation is primarily in Yakima County with some land in

[1] The permit does not require Permittee to operate the afterburner.

Klickitat and Lewis Counties. The reservation is considered to be Indian country, as defined in 40 CFR part 71.

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Area Classification

South central Washington, including the Yakama Reservation, either attains the national ambient air quality standard for all criteria pollutants or is unclassified. An area is unclassifiable when there is insufficient monitoring data. Ambient PM10 and PM2.5 data are currently being collected at a monitoring location in the city of Yakima. Ambient PM2.5 data are also being collected at monitoring locations in White Swan, Toppenish and Sunnyside, but these data are non-regulatory. Until about 2005, ambient CO data were collected at a monitoring site in Yakima. The area experiences high ambient fine particulate matter (PM2.5) levels, approaching and at times exceeding the ambient standard of 35 micrograms per cubic meter ($\mu g/m^3$), caused primarily by wood stove use during wintertime inversions. During the road construction season (March through November), with the exception of wildfire events, daily PM2.5 levels measured in Wapato and Yakama, the nearest monitoring locations, rarely exceed 20 $\mu g/m^3$ and are typically around 10 $\mu g/m^3$or less. The area is currently considered to be in attainment for PM10, PM2.5 and CO. The area is unclassified for all other pollutants.

Oregon and Washington are either contiguous with the Yakama Nation or within 50 miles of the facility. Therefore, each is an affected State that must be notified of this title V draft permit action pursuant to 40 CFR 71.8(a). See definitions of "affected State" and "State" in 40 CFR 71.2 along with EPA December 9, 1999, guidance[2].

Single Source Determination

Historically, the Pace plant consisted of two operations located approximately one mile apart in Wapato, Washington, on the Yakama Reservation. The main facility referenced in this statement of basis is located at 5661 Branch Road (Latitude 46.405, Longitude 120.458). The Cascade facility covered under the non-title V permit R10NT500200 issued on December 12, 2006, is no longer part of the stationary source. Pace divested itself of the Cascade facility in December 2012. Hence, no single source determination is necessary for this permit.

Title V Major Source Status

The post-harvest coatings manufactured at Pace releases VOC and a small amount of HAP. As explained in the next section of the statement of basis, the facility's VOC PTE would exceed the title V major source threshold but for a non-title V synthetic minor source permit issued in 2006. The facility will become a title V major source when Region 10 rescinds the 2006 permit. The

[2] https://www.epa.gov/sites/default/files/2015-08/documents/r9memsig.pdf

2006 permit will be rescinded when Region 10's final action on Pace's title V application becomes effective.

Permitting, Construction and Compliance History

Pace currently operates under non-title V permit R10NT500200, issued by EPA Region 10 on December 4, 2006. This permit includes synthetic minor limits and mass balance recordkeeping requirements for VOC and HAP intended to keep the facility's PTE below the title V major source thresholds in 40 CFR part 71. The B6 and B7 boilers covered under the non-title V permit R10NT500200 were removed from the facility in 2016 and replaced with the B8 boiler. Pace provided emissions-related information in an NSR applicability determination request filed on June 19, 2017.

On April 3, 2019, Pace submitted a synthetic minor source permit application pursuant to 40 CFR 49.158(c)(1) to account for new emission-generating equipment installed since initial non-title V permit issuance in 2006. Pace intended for the synthetic minor source permit (that it applied for in 2019) to replace the 2006 synthetic minor source permit. But after discussing with Region 10 the recordkeeping requirements associated with the synthetic minor source permit (that it applied for in 2019), Pace decided to withdraw its 2019 synthetic minor source permit application and instead apply for a title V operating permit. The following table summarizes activity associated with the title V permit application:

Table 2.3 – TITLE

Date	Part 71 Permit Application Activity
October 23, 2020	Application receipt.
January 28, 2021	Receipt of additional information.
February 9, 2021	Region 10 determined the application to be complete.
February 02, 2023	Region 10 shares pre-draft permit with Yakama Nation and Permittee
	Public comment period for draft permit action begins.
	Public comment period is scheduled to close.

3. Emission Inventory

Emission Inventory Basics

An emission inventory generally reflects either the "actual" or "potential" emissions from a source. Actual emissions generally represent a specific period of time and are based on actual operation and controls. Potential emissions, referred to as potential to emit (PTE), generally represent the maximum capacity of a source to emit a pollutant under its physical and operational design, taking into consideration regulatory restrictions, but only required control devices. PTE is often used to determine applicability to several EPA programs, including title V, PSD and section 112 (MACT).

Emissions can be broken into two categories: point and fugitive. Fugitive emissions are those which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening. Examples of fugitive emissions are roads, piles that are not normally enclosed, windblown dust from open areas, and those activities that are normally performed outside buildings. Point sources of emissions include any emissions that are not fugitive. To estimate

actual emission, the permittee will need to track the actual operational rates. Note that emission factors may be improved over time.

The equation below represents the general technique for estimating emissions (in tons per year) from each emission unit at the facility. Emissions are calculated by multiplying an emission factor by an operational parameter. To estimate actual emission, the permittee will need to track the actual operational rates. Note that emission factors may be improved over time. For those estimation techniques that require substantial site-specific parameter tracking, such as piles and roads, emissions associated with a defined operational rate can be estimated to establish a set ratio that can be used to multiply by the actual operational rate in future years, significantly simplifying the annual inventory effort. All the techniques and site-specific parameters and assumptions should be reviewed each year before estimating emissions to be sure they remain appropriate.

$$E = EF \times OP \times K$$

Where:

E = pollutant emissions in tons/year
EF = emission factor (see Appendix A)
OP = operational rate (or capacity for PTE)
K = 1 ton/2000 lbs for conversion from pounds per year to tons per year

Potential to Emit (PTE)

The PTE estimates for the facility generally assume all units operate 8760 hours per year. The PTE is above the title V operating permit major source threshold of 100 tons per year for VOC. For the post-harvest coating production process, VOC and HAP emissions are estimated based on the emission factors developed from a conservative facility wide mass balance, using actual emission data from past years. Pace has developed conservative emission factors relating VOC and HAP emissions to the process. These emission factors are used to estimate the PTE of VOC and HAP from the production process. The production process in 2019 had a small amount of HAP due to laboratory activities. For years 2010 - 2019, 1.66 tpy was the greatest annual emissions of total combined HAP from the production process. This occurred in 2014, and the 2014 actual emission factor was 0.0023 lb/gallon for total combined HAP from the production process.

Emissions from the B8 boiler are calculated using a combination of AP-42 emission factors and vendor emission data. The PTE assumes 8,760 hours of operation and firing at the maximum heat input listed for the boiler. Pace operates an enclosed fogging system to test fogging chemicals produced onsite and fogging chemical application equipment. Approximately 618 kg of fogging chemicals are tested annually. The chemicals begin as a liquid fogging agent, then, are aerosolized and sprayed onto food items or objects in the enclosure. PTE calculations assume that 100% of the fogging chemicals remain in the vapor exhaust and are emitted to the atmosphere.

The gaseous fogging chemicals are ducted to a propane-fired afterburner that combusts the chemicals before release to the atmosphere. A packed bed wet scrubber is attached to the afterburner and provides a quench barrier between the process and the afterburner. The scrubber does not contribute pollutants of any kind relevant to calculating potential emissions from the

fogging enclosure and afterburner. Additionally, since there is currently no underlying regulatory requirement for Pace to operate the afterburner, the control the afterburner provides is not accounted for in PTE calculations. The PTE accounts for both the emissions from propane combustion from the afterburner and uncontrolled VOC emissions from the fogging chemical testing.

Pace's PTE, categorized by emission unit, is summarized in Table 3.1. The processes/operations listed in Table 3.1 generate only non-fugitive emissions. Fugitive emissions (e.g., those generated by wastewater treatment in the facility's outdoor ponds) are not listed in Table 3.1 because they do not count toward title V applicability. The facility is not among the 27 listed source categories in 40 CFR 71.2's definition of "major source" for which fugitive emissions count toward title V applicability. For EU-specific PTE calculations see Tables A.1, A.2, A.3, A.4, A.5 and A.6 in Appendix A to the statement of basis.

Table 3.1 – Total Facility Wide Potential to Emit

Process/Operations	Emissions (tons/year)					
	$PM/PM_{10}/PM_{2.5}$	**SO_2**	**NO_X**	**VOC**	**CO**	**HAP[4]**
Post-Harvest Coatings[1]	--	--	--	180.0	--	6.0
Fogging Chemicals	0.05	1.44E-03	0.93	7.51	0.54	Negligible
Wastewater Sump[2]	--	--	--	1.7	--	0.06
Boiler B8[3]	1.06	0.15	14.62	1.15	5.30	--
Emergency Generators	2.60E-03	1.61E-04	6.22E-01	8.12E-03	9.62E-01	8.89E-03
Totals	1.08	0.15	15.43	190.31	6.37	6.07
Title V applicability Threshold	100	100	100	100	100	10

[1] Totals for the post-harvest coatings production process are based on historic actual emissions and production rates and increased these rates to be conservative. Actual emissions from this process are expected to be much lower than this potential emission rate.
[2] The HAP total for the wastewater sump is estimated by assuming that all HAP and VOC originate from the post-harvest coatings production process. Wastewater sump VOC is calculated as addressed in Table A.4, and the ratio of HAP/VOC for the production process is used to estimate the HAP emissions from the wastewater sump.
[3] PM emission factors are not listed in AP-42 for Boiler B8 and are being assumed equal to those listed for PM_{10} and $PM_{2.5}$.
[4] The PTE shown is emissions of all HAP species combined. Emission rates for individual HAP are less than or equal to the PTE shown for combined HAP. Due to the low HAP totals for the facility, only the threshold for individual HAP is shown. The threshold for total facility HAP is 25 tons/year.

4. Regulatory Analysis

EPA is required by 40 CFR part 71 to include in this title V permit all emission limitations and standards that apply to the facility, including operational, monitoring, testing, recordkeeping and

reporting requirements necessary to assure compliance. This section explains which air quality regulations apply to the facility and how these regulations are addressed in the permit.

Located within Indian country, the facility is subject to federal air quality regulations, but is not subject to state air quality regulations. EPA does not consider any permits issued by Yakama Regional Clean Air Agency for this facility to be applicable requirements. The facility could be subject to tribal air quality regulations; however, the Yakama Nation has not gone through the process of obtaining authorization to be treated in the same manner as states under 40 CFR 49.6 and 49.7 (Tribal Authority Rule) and obtaining approval of air quality regulations as a "Tribal Implementation Plan." Therefore, Tribal air quality regulations, if any, are not federally enforceable and do not meet the definition of "applicable requirement" under 40 CFR part 71. As such, there are no Tribal air quality regulations in this title V permit.

EPA relied on information provided in the permittee's title V permit application and on supplementary information provided by the permittee to determine the requirements that are applicable to the facility. Future modification to the facility could result in additional requirements applying.

Federal Air Quality Requirements

Title V Operating Permit Program. Title V of the CAA and the implementing regulation found in 40 CFR part 71 require major sources (as well as a selection of non-major sources) of air pollution to obtain operating permits and form the legal bases for this permit. A source is major for title V purposes if it has the potential to emit 100 tons per year or more of any air pollutant subject to regulation, 25 tons per year or more of hazardous air pollutants (totaled) or 10 tons per year or more of any single hazardous air pollutant (see 40 CFR 71.2). Pace's facility is a major source subject to Title V because it has the potential to emit more than 100 tons per year of VOC not counting fugitive emissions.

The title V operating permit serves as a comprehensive compilation of the air quality requirements that are applicable to a source. The permit also must assure compliance, so source-specific testing, monitoring, recordkeeping and reporting have been added where the EPA believes it is necessary, as explained in Section 4.3 (Permit Conditions) of this statement of basis below.

Prevention of Significant Deterioration (PSD). Under the PSD pre-construction permitting program found in Part C of the Clean Air Act and 40 CFR 52.21, no "major stationary source" or "major modification" to a major stationary source can begin actual construction without first obtaining a PSD permit. The PSD program has been changed over the years, but in general, a major stationary source for purposes of the PSD program is a source with a PTE of more than 250 tons per year of any PSD pollutant. Based upon information available today and the calculations presented in Attachment A, the facility is not a major source for PSD. The PTE of all NSR regulated pollutants is less than 250 tpy. As new information becomes available regarding emission factors and the source's operating capacity, EPA's estimation of PTE may change.

A modification to an existing minor source is major (and subject to review) if it results in emission increases that equal or exceed the 250 tpy major source threshold. Historical reviews of potential PSD projects are difficult due to the lack of specific details about the sources, their emissions and the various applicability requirements in previous PSD programs. Based on the

information available today, EPA is not aware of any modifications that would have been subject to PSD. EPA is not aware of any other modifications to the facility and does not draw any conclusions regarding compliance with past permitting requirements for this facility. Therefore, no permit shield is implied or explicit for past new source review or PSD requirements.

New Source Performance Standards (NSPS). Three NSPS may apply to operations at the Pace facility as explained in the following analysis.

The boiler is not subject to 40 CFR part 60, subparts D and Da because the boiler has a heat input capacity less than 250 mmBtu/hr. It is not subject to subpart Db because the boiler has a heat input capacity less than 100 mmBtu/hr. The B8 boiler is rated at 31.7 mmBtu/hr, well below the size cut off for each of those subparts. B8 boiler is subject to subpart Dc which applies to boilers built after June 9, 1989, that burn propane (propane meets the definition of natural gas in 60.41c) with a heat input capacity greater than 10 mmBtu/hr. NSPS subpart Dc requirements that do not apply to the Pace facility are not included in the permit; requirements that apply but are either not emissions limitations or standards, or operational requirements and limitations that are necessary to assure compliance with all applicable requirements are also not included in the permit. Table B.1 in Appendix B explains whether specific requirements of subpart Dc apply to the boiler and where the requirements are located in the permit.

40 CFR part 60 subpart Kb - Standards of Performance for Volatile Organic Liquid (VOL) storage vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Pace has several VOL storage vessels on site. Pursuant to 40 CFR 60.110b(a) and (b), subpart Kb applies to vessels with volume greater than 75 m^3 (19,813 gallons) with a maximum true vapor pressure greater than 15 kPa; or volume greater than 151 m^3 (19,813 gallons) with a maximum vapor pressure greater than 3.5 kPa. The largest tank onsite has a nominal capacity of 20,000 gallons and contains a mixture of citric acid, water and traces of other compounds. Pure citric acid has a minimal partial vapor pressure in water solution. Therefore, this tank is not subject to subpart Kb requirements. All other tanks at pace have a volume less than 75 m^3, therefore no tanks at the facility are subject to subpart Kb.

40 CFR part 60 subpart JJJJ - Standard of Performance for Stationary Spark Ignition Internal Combustion Engines. The propane fired emergency generators at Pace are rated at 25 and 50 kW. Subpart JJJJ applies to owners and operators of stationary spark ignition engines (SI ICE) for which construction commenced after June 12, 2006, and that are manufactured on or after January 01, 2009, for emergency engines with a maximum power greater than 19 kW, pursuant 40 CFR 60.4230(a)(4)(iv). The 25 kW unit was installed at the facility in 2007 and has not been subsequently modified or reconstructed. The 25 kW unit was manufactured prior to January 01, 2009, therefore, the provisions of NSPS subpart JJJJ are not applicable to the 25 kW unit. The 50 kW unit was installed in 2013, manufactured after 2009, is subject to 40 CFR 60 subpart JJJJ pursuant to 40 CFR 60.4230(a)(4)(iv). The applicable requirements include emission standards per 40 CFR 60.4233(c); Monitoring hours of operation per 40 CFR 60.4237(c); Certification, Operation and Maintenance requirements and Recordkeeping per 40 CFR 60.4243(d); Notification, Reporting and recordkeeping requirements per 40 CFR 60.4245(a) and (b). Table B.2 in Appendix B explains whether specific requirements of subpart JJJJ apply to the engine and where the requirements are located in the permit.

Because 40 CFR part 60, subpart Dc applies to the boiler, and 40 CFR part 60 subpart JJJJ applies to the 50 kW engine, subpart A of part 60 also applies, as explained in 40 CFR 60.1(a). NSPS subpart A requirements that do not apply to the Pace facility are not included in the permit; requirements that apply but are either not emissions limitations or standards, or operational requirements and limitations that are necessary to assure compliance with all applicable requirements are also not included in the permit. Table B.3 in Appendix B explains whether specific requirements of Subpart A apply to the boilers and where the requirements are located in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP). Several NESHAP may apply to operations at the Pace facility as explained in the following analysis.

40 CFR part 63 subparts F and G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subparts F and G, pursuant to 40 CFR 63.100(a) and (b)(3).

40 CFR part 63 subparts H and I - National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks. Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subparts H and I, pursuant to 40 CFR 63.190(b).

40 CFR part 63 subpart YY - National Emission Standards for Organic Hazardous Air Pollutants for Source Categories: Generic Maximum Achievable Control Technology Standards. Pace does not conduct any of the activities listed in Table 1 of 40 CFR 63.1100(a) and is, therefore, not subject to 40 CFR part 63 Subpart YY.

40 CFR part 63 subpart EEEE - National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non Gasoline). Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subpart EEEE, pursuant to 40 CFR 63.2334(a).

40 CFR part 63 Subpart FFFF - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing. Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subpart FFFF, pursuant to 40 CFR 63.2435(a).

40 CFR part 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The propane fired emergency generators at Pace are considered new sources pursuant to 40 CFR 63.6585 and 63.6590(2)(iii). Since the construction of each commenced after June 12, 2006, and Pace is an area source of HAP pursuant to 40 CFR 63.6590(c), the only applicable requirement under 40 CFR part 63 subpart ZZZZ is to comply with 40 CFR part 60 subpart JJJJ as applicable. 40 CFR part 60 subpart JJJJ applicability is explained earlier. Table B.4 in Appendix B explains the specific requirement of Subpart ZZZZ that applies to the engines.

40 CFR part 63 subpart HHHHH - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing. Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subpart HHHHH, pursuant to 40 CFR 63.7985(a)(1).

40 CFR part 63 subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters. Pace is not a major source of HAP and is, therefore, not subject to 40 CFR part 63 subpart DDDDD, pursuant to 40 CFR 63.2485.

40 CFR 63 subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers for Area Sources. Pace is an area source for HAP. However, the boiler only combusts propane, and is, therefore, not subject to 40 CFR part 63, subpart JJJJJJ, pursuant to 40 CFR 63.11195(e).

40 CFR part 63 subpart VVVVVV - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources. Pace is an area source of HAP. Pursuant to 40 CFR 63.11494(a)(2), subpart VVVVVV applies to facilities with a chemical manufacturing process unit (CMPU) that contains a HAP listed in Table 1 of the subpart. Pace does not have any Table 1 HAPs present in any CMPU onsite and anticipates that none will ever be present. However, Table 1 HAP may be present in small quantities in the onsite laboratory. The laboratory activities are not subject to the subpart, however, because quality assurance / quality control laboratories and ancillary activities as defined in 40 CFR 63.11502(b) are exempted pursuant to 40 CFR 63.11494(c)(4) and (5), respectively.

40 CFR part 63 subpart BBBBBBB – National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry. According to 40 CFR 63.11579(a), you are subject to the subpart if you own or operate a chemical preparations facility, are located at an area source of HAP and have at least one chemical preparations operation in target HAP service. As specified in 40 CFR 63.11588, the target HAP are metal compounds for chromium, lead, manganese and nickel. Pace does not use any target HAP-containing products and, therefore, is not subject to 40 CFR 63 Subpart BBBBBBB.

<u>EPA Region 10 Federal Air Rules for Reservations (FARR)</u>. Federal Air Rules for Reservations in Idaho, Oregon and Washington are codified in 40 CFR 49.121 through 49.139. The subset of these regulations that apply on the Yakama Reservation in Washington are identified in 40 CFR 49.11106. FARR regulations place limits on visible emissions, PM emissions, sulfur content of fuels, and other sources of emissions.

40 CFR 49.124 - Rule for limiting visible emissions: The visible emissions from an air pollution source must not exceed 20% opacity, averaged over any consecutive six-minute period. EPA Method 9 is used for determining compliance. Ongoing compliance will be maintained by conducting monthly walkthroughs of the facility to identify and address sources of visible emissions.

40 CFR 49.125 - Rule for limiting the emissions of particulate matter: Particulate matter emissions from a combustion source stack or process source stack must not exceed an average of 0.23 grams per dry standard cubic meter (0.1 grains per dry standard cubic foot), corrected to seven percent oxygen for a combustion source stack, during any three-hour period. EPA Method 5 is used for determining compliance. Ongoing compliance will be maintained by conducting monthly walkthroughs of the facility to identify and address sources of visible emissions.

40 CFR 49.126 - Rule for limiting fugitive particulate matter emissions. The owner or operator of any source of fugitive particulate matter emissions, including any source or activity engaged in materials handling or storage, construction, demolition, or any other operation that is or may be a source of fugitive particulate matter emissions, must take all reasonable precautions to prevent fugitive particulate matter emissions and must maintain and operate the source to minimize fugitive particulate matter emissions. Ongoing compliance will be maintained by

conducting monthly walkthroughs of the facility to identify and address sources of fugitive particulate matter emissions.

40 CFR 49.129 - Rule for limiting emissions of sulfur dioxide. Sulfur dioxide emissions from a combustion or process source stack must not exceed an average of 500 parts per million by volume, on a dry basis and corrected to seven percent oxygen for a combustion source stack, during any three-hour period. EPA Methods 6, 6A, 6B, and 6C are used for determining compliance. Ongoing compliance is maintained by using fuels compliant with applicable sulfur. Limits in fuels, and these fuels being the only fuels combusted in regulated emission sources at the facility.

40 CFR 49.130 - Rule for limiting sulfur in fuels: For gaseous fuels, 1.1 grams of sulfur per dry standard cubic meter of gaseous fuel (400 parts per million at standard conditions). ASTM methods D1072-90(Reapproved 1999), D3246-96, D4084-94 (Reapproved 1999), D5504-01, D4468-85 (Reapproved 2000), D2622-03, and D6228-98 (Reapproved 2003) are used for determining compliance. Ongoing compliance will be maintained by verifying fuel sulfur content supplied by the propane vendor.

40 CFR 49.131 - General rule for open burning. The rule is applicable.

40 CFR 49.135 - Rule for emissions detrimental to public health or welfare: A person must not cause or allow the emission of any air pollutants from an air pollution source, in sufficient quantities and of such characteristic and duration, that the Regional Administrator determines causes or contributes to a violation of any national ambient air quality standard; or is presenting an imminent and substantial endangerment to public health or welfare, or the environment. Compliance with applicable emission limits assures compliance with this limit.

40 CFR 49.137 - Rule for air pollution episodes: Owners or operators of any air pollution source may volunteer or may be required to curtail or eliminate air emissions during the declaration of an applicable air pollution action level trigger. Ongoing compliance will be maintained by curtailing or eliminating air emissions during applicable air pollution action levels as directed by the Regional Administrator.

40 CFR 49.138 - Rule for the registration of air pollution sources and the reporting of emissions: Part 71 (title V) sources must submit an annual registration that includes a facility description, emissions estimation methodology, annual emissions estimate, and fee calculation worksheet. Ongoing compliance will be maintained by submitting annual reports containing applicable information and fees.

<u>Stratospheric Ozone and Climate Protection - 40 CFR part 82 subpart F</u>. This subpart requires persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" is defined at 40 CFR 82.152). Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156. Owners/operators of appliances normally containing 50 or more pounds of refrigerant

must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

Pace does not knowingly vent or otherwise release into the environment any refrigerants other than potential de minimis releases as defined in 40 CFR 82.154(a)(2). Pace contracts certified technicians to handle all maintenance, service, repair, and disposal of refrigerants and appliances that contain refrigerants. Pace does not manufacture, sell, or import any appliances, refrigerants, or one-time expansion devices as defined in part 82.

Mandatory Greenhouse Gas Reporting Rule. This rule requires sources above certain emission thresholds to calculate, monitor, and report greenhouse gas emissions. According to the definition of "applicable requirement" in 40 CFR 71.2, neither 40 CFR part 98, nor CAA 307(d)(1)(V), the CAA authority under which 40 CFR part 98 was promulgated, are listed as applicable requirements for the purpose of title V permitting. Although the rule is not an applicable requirement under 40 CFR part 71, the permittee is not relieved from the requirement to comply with the rule separately from compliance with their part 71 operating permit. It is the responsibility of each permittee to determine applicability to part 98 and to comply, if necessary.

Acid Rain Program. Title IV of the CAA created a SO_2 and NO_X reduction program found in 40 CFR part 72. The program applies to any facility that includes one or more “affected units” that produce power. The B8 boiler is not a “unit” as defined in 40 CFR 72.2 because it does not produce power and is not large enough to be subject to the acid rain program in part 72.

CAA Sections 111(d) and 129. There are no CAA, Section 111(d) or 129 regulations that apply to the type of emission units at the facility. Propane combustion in the boiler is not considered solid waste or municipal waste combustion or incineration.

Compliance Assurance Monitoring (CAM). CAM applies to emission units that are subject to an emission limit with a pre-control potential to emit emissions equal to or greater than the major source threshold defined in title V (generally, 100 tons per year) and that use a control device to comply with the limit (see 40 CFR part 64).

Although Pace is major source for VOC emissions, it does not currently operate any emission control devices to achieve compliance with any emission limitation or standard. Therefore, Pace is not required to submit a CAM plan at this time.

Chemical Accident Prevention Program - 40 CFR part 68. This program requires sources that use or store regulated substances above a certain threshold to develop plans to prevent accidental releases. Based on information in their application, there are no regulated substances above the threshold quantities in this rule at this facility; therefore, the facility is not currently subject to the requirement to develop and submit a risk management plan. However, this requirement is included in the permit as an applicable requirement because the permittee has an ongoing responsibility to submit a risk management plan if a listed substance exists at the facility in quantities over the threshold amount, or if the quantity of any regulated substance ever increases above the threshold quantity. Including this term in the permit minimizes the need to reopen the permit if the facility becomes subject to the requirement to submit a risk management plan.

Other Federal Requirements

EPA Trust Responsibility. As part of the EPA Region 10’s direct federal implementation and oversight responsibilities, Region 10 has a trust responsibility to each of the 271 federally

recognized Indian tribes within the Pacific Northwest and Alaska. The trust responsibility stems from various legal authorities including the U.S. Constitution, treaties, statutes, executive orders, historical relations with Indian tribes and, in this case, the Treaty of June 9, 1855. In general terms, the EPA is charged with considering the interest of tribes in planning and decision-making processes. Each office within the EPA is mandated to establish procedures for regular and meaningful consultation and collaboration with Indian tribal governments in the development of EPA decisions that have tribal implications. Region 10's Air and Radiation Division has contacted the Tribe to invite consultation on this title V operating permit project.

Endangered Species Act (ESA). Under this act, the EPA is obligated to consider the impact that a federal project may have on listed species or critical habitats. It is EPA's conclusion that the issuance of this title V permit will not affect a listed species or critical habitat because it does not authorize new emissions units or an increase in emissions. Therefore, no additional analysis and no additional requirements will be added to this permit for ESA reasons. EPA's no-effect determination concludes EPA's obligations under Section 7 of the ESA. For more information about the EPA's obligations, see the Endangered Species Consultation Handbook: Procedures for Conducting Consultation and Conference Activities under Section 7 of the Endangered Species Act, published by the FWS and NMFS (March 1998, Figure 1).

National Environmental Policy Act (NEPA). Under Section 793(c) of the Energy Supply and Environmental Coordination Act of 1974, no action taken under the Clean Air Act shall be deemed a major federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969. This permit is an action taken under regulations implementing the Clean Air Act and is therefore exempt from NEPA.

National Historic Preservation Act (NHPA). As noted earlier, the issuance of this title V permit does not authorize new emissions units, increase existing emission limits or impose any new work practice requirements. No changes to the facility are expected as a result of this permit action. Consequently, no adverse effects are expected, and further review under NHPA has not been done.

Environmental Justice (EJ) Policy. Under Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, signed on February 11, 1994, the EPA is directed, to the greatest extent practicable and permitted by law, to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States. Additionally, the Agency's Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples, issued July 24, 2014, assert's EPA's commitment to integrate EJ principles into work with federally recognized tribes and indigenous peoples.

The EPA has developed an EJ mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. According to EPA's EJSCREEN Version 2.1 environmental justice screening and mapping tool, 81% of the 3,027 persons within a three-mile radius of the facility identify as people of color (non-Hispanic, white alone), and 48% are classified as low-income. Additionally, six of the twelve "EJ Indexes" reported by EJSCREEN in this area meet or exceed the 90th percentile among Washington State block groups.

Though this permit action does not allow new or additional emissions and impacts, considering EJSCREEN data and the facility's location in Indian country, EPA identifies a potential for EJ concerns for the surrounding community. According to 2017-2021 American Community Survey 5-Year Estimates data, 1,014 of 8,523 households within the Yakama Nation Reservation and Off-Reservation Trust Land (11.9%) are "limited English-speaking." Of these households, 976 (96.3%) speak Spanish as a main language. To address possible language barriers related to community engagement, EPA is having the public notice of this draft permit published in both English and Spanish language local newspapers. See Section 6 of this statement of basis for more details.

The CAA title V permit program requires the EPA to issue a permit specifically describing the permittee's existing pollution control obligations under the CAA. A title V permit does not generally create any new substantive requirements, but rather simply incorporates all existing CAA requirements, called "applicable requirements," into a single unified operating permit applicable to a particular facility. Region 10 has created monitoring requirements in the Pace permit (e.g, quarterly visible emissions monitoring in Condition 2.18) when applicable requirements do not include monitoring sufficient to assure compliance with emission limitations (e.g., 20% opacity limit in Condition 2.9). The title V permit EPA is issuing to Pace does not authorize the construction of new emission units, or emission increases from existing units, nor does it otherwise authorize any physical modifications to the facility or its operations. The EPA has concluded that the permit appropriately incorporates all existing CAA requirements applicable to the facility.

5. Permit Content (describes basis for each condition in permit)

This title V operating permit compiles all the applicable requirements that apply to the permittee. Additional monitoring, recordkeeping and reporting requirements have been created where needed so the permit assures compliance with all of the applicable requirements. Each permit condition in the permit is explained below. The permit is organized into the following sections:

Part 71 Permit Issuance History
Permit Authority
Source Information and Emission Units
Permit Section 1: General Requirements
Permit Section 2: Facility-Wide Requirements
Permit Section 3: EU-1 – B8 Boiler
Permit Section 4: EU-2 – Emergency Generators
Permit Section 5: EU-4 – Combustion of Fogging Exhaust

Part 71 Permit Issuance History

This permit section briefly lists the past (and current) permit actions related to this source.

Permit Authority

This permit section states the EPA's authority for issuing this permit.

Source Information and Emission Units

This permit section contains a brief description of the facility and a list of emission units. A more detailed description of the facility can be found in Section 2 of this statement of basis.

Permit Section 1: General Requirements

This permit section includes conditions that are required in all title V permits. In some cases, facility-specific testing, monitoring, recordkeeping and reporting requirements for these permit conditions might be found in Section 2 of the permit because those requirements can vary from permit to permit. Unless otherwise specified, emission units are subject to the general requirements in Section 1 of the permit as well as the facility-specific requirements in Section 2 and the unit-specific requirements in Sections 3, 4 and 5.

Permit Condition 1.1 explains that the language in the underlying regulations takes precedence over paraphrased language in the permit. Some applicable requirements are paraphrased in the permit with the intention of clarifying the requirement, but with no intention of changing the underlying meaning of the requirement. Where there is a difference between the language in a permit and an underlying regulation, the wording in the underlying regulation should be used to interpret and implement the requirement. This permit condition also notes some underlying authorities that may have been used to create additional requirements in this permit.

Permit Condition 1.2 explains the terms and conditions in the permit are enforceable by the EPA and citizens in accordance with the CAA.

Permit Condition 1.3 explains the obligations of complying with all conditions of the part 71 permit and any noncompliance with the permit constitutes a violation of the CAA.

Permit Condition 1.4 explains that need to halt or reduce activity is not a defense in order to maintain compliance with the conditions of this permit.

Permit Conditions 1.5 and 1.6 are general compliance schedule requirements. Because the EPA is not aware of any non-compliance at the time of permit issuance, there is no issue-specific compliance schedule in the permit.

Permit Conditions 1.7 and 1.8 address a general permit shield which states that compliance with the permit is deemed compliance with the applicable requirements listed in the permit. The permittee is responsible for complying with any applicable requirements that exist but have not been included in the permit. The permittee did not request a specific permit shield for any specific requirement excluded from this permit and none is being granted.

Permit Condition 1.9 incorporates the credible evidence rule as reflected in the various applicable requirements cited as authority for this condition. It makes clear that language in the permit stating “compliance is determined with” or “demonstrate compliance by” does not preclude the use of other credible evidence to demonstrate that the permittee is not in compliance with an applicable requirement.

Permit Condition 1.10 requires the permittee to certify the truth, accuracy and completeness of all documents (notices, reports, data, and etc) submitted to the EPA. The certification must be signed by a responsible official as defined in 40 CFR 71.2. Pace’s responsible official is listed on the first page of the permit. The permittee should request an administrative amendment of the permit if the responsible official for the facility changes.

Permit Condition 1.11 explains how to submit information to the EPA.

Permit Condition 1.12 requires an annual compliance certification. The permittee must certify compliance with all permit conditions. If a permittee is aware of any information that indicates

noncompliance, that information must be included in the annual compliance certification. In a year when the permit is renewed or revised, the permittee must address each permit for the time that permit was in effect. Forms for the annual compliance certifications may be obtained on the internet at https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.

Permit Conditions 1.13 through 1.23 require submittal of an annual emission inventory (of actual emissions) and payment of fees for Part 71 purposes. These requirements refer to Permit Condition 2.1 for the actual due date by which fees and emissions must be submitted each year. The per-ton fee rate varies each year; the permittee should contact the EPA to obtain the current rate. The submittal of the emission inventory is timed to coincide with the payment of fees because annual title V fees are based on actual emissions generated during the previous calendar year. As explained in Section 3 of this statement of basis, the emission estimation techniques listed in this statement of basis should be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emissions are calculated based on actual operations, not maximum operational capacity.

Permit Condition 1.24 requires submittal of an annual emission inventory (of actual emissions) for FARR registration purposes. Appendix A to this statement of basis documents the methods, techniques, and assumptions that the EPA believes provide the most accurate basis for estimating actual emissions for this facility. As explained in Section 3 of this statement of basis, the emission estimation techniques listed in this statement of basis should be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emission are calculated based on actual operations, not maximum operational capacity. Note that the FARR emission inventory is required to be submitted to the EPA electronically via FORS unless it contains CBI. Submittals containing CBI are to be sent to the addresses specified in Condition 1.11. Copies of each document sent to the EPA should be sent to the Tribal Air Quality Coordinator except those containing CBI.

Permit Condition 1.25 and 1.26 require the permittee to submit or correct submitted information when requested by the EPA and as needed. The permittee has an ongoing obligation to assure that all data in its title V application is correct and to notify the EPA of any errors or omissions.

Permit Condition 1.27 does not convey any property rights of any sort, or any exclusive privilege through this permit.

Permit Condition 1.28 requires the permittee to allow EPA personnel and EPA-authorized representatives access to the facility and required records.

Permit Condition 1.29 address the expiration of the permit and the ramifications if the permittee does or does not renew their permit. It is important to note that, if the permittee does not submit a complete and timely renewal application, the permittee's right to operate is terminated. The expiration date of the permit is listed on the top right-hand corner of the front page of the permit.

Permit Condition 1.30 requires the permittee to submit an application for renewal and describe some of the information that must be included in the application.

Permit Conditions 1.32 through 1.34 address permit modifications and reopening.

Permit Conditions 1.35 and 1.36 address options for making certain physical and operational changes in the facility that do not require a permit modification.

Permit Condition 1.37 specifies the procedures that must be followed whenever the permit requires emissions testing or sampling in an emission unit-specific section of the permit. If there is a conflict between these permit conditions and an emission unit-specific permit condition, the unit-specific permit condition should be followed. Concentration-based emission limits required to be corrected to a specific oxygen concentration in the flue gas often do not contain a protocol to convert measured concentrations to specified oxygen levels. Permit Condition 1.37 provides a protocol for such a conversion.

Permit Conditions 1.38 through 1.40 describe general recordkeeping that has been added to the permit using part 71 authority to assure that there is good documentation for any monitoring that the permittee performs. Permit Condition 1.38 describes recordkeeping requirements that apply only if the permittee makes off permit changes.

Permit Conditions 1.41 through 1.44 require semi-annual monitoring reports and prompt deviation reports. Condition 1.42 specifies content of monitoring reports beyond basic requirement in 40 CFR 71.6(a)(3)(iii) to clearly identify "all instances of deviations from permit requirements." Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit. Failure to meet any permit term or permit condition, including emission standards, is considered a deviation. Other credible evidence (including any evidence admissible under the federal rules of evidence) must be considered by the source and the EPA in such determinations. The timing for reporting deviations, as well as other data collected, depends on the circumstances, as explained in these permit conditions.

Permit Condition 1.45 addresses the Stratospheric Ozone and Climate Protection Program found in 40 CFR part 82. This program requires sources that handle regulated materials to meet certain procedural and certification requirements. There may be equipment at the facility that uses or contains chlorofluorocarbons or other materials regulated under this program. All air conditioning and refrigeration units must be maintained by certified individuals if they contain regulated materials.

Permit Condition 1.46 addresses requirements in the Chemical Accident Prevention Program found in 40 CFR part 68. This program requires sources that use or store regulated substances above a certain threshold to develop plans to prevent accidental releases. Based on information in their application, there are no regulated substances above the threshold quantities in this rule at this facility; therefore, the facility is not currently subject to the requirement to develop and submit a risk management plan. However, this requirement is included in the permit as an applicable requirement because the permittee has an ongoing responsibility to submit a risk management plan if a listed substance exists at the facility in quantities over the threshold amount, or if the quantity of any regulated substance ever increases above the threshold quantity. Including this term in the permit minimizes the need to reopen the permit if the facility becomes subject to the requirement to submit a risk management plan.

Permit Condition 1.47 addresses asbestos demolition or renovation activity found in 40 CFR part 61, subpart M (NESHAP). This program requires sources that handle asbestos-containing materials to follow specific procedures. If the permittee conducts any demolition or renovation

activity at their planer mill, they must assure that the project is in compliance with the federal rules governing asbestos, including the requirement to conduct an inspection for the presence of asbestos. This requirement is in the permit to address any demolition or renovation activity that may occur at the facility.

Permit Section 2: Facility-Wide Requirements

This permit section includes applicable requirements and related testing, monitoring, recordkeeping and reporting that apply either to multiple emission units or on a facility-specific basis. Unless otherwise specified, emission units are subject to the facility-specific requirements in Section 2 of the permit as well as the general and unit-specific requirements in Sections 1, 3 and 4 of the permit.

Permit Condition 2.1 lists the due date for the annual fees and emission reports.

Permit Condition 2.2 limits the sulfur content of the gaseous fuel burned in any combustion device and specifies the method for determining compliance. The facility currently burns only propane. Because the sulfur content of propane is significantly small, Region 10 is waiving the requirement to track the sulfur content in the fuel and requiring only that the Permittee keep records showing that only propane is burned.

The limit's 1.1 g/dscm concentration is equivalent to 918 ppmw as illustrated through the following calculation based upon an equation in a table entitled, "Conversion Factors for Common Air Pollution Measurements: Atmospheric Gases" on page A-27 of Appendix A to AP-42: 918 ppmw = (1.1 g/m3) X (1000 mg/g) X (0.8347). Per the GPA Liquefied Petroleum Gas (LPG) Specifications Standard 2140-97, commercial propane is allowed to have the highest sulfur content among the four liquefied petroleum gas products (the other three being commercial butane, commercial b-p mixtures and propane HD-5). Commercial propane is limited to 185 ppmw, so the Permittee can satisfy the requirement to have vendor records by documenting that any of the four GPA-designated LPG products is burned. Hot box, boiler, engines and fogging afterburner are the only emission units that combust gaseous fuel. Permit Condition 1.26 requires Pace to notify Region 10 in the event the facility decides to combust gaseous fuel other than propane.

Permit Conditions 2.3 through 2.8 restrict open burning wherever the FARR applies including at industrial facilities. If the permittee performs any open burning, recordkeeping requirements specific to open burning found in Permit Condition 2.8 will apply.

Permit Conditions 2.9 through 2.11 limit visible emissions, require the use of either Reference Method 9 or a continuous opacity monitoring system (COMS) for determining compliance with the limit and provide exception to the rule. Reference Method 9 includes specific guidance for reading opacity when there is a wet plume (both attached and detached and directs the observer to take readings excluding the portion of the plume that includes uncombined water (droplets). In the vast majority of cases, the likelihood of exceeding the 20% opacity limit due to the presence of uncombined water is very low because an experienced observer would know that he/she should not read that portion of the plume. However, there are meteorological conditions that can prevent uncombined water (droplets) from completely evaporating in a plume (e.g., 100% relative humidity and a saturated plume). Currently, this facility does not use (and is not required to use) COMS to monitor visible emissions.

Permit Conditions 2.12 through 2.17 restrict fugitive particulate matter emissions and require a plan to assure the use of reasonable precautions to prevent fugitive emissions. The plan is based on a survey of the facility and is updated annually. This annual survey can be accomplished simultaneously with the periodic visible emission survey requirement in Permit Conditions 2.18 through 2.24, as long as both requirements are fully complied with. Permit Conditions 2.12 through 2.17 reflect requirements in the FARR that apply facility-wide.

Permit Conditions 2.18 through 2.24 requires a quarterly survey (also called a plant walkthrough) for visible and fugitive emissions as well as specific follow-up steps (investigation, corrective action, reference method 9 observation and additional recordkeeping and reporting) if visible or fugitive emissions are observed. If observed visible or fugitive emissions cannot be eliminated within 24 hours, a tiered sequence of reference method 9 opacity observations must be performed. Observations of visible or fugitive emissions during a survey are not considered deviations; however, any resulting reference method 9 readings above 20% opacity are considered permit deviations. The annual fugitive particulate matter survey can be accomplished simultaneously with a quarterly survey as long as both requirements are fully complied with. This permit condition serves as the general periodic monitoring for several fugitive and particulate matter limits found in the permit. This requirement applies to emission sources that normally do not exhibit visible or fugitive emissions. If the permittee prefers a specific periodic monitoring approach for any emission sources subject to this requirement, the permittee can propose a new approach as a permit modification.

Permit Condition 2.25 incorporates by reference FARR provisions related to (1) emissions detrimental to public health or welfare, and (2) air pollution episodes. See discussion of 40 CFR 49.135 and 49.137 in Section 4 (Regulatory Analysis) of the statement of basis.

Permit Section 3: EU-1 – B8 Boiler

Permit Condition 3.1 is the FARR particulate matter limit that applies to combustion source stack.

Permit Condition 3.2 is the FARR sulfur dioxide limit that applies to combustion source stack.

Permit Conditions 3.3 through 3.5 are generally applicable requirements that apply to any emission unit that is or becomes subject to an NSPS, unless otherwise specified in the NSPS. Because 40 CFR part 60, subpart Dc applies to EU-1, these conditions currently apply to the B8 boiler, as denoted in the headings.

Permit Condition 3.6 requires recordkeeping of usage of any fuel other than propane and occurrence, duration and actions taken during periods of malfunction.

Permit Condition 3.7 requires recordkeeping requirements of Subpart Dc for fuel usage.

Permit Condition 3.8 through 3.13 are generally applicable requirements from 40 CFR Part 60, subpart A that apply to the owner or operator of any stationary source which contains an affected facility subject to an NSPS, unless specified otherwise in the NSPS. EU-1 is an affected facility subject to 40 CFR Part 60, subpart Dc, and subpart Dc does not specify any subpart A general provisions that do not apply. Therefore, the requirements of subpart A are applicable requirements to which EU-1 is subject, as denoted in the headings.

Permit Section 4: EU-2 – Emergency Generators

Permit Condition 4.1 is the FARR PM limit that applies to combustion source stack.

Permit Condition 4.2 is the FARR SO2 limit that applies to combustion source stack.

Permit Condition 4.3 requires visible emissions observation while the engine is operated for purposes other than emergency operation.

Permit Condition 4.4 requires recordkeeping of operating hours, occurrence and duration of any and each malfunction and actions taken during periods of malfunction to minimize emissions.

Permit Condition 4.5 applies to EU-2b and requires compliance with the phase 1 emission standards in 40 CFR part 1054, appendix I, applicable to class II engines, and other requirements for new nonroad spark ignition engines in 40 CFR part 1054.

Permit Condition 4.6 requires EU-2b to be operated and maintained in accordance with the manufacturer's emission-related written instructions and requires the Permittee to keep records of conducted maintenance on EU-2b to demonstrate compliance with 40 CFR 60.4233(c).

Permit Condition 4.7 are NSPS JJJJ requirements applicable to a SI engine that is only operated in emergencies and on a limited basis for maintenance checks, readiness testing and other non-emergency situations. The facility is required to minimize emissions by maintaining the engine according to a written plan Authored by the manufacturer or the facility itself. For the SI engine, the certified emissions life (as defined in 40 CFR 60.4248) is the first five years or first 1,000 operating hours, whichever comes first pursuant to 40 CFR 1054.107(a)(1). Regardless of whether an engine's certified emission life has been exhausted, the Permittee is still required to operate and maintain the engine. The facility is required to maintain records of engine operation and maintenance performed. Because engine (EU-2b) is considered emergency engine, NSPS JJJJ requires that they be certified by the manufacturer to comply with EPA Phase I class II nonroad engine emission standards for propane fuel in 40 CFR 1054, Subpart I. If the engine was not considered emergency engine, it would be subject to more stringent emission standards in 40 CFR 1048 pursuant to 40 CFR 60.4231(c). Thus, it is critical for the Permittee to track the operating hours to maintain its classification as an emergency engine. There is no less stringent emission standards for emergency engines for this category of engine.

Permit Condition 4.9 applies to EU-2b and requires the Permittee to install a non-resettable hour meter and keep records of the hours of operation of the engine that is recorded through it to comply with 40 CFR 60.4237(c) at all times regardless of whether the engine is considered a non-certified engine. If the engine was not considered emergency engine, it would be subject to more stringent emission standards in 40 CFR 1048 pursuant to 40 CFR 60.4231(c). Thus, it is critical for the Permittee to track their operating hours to maintain its classification as an emergency engine.

Permit Condition 4.10 applies to EU-2b and requires the Permittee to keep records of the engine maintenance and documentations from the manufacturer certifying that the engine meets the emissions standards as required in 40 CFR parts 1048, 1054, and 1060, as applicable.

Permit Conditions 4.8 and 4.11 through 4.13 are generally applicable requirements from 40 CFR Part 60, subpart A that apply to the owner or operator of any stationary source which contains an affected facility subject to an NSPS, unless specified otherwise in the NSPS. EU-2b is an affected facility subject to 40 CFR Part 60, subpart JJJJ, and Table 3 to subpart JJJJ specifies which subpart A general provisions apply.

Permit Section 5: EU-4 – Combustion of Fogging Exhaust

Permit Condition 5.1 limits PM emissions from the afterburner.[3] The permit condition also contains the method for determining compliance. The limit applies at all times. No unit-specific PM testing is required of the afterburner based upon previous unit-specific test results and source category testing that suggests no control of fogging exhaust is necessary to comply with the 0.1 gr/dscf limit. If visible emission monitoring identifies a visible emission compliance concern, testing may be necessary to assure compliance with the FARR grain loading limit for the emission unit.

Permit Condition 5.2 limits the sulfur dioxide emissions from the afterburner stack and describes the methods for determining compliance. The limit applies at all times. The fogging exhaust is not expected to contribute any sulfur to afterburner stack emissions. Because the afterburner only uses propane as fuel, SO_2 emissions are expected to be well below the emission limit of 500 ppmdv at 7% O_2. For an example, see the calculation below:

SO_2 concentration = (sulfur content$_{\text{commerical propane}}$ by mass) X (density$_{\text{propane}}$) X (1/heating value$_{\text{propane}}$) X ($CF_{\text{Btu}\rightarrow\text{MMBtu}}$) X (Mass Ratio SO_2 Out/S In) X (1/F_d factor$_{\text{propane}}$) X ($CF_{\text{lb/ft3}\rightarrow\text{ppmv@20°C}}$)

= (185 lb S/1x10^6 lb fuel) X (4.24 lb fuel/gal fuel) X (gal fuel/90,500 Btu) X (1x10^6 Btu/MMBtu) X (2 lb SO_2/lb S) X (MMBtu/8710 dscf) X (385.6x10^6 dscf·ppmdv SO_2/32 lb SO_2)

= 23.9 ppmdv at 0% O_2

Where: Sulfur content$_{\text{commercial propane)}}$ by mass = 185 ppm. See GPA Liquefied Petroleum Gas Specifications Standard 2140-97.

F_d factor = 8710 dscf/MMBtu. See 40 CFR 60, Appendix A, RM19, Table 19-2.

$CF_{\text{lb/ft3}\rightarrow\text{ppmv@20°C}}$ = 385.6x10^6 dscf·ppmdv SO_2/32 lb SO_2. See Conversion Factors for Common Air Pollution Measurements – Atmospheric Gases presented on page A-27 of Appendix A to AP-42.

The recordkeeping (fuel vendor records showing sulfur content of the propane or the type of LPG received) required in Permit Condition 2.2.2 will serve as the monitoring to assure compliance for the afterburner.

Permit Condition 5.3 requires the permittee to maintain fuel and runtime records.

6. Public Participation

Public Notice and Comment Period

As required in 40 CFR 71.11(a)(5) and 71.8, all draft operating permits must be publicly noticed

[3] The afterburner is not subject to the "corrected to 7% O2" combustion source stack grain loading standard in 40 CFR 49.125(d)(1). It is appropriate to "correct" the exhaust concentration of a combustion source stack to a standard %O2 (to account for unwarranted introduction of air into the exhaust) when the subject pollutant is primarily the by-product of combustion. But in this case, the PM in the afterburner exhaust is primarily from the fogging exhaust and not the byproduct of combusting propane to promote oxidation of organics.

and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71.11(d). There is a 30-day public comment period for actions pertaining to a draft permit. For this permit action, the requirements of 40 CFR 71.11(a)(5) and 71.8 will be satisfied as follows:

1. Posting the public notice (English and Spanish language), draft permit, statement of basis and the draft administrative record (which includes the application and relevant supporting materials) on EPA's website https://www.epa.gov/publicnotices/notices-search/location/Washington for the duration of the public comment period. Public notice is also being provided through one-day publication of the notice in the daily Yakima Herald-Republic (English and Spanish language newspapers). During that time, Region 10 is receiving comments and requests for a public hearing at r10_air_permits@epa.gov.
2. Providing a copy of the public notice to: the permit applicant, the affected states, the air pollution control agencies of affected states, the Tribal, city and county executives, any comprehensive land use planning agency, any state or federal land manager whose lands may be affected by emissions from the source, the local emergency planning authorities which have jurisdiction over the area where the source is located and all persons who submitted a written request to be included on the EPA's mailing list for title V permitting actions.

Notice of the draft permit action and opportunities to comment and request a hearing was posted on Region 10's website at http://www.epa.gov/publicnotices/notices-search/location/washington from June 09, 2023 through July 10, 2023. The administrative record was available to review online over that same time period and at the same website. Region 10 also distributed the public notices to the necessary parties via e-mail. Region 10 announced an opportunity for a public hearing on the draft permit contingent upon public interest. Because no requests were received for a public hearing, none was held. The public notice was published in both English and Spanish versions of the Yakama Herald newspaper on June 09, 2023.

Response to Public Comments and Permit Issuance

As required in 40 CFR 71.11(e), the EPA will consider all timely comments received when making a final decision. The EPA's response to any comments received during the public comment period or public hearing held for this permit will be addressed in this section of the final statement of basis. As required in 40 CFR 71.11(i), the EPA will notify the applicant and each person who submits comments or requested notice of the final permit decision.

No comments were received from the public during the comment period. The only comment received was from the applicant to update the facility contact as the Senior Manager of Operations. EPA has notified the applicant of receipt of this comment and the change made for the facility contact to Senior Manager of Operations. The reference of the responsible official identified in the draft permit is deleted.

Table A.1 - Potential to Emit Post-Harvest Coatings Production Process

Parameter	PTE
Post-Harvest Coatings production process rate[1] (gallons/year) is 2,400,000	
Emission factors: VOC[2] (lb/gallon) is 0.15	
Emission Factors: Total combined HAPs[3] (lb/gallon) is 0.005	
VOC emissions (tons/yr)	180.0
Total combined HAPs (tons/yr)	6.0

[1] Facility production personnel estimate the maximum annual production rate to be 1.5 times the production rate in 2015 (a historical high production year).
[2] Maximum ratios of historic actual emissions to production are conservatively increased to allow for flexibility of plant operations.
[3] The production process in 2019 had low emissions of HAPs. For years 2010 - 2019, 1.66 tpy were the greatest annual emissions of total combined HAPs from the production process. This occurred in 2014, and the 2014 actual emission factor was 0.0023 lb/gallon for total combined HAPs from the production process.

Table A.2 – Potential to Emit from the use of Fogging Chemicals and Fogging System

Fogging materials remaining in vapor exhaust[1] – 100%
Destruction Efficiency[2] – 0%
Fogging material used[3] – 618 (kg/yr)
Total estimated testing time for fogging chemicals – 800 (hours/year)
VOC Emissions from Fogging Chemicals – 0.68 tpy
Chemical use/hour – 0.77 (kg/hour)
Maximum VOC Emissions from Fogging Chemicals – 7.46 tpy

[1] Some of the fogging materials deposit on the walls and food items in the enclosure during actual operations. However, it is conservatively assumed that no chemicals are deposited for the purpose of PTE calculations.
[2] For potential-to-emit calculations, no destruction efficiency is claimed since there is no enforceable requirement to operate the afterburner. Actual destruction efficiency is expected to be approximately 98% based on typical values for thermal oxidation devices.
[3] Engineering estimate for total mass of fogging chemicals used in testing.

Total Criteria Pollutants PTE from Afterburner

Pollutant	**Emissions (lb/hr)**	**Emission (tons/yr)**	**Emission Factor[1] (lb/1000 gallons)**
$PM/PM_{10}/PM_{2.5}$	0.01	0.05[2]	0.7
Sulfur dioxide (SO_2)	3.28E-04	1.44E-03	0.02
Nitrogen oxide (NO_X)	0.21	0.93	13
Volatile Organic Compounds (VOC)	0.01	0.06	0.8
Carbon Monoxide (CO)	0.12	0.54	7.5

[1] From AP-42 Table 1.5-1
[2] The PM_{10} and $PM_{2.5}$ are assumed equal to PM

Total Criterial Pollutants PTE from the Fogging System

Pollutant	**Emissions (lb/hr)**			**Emissions (tons/yr)**		
	VOC from Fogging Chemicals	**Afterburner Emissions**	**Total Emissions**	**Fogging Chemicals**	**Afterburner Emissions**	**Total Emissions**
$PM/PM_{10}/PM_{2.5}$	--	0.01	1.15E-02	--	0.05	5.03E-02
SO_2	--	3.28E-04	3.28E-04	--	1.44E-03	1.44E-03
NO_X	--	0.21	0.21	--	0.93	0.93
VOC	1.7	0.01	1.71	7.46	0.06	7.51
CO	--	0.12	0.12	--	0.54	0.54

Table A.3 – Potential to Emit from Wastewater Sump

Wind speed above pool[1] (m/sec)	Molecular weight of pool liquid[2]	Pool Liquid Temp.[3] K	Conc. of VOC in Sump[4] (mg/L)	Conc. of VOC in sump (wt. %)	Vapor pressure of pool liquid[5] (mmHg)	Surface area of pool (ft^2)	Emissions	
							lb/hr	Tons/yr
29.8	87.12	303.54	400	0.04	31.84	160	0.39	1.70

[1] While the actual wind speed over the water in the sump is likely much lower than this value, this represents a minimum cross-sectional area through which the air must travel (based on the available fan and stack dimensions) and is therefore the highest possible wind speed.
[2] The molecular weight of morpholine is used to represent the MW of the VOC emissions. Of the 3 most common chemicals in the mass balance of chemicals used at the facility, morpholine has the largest molecular weight.
[3] This temperature is the average maximum value as listed by the TankESP program for nearby Yakima, WA.
[4] The concentration was measured directly from wastewater pond as TOC. This measurement took place in December 2018 and assumes that the concentration in the pond is representative of the concentration in the wastewater sump.
[5] This value represents the vapor pressure of pure water at 30°C. The vapor pressure of water was used the pool liquid since the liquid in the sump is primarily water, and the vapor pressures of the main VOCs in the wastewater do not differ significantly from that of water.

Table A.4 – Potential to Emit from Boiler B8

Maximum heat input capacity[1] – 31.7 mmBtu/hr			
Pollutant	Emission Factor (lb/mmBtu)	Emission Rate	
		Lb/hr	Tons/yr
Particulate Matter (PM_{10})/($PM_{2.5}$)[2]	0.01	0.24	1.06
Sulfur dioxide (SO_2)[3,4]	1.10E-03	0.03	0.15
Nitrogen oxides (NO_X)[3]	0.11	3.34	14.62
Volatile Organic Compounds (VOC)[3]	8.30E-03	0.26	1.15
Carbon Monoxide (CO)[3]	0.04	1.21	5.3

[1] B8 heat input rating obtained from specifications provided by Cole Industrial for 100% firing rate.
[2] Emission factors for PM are obtained from Table 1.5-1, AP-42 Chapter 1.5, Liquefied Petroleum Gas
Combustion rather than specifications provided by Cole Industrial.
[3] Emission factors for B8 are obtained from specifications provided by Cole Industrial for 100% firing rate.
[4] The emission factor for SO_X is used for SO_2.

Table A.5 – Potential to Emit from Emergency Generators

Generator Rating Fuel Consumption when Primed			
Server Room	25 kW		Fuel consumption when primed – 0.42 mmBtu/hr
Laboratory Equipment	50 kW		Fuel consumption when primed – 0.68 mmBtu/hr
Annual Operating Hours for Emergency Generators	500 hours		--
Pollutant	**Emissions**		**Emissions Factor[1]**
	Lb/hr	**Tons/yr**	**Lb/mmBtu**
(PM, PM_{10}, $PM_{2.5}$)[2]	1.04E-02	2.60E-03	9.50E-03
Sulfur dioxide (SO_2)	6.45E-04	1.61E-04	5.88E-04
Nitrogen oxides (NO_X)	2.49E+00	0.62	2.27E+00
Volatile Organic Compounds (VOC)	3.25E-02	8.12E-03	2.96E-02
Carbon Monoxide (CO)	3.85E+00	0.96	3.51E+00
Total HAPs	3.56E-02	0.01	See Below

HAPs from Emergency Generators

Pollutant	**Emission Factors[3]**	**Emissions**	
	Lb/mmBtu	**Lb/hr**	**Tons/yr**
1,1,2,2-Tetrachloroethane	2.53E-05	2.77E-05	6.94E-06
1,1,2-Trichloroethane	1.53E-05	1.68E-05	4.20E-06
1,3-Butadiene	6.63E-04	7.27E-04	1.82E-04
1,3-Dichloropropene	1.27E-05	1.39E-05	3.48E-06
Acetaldehyde	2.79E-03	3.06E-03	7.65E-04
Acrolein	2.63E-03	2.88E-03	7.21E-04
Benzene	1.58E-03	1.73E-03	4.33E-04
Carbon Tetrachloride	1.77E-05	1.94E-05	4.85E-06
Chlorobenzene	1.29E-05	1.41E-05	3.54E-06
Chloroform	1.37E-05	1.50E-05	3.76E-06
Ethylbenzene	2.48E-05	2.72E-05	6.80E-06
Ethylene Dibromide	2.13E-05	2.34E-05	5.84E-06
Formaldehyde	2.05E-02	2.25E-02	5.62E-03
Methanol	3.06E-03	3.36E-03	8.93E-04
Methylene Chloride	4.12E-05	4.52E-05	1.13E-05
PAH	1.41E-04	1.55E-04	3.87E-05
Styrene	1.19E-05	1.31E-05	3.26E-06
Toluene	5.58E-04	6.12E-04	1.53E-04
Vinyl Chloride	7.18E-06	7.87E-06	1.97E-06
Xylene	1.95E-04	2.14E-04	5.35E-05
Total HAPs		3.56E-02	8.89E-03

[1] Emergency generators are propane-fired. Internal combustion factors for propane are not available in AP-42. Emissions due to internal combustion of propane are approximated using natural gas factors for 4-stroke rich burn engines, obtained from AP-42 Table 3.2-3. The emergency generators are classified as rich burn engines based on the fuel to air ratio provided by the generator manufacturers.

[2] PM emissions are assumed equivalent to PM10 and PM2.5.

[3] Emergency generators are propane-fired. Internal combustion factors for propane are not available in AP-42. Emissions due to internal combustion of propane are approximated using natural gas factors for 4-stroke rich burn engines, obtained from AP-42 Table 3.2-3. The emergency generators are classified as rich burn engines based on the fuel to air ratio provided by the generator manufacturers.

Table B.1 – NSPS Applicability 40 CFR Part 60, Subpart Dc

Citation	Requirement	Applicability
40 CFR 60.40c	Applicability: (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).	Applies because B8 boiler is 31.7 mmBtu/hr, but does not include "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.41c	60.41c Definitions. As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.	The definitions apply, but do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.42c, (a)-(c)	60.42c Standard for sulfur dioxide (SO2). Standards for affected facilities burning coal.	No – B8 boiler only combusts propane
40 CFR 60.42c, (d)	60.42c Standard for sulfur dioxide (SO2). (d) On and after the date on which the initial performance test is completed or required to be completed under 60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to	No – B8 boiler only combusts propane

Citation	Requirement	Applicability
	be discharged into the atmosphere from that affected facility any gases that contain SO2in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.	
40 CFR 60.42c, (e)	60.42c Standard for sulfur dioxide (SO2). (e) Standards for affected facilities combusting coal or oil with any other fuels.	No – B8 boiler only combusts propane
40 CFR 60.42c, (f)	60.42c Standard for sulfur dioxide (SO2). (f) Reduction in the potential SO2 emission rate through fuel pretreatment is not credited toward the percent reduction requirement under paragraph (b)(2) of this section unless…	No – B8 boiler only combusts propane
40 CFR 60.42c, (g)	60.42c Standard for sulfur dioxide (SO2). (g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.	No – B8 boiler only combusts propane

Citation	Requirement	Applicability
40 CFR 60.42c, (h)	60.42c Standard for sulfur dioxide (SO2). (h) For affected facilities listed under paragraphs (h)(1), (2), (3) or (4) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under 60.48c(f), as applicable. (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr). (2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). (3) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). (4) Other fuels-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/h)	No – B8 boiler is not subject to any limit under this section
40 CFR 60.42c, (i)	60.42c Standard for sulfur dioxide (SO2). (i) The SO2emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.	No – B8 boiler only combusts propane; no SO2 emission standard for affected facilities that only combust propane.

Citation	Requirement	Applicability
40 CFR 60.42c, (j)	60.42c Standard for sulfur dioxide (SO2). (j) For affected facilities located in noncontinental areas and affected facilities complying with the percent reduction standard…	No – Pace is not located in a noncontinental area
40 CFR 60.43c, (a) - (b)	60.43c Standards for Particulate Matter (PM) Establishes PM standards for coal and wood fired units.	No – B8 boiler only combusts propane
40 CFR 60.43c, (c)	60.43c Standards for Particulate Matter (PM) (c) Establishes opacity standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	No – B8 boiler only combusts propane
40 CFR 60.43c, (d)	60.43c Standards for Particulate Matter (PM) (d) Requires that the PM and opacity standards of this section apply at all times, except during periods of startup, shutdown or malfunction.	No – B8 boiler is not subject to PM and opacity standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.43c, (e)	60.43c Standards for Particulate Matter (PM) (e) Establishes PM standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	No – B8 boiler only combusts propane
40 CFR 60.44c, (a) -(g)	60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide	No – B8 boiler is not subject to SO2 standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.44c, (h)	60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide. (h) For affected facilities subject to 60.42c(h)(1), (2), or (3)	No – B8 boiler is not subject to SO2 standards of 40 CFR Part 60, Subpart Dc

Citation	Requirement	Applicability
	where the owner or operator seeks to demonstrate compliance with the SO2standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable.	
40 CFR 60.44c, (i)-(j)	60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide	No – B8 boiler is not subject to SO2 standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.45c	60.45c Compliance and Performance Test Methods and Procedures for Particulate Matter	No – B8 boiler is not subject to PM and opacity standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.46c	60.46c Emissions Monitoring for Sulfur Dioxide	No – B8 boiler is not subject to SO2 standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.46c, (e)	60.46c Emissions Monitoring for Sulfur Dioxide (e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to 60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO2standards based on fuel supplier certification, as described under 60.48c(f), as applicable.	No – B8 boiler is not subject to SO2 standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.47c	60.47c Emissions Monitoring for Particulate Matter	No – B8 boiler is not subject to PM and opacity standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.48c, (a)	60.48c Reporting and	Applied – obsolete requirement

Citation	Requirement	Applicability
	Recordkeeping Requirements (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part.	
40 CFR 60.48c, (b)	60.48c Reporting and Recordkeeping Requirements (b) The owner or operator of each affected facility subject to the SO2emission limits of 60.42c, or the PM or opacity limits of 60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.	No – B8 boiler is not subject to SO2 or PM standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.48c, (c)	60.48c Reporting and Recordkeeping Requirements (c) In addition to the applicable requirements in 60.7, the owner or operator of an affected facility subject to the opacity limits in 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period and maintain records	No – B8 boiler is not subject to SO2 or PM standards of 40 CFR Part 60, Subpart Dc

Citation	Requirement	Applicability
	according to the requirements specified in paragraphs (c)(1) through (3) of this section, as applicable to the visible emissions monitoring method used.	
40 CFR 60.48c, (d)	60.48c Reporting and Recordkeeping Requirements (d) The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under 60.42c shall submit reports to the Administrator.	No – B8 boiler is not subject to SO2 or PM standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.48c, (e)	60.48c Reporting and Recordkeeping Requirements (e) The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under 60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.	No – B8 boiler is not subject to SO2 or PM standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.48c, (f)	60.48c Reporting and Recordkeeping Requirements (f) Fuel supplier certification shall include the following information…	No – B8 boiler is not subject to SO2 or PM standards of 40 CFR Part 60, Subpart Dc
40 CFR 60.48c, (g)	60.48c Reporting and Recordkeeping Requirements	Applies; see Permit Condition 3.7

Citation	Requirement	Applicability
	(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day…	
40 CFR 60.48c, (h)	60.48c Reporting and Recordkeeping Requirements (h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under 60.42c or 60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.	Does not apply because Pace does not have an annual capacity factor limit.
40 CFR 60.48c, (i)	60.48c Reporting and Recordkeeping Requirements (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.	Applies; see Permit Condition 3.7.3
40 CFR 60.48c, (j)	60.48c Reporting and Recordkeeping Requirements (j) The reporting period for the reports required under	Does not apply because propane - fired boilers are not subject to reporting for SO2 or PM limits.

Citation	Requirement	Applicability
	this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.	

Table B.2 – NSPS Applicability 40 CFR Part 60, Subpart JJJJ

Citation	Requirement	Applicability
40 CFR 60.4230(a)(4)(iv)	IC Engines manufactured on or after January 01, 2009, for emergency engines with a maximum engine power greater than 19 kW (25 HP)	Applies to 50 kW engine only. The 25 kW unit was manufactured prior to January 01, 2009, and has not been subsequently modified or reconstructed, therefore, the provisions of NSPS Subpart JJJJ are not applicable to the 25 kW generator. Applicability provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.4233(c)	Emission Standards	Applies; The requirement is for engines that use LPG must comply with the emission standards in 60.4231(c) for their stationary SI ICE. Stationary SI internal combustion engine manufacturers must certify their emergency stationary SI ICE greater than 25 HP and less than 130 HP that are rich burn engines that use LPG and that are manufactured on or after the applicable date in 60.4230(a)(4) to the Phase 1 emission standards in 40 CFR 1054, appendix I, applicable to class II engines, and other requirements for new nonroad SI engines in 40 CFR part 1054. See condition 4.5.
40 CFR 60.4234	Duration of emission standards	Applies; see Permit Condition 4.6.1.
40 CFR 60.4237(c)	Monitoring Hours of Operation	Applies; The requirement is applicable to the 50 kW generator. However, both the propane-fired emergency generators are each equipped with a non-resettable hour meter. See condition 4.9.
40 CFR 60.4243(a)(1)	Operation and maintenance requirements and recordkeeping	Applies; If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. See condition 4.6.1 through 4.6.3.
40 CFR 60.4243(a)(2)	Operation and maintenance requirements and recordkeeping	Applies; see Permit Condition 4.6.4.

Citation	Requirement	Applicability
40 CFR 60.4243(d)	Operational requirements	Applies; Any operation other than emergency operation (no time limit), maintenance checks and readiness testing (up to 100 hours per year), and operation in non-emergency situations (up to 50 hours per year), is prohibited. Ongoing compliance is demonstrated via compliance with the recordkeeping requirements in 60.4245(b). See condition 4.7
40 CFR 60.4245 (a) and (b)	Notification, reporting, and recordkeeping requirements	Applies; Owners and operators of all stationary SI ICE must keep records of: (1) All notifications submitted to comply with this subpart and all documentation supporting any notification, (2) Maintenance conducted on the engine, and (3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 1048, 1054, and 1060, as applicable. For all stationary SI emergency ICE greater than 25 HP and less than 130 HP manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator of 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. See conditions 4.6.4.3, 4.11 and 4.12.

Table B.3 – NSPS Applicability 40 CFR Part 60, Subpart A

Citation	Requirements	Applicability
40 CFR 60.1 – 60.3	Applicability, definitions and units	Apply to EU-1 for NSPS subpart Dc and EU-2b for subpart JJJJ, but are not included in the permit. Provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.4 (a)	Reporting address	Applies to EU-1 for NSPS subpart Dc and EU-2b for subpart JJJJ; see Permit Condition 1.11. Unless the report contains confidential business information, report information to EPA online via CEDRI.
40 CFR 60.4 (b)	Delegation	Applies to EU-1 for NSPS subpart Dc and EU-2b for subpart JJJJ, but are not included in the permit. Provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.5 – 60.6	Construction and review of plans	Apply to EU-1 for NSPS subpart Dc and EU-2b for subpart JJJJ, but are not included in the permit. Provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.7(a)(1, 3)	Initial notification	Applied to EU-1 for NSPS subpart Dc; obsolete requirements for EU-1. Provision does not apply to EU-2b given absence of applicable requirement in 40 CFR pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(a)(4)	Modification notification	Applies; see Permit Condition 3.12 for EU-1. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(a)(5-7)	CMS and opacity notification	Do not apply because Subpart Dc for propane fired boiler and JJJJ for emergency engines does not contain CMS or opacity requirements. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(b)	Startup, shutdown, malfunction records	Applies; see Permit Condition 3.8 for EU-1. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(c-e)	CMS recordkeeping	Do not apply because Subpart Dc and JJJJ for emergency engines does not require CMS. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(f)	Recordkeeping	Applies; see Permit Condition 3.9 for EU-1. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(g)	Similar notification	Does not apply because Yakama Nation does not require notification. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.7(h)	Individual subpart clarification	Applies, but is not included in the permit for EU-1. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.

Citation	Requirements	Applicability
40 CFR 60.8	Performance tests	Does not apply because neither Subpart Dc for propane fired boiler nor Subpart JJJJ for emergency engines require testing.
40 CFR 60.9 – 60.10	Availability of information and state authority	Apply, but are not included in the permit. Provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.11(a-c)	Compliance with standards including opacity	Do not apply for EU-1 because the standards in Subpart Dc do not apply. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.11(d)	Good air pollution control practice	Applies; see Permit Condition 3.3. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.11(e)	Opacity compliance	Do not apply because Subpart Dc and JJJJ for emergency engines does not limit opacity. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.11(f)	Conflicting subpart provisions	Applies, but is not included in the permit. Provision does not apply to EU-2b pursuant to Table 3 to NSPS subpart JJJJ.
40 CFR 60.11(g)	Credible evidence	Applies; see Permit Condition 3.4. Provision does not apply to EU-2b.
40 CFR 60.12	Circumvention	Applies; see Permit Conditions 3.5 and 4.8.
40 CFR 60.13	Monitoring	Does not apply because Subparts Dc and JJJJ do not require a continuous monitoring system (as defined in 40 CFR 60.2) for EU-1 or EU-2b.40 CFR 60.13 applies to continuous monitoring systems. Also, Table 3 to Subpart JJJJ specifies that this section does not apply to Subpart JJJJ.
40 CFR 60.14	Modification	Applies, but is not included in the permit.
40 CFR 60.15	Reconstruction	Applies; see Permit Conditions 3.13 and 4.13.
40 CFR 60.16 & 60.17	Priority list & Incorporations by reference	Apply, but are not included in the permit. Provisions do not include an "applicable requirement" as defined in 40 CFR 71.2.
40 CFR 60.18	Control devices	Does not apply because Subpart Dc and JJJJ do not refer to this section. See 40 CFR 60.18(a)(1).
40 CFR 60.19	General notification and reporting	Applies; see Permit Conditions 3.10, 3.11, 4.11 and 4.12.

Table B.4 – NESHAP Applicability 40 CFR Part 63, Subpart ZZZZ

Citation	Description	Applicability
40 CFR 63.6590(c)	Stationary spark ignition internal combustion engines subject to regulation under 40 CFR part 60, subpart IIII or JJJJ	Applies to EU-2a and EU-2b; 40 CFR part 63 subpart ZZZZ requirements are satisfied by meeting the requirements of 40 CFR part 60 subpart JJJJ for spark ignition engines.