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

Permit Number: R10T5090000
Issued: DRAFT
Effective: DRAFT
Expiration: five years from issue
AFS Plant I.D. Number: 16-009-00001

Response to Comments

Title V Air Quality Operating Permit
Initial Permit

Permit Writer: Dan Meyer

PotlatchDeltic Land and Lumber, LLC – St. Maries Complex

Coeur d'Alene Reservation
St. Maries, Idaho

On August 21, 2024, the Environmental Protection Agency, Region 10 (Region 10) proposed a draft Part 71 permit for the PotlatchDeltic Land and Lumber, LLC – St. Maries Complex located on the Coeur d'Alene Reservation. Region 10 held a public hearing on December 3, 2024. A total of 15 people provided oral comments during the public hearing. Region 10 received written comments until December 17, 2024. Region 10 received 24 written comments. The purpose of this document is to summarize the comments received and provide responses in accordance with 40 CFR 71.11(j).

Table of Contents

Comment Index

Comment Identification No.	Commenter
A	Atlas Boiler
B	American Wood Council
C	Benewah County Commissioners
D	Biomass Fired Specialty
E1	Coeur d'Alene Tribe – Brittney Nomee
E2	Coeur d'Alene Tribe – Jillian Harmon
F	Clear Process
G	Hampton Lumber
H	Idaho Association of Commerce & Industry (IACI)
I	State of Idaho Congressional Delegation
J	Idaho Forest Group
K	JCforestryllc
L	Landau Associates
M	Mayor of the City of St. Maries
N	National Council for Air and Stream Improvement (NCASI)
O	Oregon Business & Industry
P	Oregon Forest Industries Council (OFIC)
Q1	PotlatchDeltic – Allen Shoemaker
Q2	PotlatchDeltic – Ashlee Cribb
Q3	PotlatchDeltic – Ethan Sanchez
Q4	PotlatchDeltic – Wes Green
R	PPC Industries
S	RTP Environmental
T	Stimson
U	Public Hearing Transcript

Response to Comments

1. General Comments

1.1. Comments regarding timing

Commenters: E1; E2; Q2; T; U.

Comment: Several commenters stated that Region 10 has taken too long to issue this Part 71 permit.

Response: Region 10 agrees with these commenters. PotlatchDeltic submitted a timely initial Part 71 air operating permit application to EPA Region 10 for SMC on October 6, 1999. Under 40 CFR 71.7(a)(2), Region 10 was required to take final action on this application within 18 months (by April 6, 2001). Region 10 is well past its deadline to issue the permit. Region 10 understands that its failure to issue a timely Part 71 permit leaves the permittee and the public without a vital tool to understand and implement CAA requirements at the SMC. Simply put, Region 10 must do better in the future.

1.2. Comments regarding the importance of the SMC to the St. Maries Economy

Commenters: C; H; I; J; K; M; Q1-Q4; U.

Comments: Several commenters raised concerns about the draft part 71 permit's impacts on the financial viability of the SMC. These commenters intimated that the costs PotlatchDeltic would have to incur to comply with the Part 71 permit may force the company to close the SMC. The commenters further indicated that such a closure would have devastating consequences on the St. Maries community. In its comments, PotlatchDeltic stated that the company would invest over $5 million dollars in capital improvements to the SMC if EPA retains certain conditions related to compliance with the National Emissions Standard for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Boiler MACT). These included performance testing requirements, electrostatic precipitator (ESP) supplemental parametric monitoring, recordkeeping, and reporting, and supplemental monthly carbon monoxide (CO) monitoring, recordkeeping, and reporting. PotlatchDeltic did not provide a detailed accounting of the costs it envisions.

Response: Region 10 appreciates the commenters raising these concerns and articulating the broader importance of the SMC to the St. Maries community. As explained in detail in response to other comments, EPA has either removed these conditions entirely or significantly revised them. EPA does not anticipate compliance with the Part 71 permit will necessitate a significant increase in PotlatchDeltic's current compliance costs.

1.3. Comments regarding the need to protect and preserve air quality in the St. Maries Community

Commenters: E1; E2.

Comments: Two commenters representing the Coeur d'Alene Tribe noted that ambient air is at or near the National Ambient Air Quality Standards in the St. Maries area and that a Title V permit is important to ensure the area remains in attainment.

Response: EPA acknowledges that measured concentrations of fine particulates, referred to as PM2.5, are near the 24-hour and annual National Ambient Air Quality Standards (NAAQS) of 35 micrograms per cubic meter (µg/m3) and 9.0 µg/m3, respectively. See Table 1, below. EPA shares the Coeur d'Alene Tribe's concerns regarding preserving air quality inside and outside the Coeur d'Alene Reservation. We note that the tribal minor new source review permit, issued by Region 10 on October 14, 2021, contains emission limitations designed to ensure the St. Maries Complex does not cause or contribute to a violation of the $PM_{2.5}$ NAAQS.[1] Region 10 has incorporated these requirements into the Part 71 permit.

Table 1: St. Maries $PM_{2.5}$ Monitor[2]

Year	Annual Mean in $\mu g/m^3$ (Wildfire smoke impacted days excluded)	98th percentile in $\mu g/m^3$ (Wildfire smoke impacted days excluded)
2021	10.5 (7.6)	55 (21)
2022	9.7 (8.5)	37 (33)
2023	9.4 (8.6)	28 (25)
2023 Design Values	**9.9 (8.2)**	**40 (25)**

EPA appreciates the efforts of the St. Maries community to improve the air quality in the St. Maries Airshed through implementation of the St. Maries Airshed PM Advance Program. For more information on the program, see the document prepared by IDEQ and City of St. Maries available online.

1.4. Comments regarding Region 10's approach to writing air quality permits.

Commenters: I; K; O; P; Q2; Q4; R.

Comments: Several commenters were critical of Region 10's process for issuing air quality permits generally and this Part 71 permit in particular. Some commenters ascribed malintent to

[1] Minor New Source Review Permit, Revision No. 3, Permit No. R10TNSR01803 at Section 3, available at https://www.epa.gov/system/files/documents/2021-10/211014_potlatchdeltic_mnsr_permit_revision_no3.pdf.
[2] For illustrative purposes only. This does not reflect completion of the exceptional events process under 40 CFR part 50.

Region 10 permit writing staff when drafting permit conditions. Other commenters accused EPA of being uncollaborative and ignoring PotlatchDeltic's input.

Response: While these comments do not suggest changes to the permit in themselves, they warrant a response from Region 10. Region 10's fundamental goal when drafting Part 71 permits is to ensure the permits comply with the CAA and part 71, with particular solicitousness to the statutory mandate that all Title V permits assure compliance with all applicable requirements. Region 10 staff pursue this goal objectively and professionally. Any indication that Region 10 staff's goal in writing permits is to negatively impact or disadvantage a particular source is false.

In order to write permits that meet CAA requirements, Region 10 permit writing staff spend significant time reviewing information provided by the company and researching additional information to better understand how the emission units within the source (and the air pollution control equipment serving the units) function and comply with the underlying applicable requirements. Region 10 staff will often engage with the Permittee's staff in this effort. For this Part 71 permit, Region 10 staff engaged with PotlatchDeltic staff numerous times in the years leading up to proposal of the draft permit. Region 10 also shared numerous early drafts of the permit and statement of basis (SOB) with PotlatchDeltic. Thus, Region 10's process was—and continues to be—collaborative.

Some commenters accused Region 10 staff of ignoring PotlatchDeltic's input during the early engagement process. Region 10 disagrees with these comments, but Region 10 acknowledges PotlatchDeltic's point of view. Region 10 and PotlatchDeltic disagreed on the propriety of many conditions in early draft permits—particularly those designed to assure compliance with applicable requirements. The commenters should not conflate disagreements with EPA ignoring PotlatchDeltic's input. The permit record is replete with examples of Region 10 carefully reviewing the information provided by PotlatchDeltic and adjusting the permit conditions accordingly. Region 10 also acknowledges that it did not in all cases accept PotlatchDeltic's input if Region 10 could not independently verify the input with empirical data. Region 10's approach here is animated by the requirement in 40 CFR 71.7(a)(5) to set forth the legal and factual basis for the draft permit. Merely accepting the permittee's statements without independent verification is the hallmark of arbitrary permit writing.

Region 10 notes that it has accepted nearly all of PotlatchDeltic's suggested revisions to the draft permit in response to PotlatchDeltic's, as well as many industry experts', comments. These comments are supported by clear, verifiable evidence. Region 10 appreciates the time and effort of the commenters in providing this evidence. Region 10 acknowledges that its predraft collaboration process did not function as intended here. Region 10 commits to reviewing its processes and identifying areas for improved communication and collaboration with the Permittee.

2. Legal Comments

2.1. Source Determination

Commenters: Q2

Permit Condition: 1; 4.15; 4.16.

Comments: PotlatchDeltic contests EPA's characterization in the permit and statement of basis of the St. Maries Complex (SMC) and Lumber Drying Division (LDD) as a single [major] stationary source. Potlatch specifically objects to condition 1 of the draft Permit, which describes the stationary source, as well as conditions 4.15 and 4.16, which incorporate applicable requirements from 40 CFR 52.21(r)(6). PotlatchDeltic contends that Region 10's characterization of the SMC and LDD as a single stationary source is inconsistent with the definition of "building, structure, facility, or installation" in 40 CFR 52.21(b)(6). PotlatchDeltic further contends that treating the SMC and LDD as a single stationary source will have negative consequences for future projects subject to New Source Review. PotlatchDeltic presents information regarding the distance between the SMC and LDD as well as the number of intervening property owners to support its position that the SMC and LDD are separate stationary sources.

Response:

For the following reasons, EPA Region 10 agrees with PotlatchDeltic with respect to condition 1 and has revised the permit and statement of basis accordingly. The SMC and LDD are separate major sources as that term is defined in 40 CFR 71.2 and CAA Section 112(a)(1). Region 10 does not agree that revisions to conditions 4.15 or 4.16 are warranted because these conditions as written reflect the language from 40 CFR 52.21(r)(6).

Given that EPA is issuing a Part 71 permit, EPA's source determination analysis here is limited to the definition of "major source" in 40 CFR 71.2 and CAA Section 112(a)(1). EPA notes that this Part 71 permit is not the appropriate context for making source determinations under EPA's or Idaho's new source review permit programs.[3] Idaho or EPA will make source determinations under the appropriate new source review regulations based on the facts at the time of the new source review permit application. EPA recognizes, however, that the term "major source" in 40 CFR 71.2 and the phrase "building, structure, facility, or installation" in 40 CFR 52.21(b)(6) are materially similar.

The term "major source" is defined at 40 CFR 71.2 to mean in part: "any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person (or persons under common control)), belonging to a single major industrial grouping and that are described in paragraph (1), (2), or (3) of this definition."

[3] *See* In the Matter of Coyote Station Power Plant, Mercer County, North Dakota Permit No. T5-F84011, Renewal No. 4, Petition Nos. VIII-2019-1 & VIII-2020-8, Order Responding to Petitions Requesting Objection to the Issuance of Title V Operating Permit, January 15, 2021, at 12-13.

The term "stationary source," in turn, is defined at 40 CFR 71.2 to mean "any building, structure, facility, or installation that emits or may emit any regulated air pollutant or any pollutant listed under section 112(b) of the Act."

The term "major source" is also defined at 40 CFR 71.2 to mean in part a "major source under section 112 of the Act, which is defined as:

> (i) For pollutants other than radionuclides, any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, in the aggregate, 10 tpy or more of any hazardous air pollutant which has been listed pursuant to section 112(b) of the Act, 25 tpy or more of any combination of such hazardous air pollutants, or such lesser quantity as the Administrator may establish by rule."

Applying the definition of major source in 40 CFR 71.2 and CAA Section 112(a)(1) to the SMC and LDD indicates that they are separate sources. Both the SMC and LDD are part of the same industrial grouping and are under the control of the same person, i.e., PotlatchDeltic; PotlatchDeltic does not appear to argue otherwise. However, PotlatchDeltic argues that the SMC and LDD are neither contiguous nor adjacent and therefore the two properties do not constitute a single stationary source. Prior to November 26, 2019, EPA interpreted the term "adjacent" in 40 CFR 71.2 (and 40 CFR 52.21(b)(6)) to take into consideration the "functional interrelationship" between two noncontiguous facilities.[4] On November 26, 2019, EPA issued new guidance making clear that agencies should focus exclusively on proximity when considering whether properties are adjacent (hereafter "2019 Adjacency Guidance").[5] EPA stated in the 2019 Adjacency Guidance: "EPA interprets the term 'adjacent' to entail physical proximity, and the perceived 'functional interrelatedness' of the polluting-emitting activities is not a relevant consideration in this inquiry."[6] EPA clarified that properties need not be touching to be "adjacent," but they need to be close to, next to, lying near, not distant, or nearby each other, following the dictionary definition of "adjacent." EPA further clarified that "adjacent" includes properties that "are to some degree separated by a right of way or other type of similar intervening property—but that are otherwise in reasonable proximity to one another."[7]

EPA stated in the 2019 Adjacency Guidance that permitting authorities should apply the interpretation from November 26, 2019 forward when those authorities "are for the first time assessing the relevant facts and circumstances governing whether a given set of activities should be considered a single source for the purposes of NSR and Title V."[8] The 2019 Adjacency Guidance also stated that "EPA expects that it would not be necessary for permitting authorities to revisit prior source determinations based solely on a change in an EPA policy or interpretation. . . . [h]owever, there may be circumstances where it could be appropriate (and not

[4] November 26, 2019, Memorandum from Anne L. Idsal, Acting Assistant Administrator, to Regional Administrators, Region 1-10, Interpreting "Adjacent" for New Source Review and Title V Source Determinations in All Industries Other Than Oil and Gas at 2.
[5] *Id.*
[6] *Id.* at 7.
[7] *Id.* at 7.
[8] *Id.* at 9.

unduly burdensome) for a permitting authority to re-evaluate a prior source determination, such as where relevant facts change that impact whether the three criteria are met."[9]

Region 10 has reviewed the history of the source determination for the SMC and LDD and has determined that it is appropriate and not unduly burdensome to re-evaluate the prior source determination. EPA's source determination in the statement of basis is based on determinations made by the State of Idaho in 1996 and 1997. Idaho's source determination is found in two letters included in the Administrative Record: an October 9, 1996 letter from Martin Bauer, Chief Air Quality Permitting Bureau, Idaho Department of Health and Welfare, Division of Environmental Quality to John A. Emery, Potlatch Corporation[10] and a February 6, 1997 letter from Lisa K. Kronberg to Susan J. Flieder re Potlatch Corporation Air Quality Operating Permits.[11]

In the October 9, 1996 letter, Idaho states in part: "Because the lumber drying site accepts only lumber from Potlatch's St. Maries Mill, DEQ has determined the St. Maries facility, including the Lumber Drying Division, is one facility." In the February 6, 1997 letter, Idaho states in part: "In determining whether sources are on contiguous or adjacent properties, EPA has noted that . . . [a] Key factor is the degree of interdependence between the two adjacent sites." (emphasis in original). Idaho goes on to state: "It is IDEQ's understanding that all lumber dried at the St. Maries Lumber Drying is received from the St. Maries Lumber Complex and then returned to the St. Maries Lumber Complex for further processing. Thus, although the St. Maries Lumber Complex and the St. Maries Drying Facility are two (2) miles apart, because they appear to be completely interdependent, they meet the contiguous and adjacent requirement for both NSR/PSD and title V major source determinations."

Thus, Idaho's historic source determination rested significantly, if not exclusively, on EPA's now outdated guidance that functional interrelatedness was a key factor in determining whether two facilities are adjacent. As articulated in the 2019 Adjacency Guidance, functional interrelatedness is no longer an appropriate factor to consider when determining adjacency. A definitive source determination under Title V will provide clarity to the permittee, the State of Idaho, and EPA. Given that Idaho made the initial source determinations for the SMC and LDD, on February 26, 2025, EPA Region 10 consulted with the Idaho Department of Environmental Quality regarding this source determination for the SMC and LDD. The EPA's source determination for the SMC and LDD is summarized below:

The SMC and LDD are located 2.2 miles apart by road and 1.26 miles as the crow flies (i.e., in a straight line). PotlatchDeltic provided property records for Benewah County that indicate that 23 land parcels are located between the SMC and LDD using the straight-line approach. We also note that using the straight-line approach, the SMC and LDD are separated by the St. Joe River and St. Maries River. Based on this information, the SMC and LDD are clearly not "contiguous" as that term is used in the definition of "major source" in 40 CFR 71.2. Nor are the facilities nearby, close to, or next to each other. The SMC and LDD are separated by more than just a right of way or single intervening property. Rather, multiple properties and land features divide the

[9] *Id.*
[10] Document 7a in the Administrative Record.
[11] Document 7c in the Administrative Record.

SMC and LDD. These facts indicate that the properties are not in physical proximity to each other. Thus, the facilities are not "adjacent" as that term is used in the definition of "major source" in 40 CFR 71.2. For the same reasons that EPA has determined that the two facilities are neither "contiguous" nor "adjacent", we find that they are not a "group of stationary sources located within a contiguous area" for the purposes of the term "major source" under Section 112(a)(1) of the Act. Therefore, EPA considers the SMC and LDD as separate major sources under 40 CFR 71.2 and CAA Section 112(a)(1).

2.2. Sufficiency Monitoring under 40 CFR part 71

Commenters: B; H; I; Q2; P; S

Permit Conditions: Numerous

Comments: Many commenters questioned EPA's authority to add monitoring, recordkeeping, and reporting conditions in the Title V permit beyond the requirements in the Boiler MACT.

Response:

While EPA has made significant revisions to the draft Permit based on the comments, EPA is providing the following summary of its authorities and obligations under CAA Section 504(c) and 40 CFR 71.6(c)(1).

Congress added Title V to the Clean Air Act as part of the 1990 amendments.[12] Congress's intention with the Title V permitting program was primarily to provide agencies with a tool to aid implementation and enforcement of existing CAA requirements and not as a program to establish new substantive requirements.[13] The most notable exception to this general premise is that Title V permits must include "compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit."[14] In *Sierra Club v. EPA*, the United States Court of Appeals for the District of Columbia Circuit vacated a 2006 EPA rule that prohibited states and local permitting authorities from supplementing monitoring in underlying applicable requirements.[15] Interpreting Section 504(c), the D.C. Circuit stated: "Fundamental to this scheme is the mandate that '[e]ach permit . . . shall set forth . . . monitoring . . . requirements to assure compliance with the permit terms and conditions.' 42 U.S.C. § 7661c(c). By its terms, this mandate means that a monitoring requirement insufficient 'to assure compliance' with emission limits has no place in a permit unless and until it is supplemented by more rigorous standards."[16]

In its comments, PotlatchDeltic presents a four-step process it contends is the correct process for assessing the monitoring, recordkeeping, and reporting requirements in underlying applicable

[12] 104 Stat. 2399, Pub. L. 101-549 (1990).
[13] *See Envtl. Integrity Project v. EPA*, 969 F.3d 529, 536 (5th Cir. 2020) (citing numerous other cases that embody this principle); 56 Fed. Reg. 21712, 21713–14, 21729–30 (May 10, 1991); 57 Fed. Reg. 32250, 32251 (July 21, 1992).
[14] CAA Section 504(c), 42 U.S.C. § 7661c(c), 40 C.F.R. 70.6(c)(1), and 40 C.F.R. 71.6(c)(1).
[15] 536 F.3d 673, 680 (2008).
[16] *Id.* at 677.

requirements when writing Title V operating permits. Under PotlatchDeltic's conception, the permitting authority has no authority to assesses the sufficiency of monitoring, recordkeeping, and reporting in the underlying applicable requirement pursuant to CAA section 504(c) and 40 CFR 70.6(c)(1) and 71.6(c)(1) if (1) the applicable requirement is from a post-1990 NSPS or NESHAP (or is from the Acid Rain Program), (2) is subject to CAM, or (3) is subject to gap-filling under 40 CFR 71.6(a)(3)(i)(B). For the following reasons, PotlatchDeltic's proposed four-step process is incorrect. Nothing in CAA section 504(c) and 40 CFR 70.6(c)(1) and 71.6(c)(1)[17] specify such limitations. On the contrary, such limitations, which exclude certain monitoring requirements in title V permits from review, appear inconsistent (or at least at odds) with the Court's emphasis in *Sierra Club* of the Congressional mandate under CAA Section 504(c) that "'[e]very one' of the permits issued by permitting authorities include adequate monitoring requirements."[18]

PotlatchDeltic does not cite any statutory or regulatory provision specifying its four-step process or the flow chart summarizing it in Figure 2 of its comments. Rather, as support for its four-step process, PotlatchDeltic cites from EPA's statements across various Federal Register notices—none of which mandate or recommend PotlatchDeltic's four-step process. Rather, in these notices EPA stated its intention to include enhanced monitoring in future NSPS and NESHAP standards.[19] PotlatchDeltic also cites to a 1999 D.C. Circuit Court decision in *Natural Resources Defense Council v. EPA* as authority for its contention. *NRDC v. EPA* regarded a challenge to EPA's 1997 CAM Rule. In that decision, the D.C. Circuit affirmed in part the Rule.[20] The Court rejected multiple arguments from NRDC, including an argument that EPA's exception of certain major sources (e.g., those subject to post-1990 NESHAPs) from the CAM rule was inconsistent with the CAA. The Court held that excepting certain major sources from the CAM rule does not violate Section 114(a)(3) of the CAA because EPA's overall monitoring program would ensure that all major sources would have sufficiently enhanced monitoring.[21] The Court explicitly recognized that all major sources are subject to the fundamental requirements in 40 C.F.R. 70.6(c)(1).[22]

We acknowledge that EPA has committed to including enhanced monitoring in all post-1990 NESHAPs. EPA stands by these commitments. Permitting authorities may presume that post-1990 NESHAPs contain sufficient monitoring, recordkeeping, and reporting requirements and may tailor their review of the sufficiency of such requirements accordingly.[23] However, Title V

[17] As the D.C. Circuit noted in *Sierra Club*, 546 F.3d. at 675, these regulatory provisions closely track the language in CAA section 504(c).
[18] *Sierra Club*, 546 F.3d at 678.
[19] Brief for Respondent, NRDC v. EPA, No. 97-1727, (D.C. Cir. May 10, 1999) at 12, 36-37; 57 FR 32250, 32278 ("Any Federal standards promulgated pursuant to the Act amendments of 1990 are presumed to contain sufficient monitoring and, therefore, only § 70.6(a)(3)(i)(A) applies"); 58 FR 54648, 54651 ("With respect to emissions units subject to new hazardous air pollutant requirements under amended section 112 of the Act, EPA will include appropriate enhanced monitoring requirements as part of those new hazardous air pollutant requirements."); 62 FR 54900, 54904 ("In addition, EPA is committed to developing new emission standards subsequent to the 1990 Amendments with methods specified for directly determining continuous compliance whenever possible, taking into account technical and economic feasibility, and other pertinent factors.").
[20] *NRDC v. EPA*, 194 F.3d 130, 132 (D.C. Cir. 1999).
[21] *Id.* at 135; 137.
[22] *Id.* at 136.
[23] *See* 57 FR 32250, 32278.

permits remain subject to the fundamental requirement that all Title V permits must contain monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the terms and conditions of the permit.

EPA Region 10 acted consistent with this requirement in its review of the monitoring, recordkeeping, and reporting requirements in the underlying applicable requirements in the draft permit, including requirements from the Boiler MACT. In the case of the Boiler MACT, the underlying applicable requirements at issue consist of particulate matter (PM) (as a surrogate for metal HAPs) and CO (as a surrogate for organic HAPs) emission limits.[24] The Boiler MACT requires that biomass boilers (like PB-1 and PB-2) that use an ESP to reduce PM emissions to comply with a PM limit (that elect not to use a PM CPMS or PM CEMS) continuously monitor the opacity of emissions exiting the exhaust stack using a COMS.[25] EPA discussed the theory behind using opacity as an indicator of PM emissions in the statement of basis (SOB).[26] With respect to CO, in the Boiler MACT EPA selected oxygen (O2) as an indicator of CO emissions due to the relationship between oxygen and carbon monoxide in combustion.[27]

Consistent with the presumption that post-1990 NESHAPs contain sufficient monitoring, EPA did not proactively review the sufficiency of the monitoring, recordkeeping, and reporting in the Boiler MACT. However, as explained in the SOB, EPA observed that source testing specific to PB-1 and PB-2 indicated that opacity was not well correlated with PM emissions for these boilers. Likewise, source testing indicated that PB-1 and PB-2 did not exhibit EPA's expected relationship between O2 in the combustion chamber and CO emissions.[28] EPA included the data specific to PB-1 and PB-2 in the proposed SOB.

In light of these data, EPA could not reasonably conclude that compliance is assured for these two boilers with respect to the PM and CO limits in the Boilers MACT. Ignoring these facts would be inconsistent with CAA Section 504(c) and 40 CFR 71.6(c)(1) that "'[e]very one' of the permits issued by permitting authorities include adequate monitoring requirements."[29] In order to ensure the Title V permit for the SMC met these statutory requirements, EPA included in the draft permit supplemental ESP parameter monitoring, recordkeeping, and reporting requirements. EPA also included supplemental CO measurements. EPA made clear in the proposed SOB and reiterates here that EPA's decision to supplement the monitoring in the Boiler MACT is predicated on information specific to PB-1 and PB-2. Broadly speaking, the EPA does not believe that these datasets on just two specific boilers and associated control equipment render the monitoring requirements in the Boiler MACT inadequate to assure compliance with the rule's standards.

[24] Permit Conditions 5.5.3-5.5.6; 40 CFR 63.7500(a)(1), (f), 7505(a) and (c), and Tables 2 and 15 to 40 CFR 63, Subpart DDDDD.
[25] Permit Condition 5.16; 40 CFR 63.7525(c) and Rows 1.a and 1.b to Table 8 of 40 CFR 63, Subpart DDDDD.
[26] Draft SOB at pp. 44-47 (opacity) and 50 (oxygen).
[27] *Id.*
[28] As discussed in section 3.2.2, below, EPA's initial understanding of the relationship between CO and O2 in biomass boilers articulated in the draft statement of basis was incorrect. EPA has removed proposed conditions from the permit predicated on these misunderstandings and corrected the final statement of basis.
[29] *Sierra Club*, 546 F.3d at 678.

As discussed further in section 3.2, below, the commenters have provided substantial information on the suite of proposed supplemental monitoring, recordkeeping, and reporting to assure PB-1's and PB-2's compliance with the Boiler MACT PM and CO emission limits. EPA's consideration of the commenters' information is discussed further below for each applicable condition. In short, based on EPA's consideration of this information, EPA is removing all supplemental monitoring related to the Boiler MACT CO emission limits and all but one requirement related to the Boiler MACT PM emission limits. No supplemental monitoring is necessary to assure compliance with the Boiler MACT CO emission limits. EPA is finalizing one recordkeeping requirement that is necessary to assure compliance with PM emission limits in the Boiler MACT applicable to PB-1 and PB-2, consistent with the requirements of 40 CFR 71.6(c)(1) and CAA Section 504(c).

2.3. Part 71 Permits Issued by Regions other than Region 10

Commenters: Q2

Permit Conditions: N/A

Comments: In its comments, PotlatchDeltic cites to three permits issued by our sister Regions as support for its contention that EPA is not authorized to supplement the monitoring, recordkeeping, and reporting in post-1990 NESHAPs.

Response:

PotlatchDeltic's depiction of these permits and associated permitting records is inaccurate and does not persuade Region 10 that its approach to writing Title V permits is inconsistent with the CAA nor materially different than our sister Regions.

Region 9: Desert View Power, LLC – Permit No. CB-ROP 05-01

PotlatchDeltic cites to this permit as support for its contention that EPA does not have authority to supplement monitoring, recordkeeping, and reporting in post-1990 NESHAPs. PotlatchDeltic also commented that EPA Region 10 acted arbitrarily in not including a permit shield similar to the one Region 9 included in the Title V Permit for Desert View Power. Region 10 disagrees with PotlatchDeltic on both points. On September 30, 2020, EPA Region 9 issued a Title V permit to Desert View Power, LLC to operate its biomass power plant located on the Cabazon Reservation. The Desert View Power facility includes two 300 million BTU/hr circulating fluidized bed boilers. The facility employs a fabric filter baghouse for PM control. No post-combustion controls are employed to reduce CO emissions. The Title V permit incorporates applicable requirements from a PSD permit and the Boiler MACT.

Condition II.A.10 incorporates the CO BACT emission limit of 231 ppmdv @ 3 percent O2, 3-hour average from the PSD permit. Condition II.A.11 incorporates the CO emission limit of 310 ppmdv @ 3 percent O2, 30-day rolling average from the Boiler MACT. The emission limit from the PSD permit is more stringent numerically and with respect to averaging time. The PSD permit requires the permittee to demonstrate continuous compliance with the CO BACT limit

through use of a CO/O2 CEMS (enabling correction to 3% O2). Use of a CEMS is the most robust monitoring possible to demonstrate continuous compliance with an emission limit. We would not expect Region 9 to review the sufficiency of the CO monitoring, recordkeeping, and reporting of the Boiler MACT because the underlying PSD permit requires use of a CO CEMS.

Condition II.A.4 incorporates the PM10 (filterable and condensable particulate) emission limit of 0.006 gr/dscf at 12% CO2 from the PSD permit. Condition II.A.7 incorporates the opacity limit from the PSD permit, specifically: "The Permittee shall not discharge or cause the discharge into the atmosphere from the boiler exhaust stack gases which exhibit an opacity of 10 percent or greater for any period or periods aggregating more than three minutes in any one hour." Condition II.A.6 incorporates the filterable PM emission limit of 0.11 lb/mmBtu from the Boiler MACT which is approximately one order of magnitude greater than the PSD PM10 BACT limit. Condition II.A.8 incorporates the daily block average opacity operating limit (test-derived value but not less than 10 percent opacity) from the Boiler MACT.

Conditions II.C.9, 18, and 20 require the permittee to install and operate a COMS.

Condition II.C.24 incorporates Compliance Assurance Monitoring provisions required by 40 CFR part 64. Specifically, the condition requires CAM for conditions II.A.4 and II.A.7. CAM for these conditions is to continuously measure opacity with a COMS and to require corrective action when the hourly average exceeds 7.5%. In addition, Condition II.C.25 requires the permittee to inspect the interior and exterior of the fabric filters for evidence of damage or leaks.

The final Statement of Basis for the permit indicates that the permittee conducted a correlation study which consisted of source test measurements of PM10 performed concurrent with opacity measurements from the COMS. The test results indicated an average PM10 emission rate of 0.00049 gr/dscf (against a limit of 0.006 gr/dscf) correlated to an average opacity level of 2.75%. Based on this information, Region 9 set an hourly excursion threshold of 7.5% opacity.

II.H Permit Shield states: Compliance with "Conditions II.A.7, II.C.18, II.C.24, II.D.4 and II.D.9 of this permit shall be deemed compliance with Subpart DDDDD Table 4 - Operating Limits for Boilers and Process Heaters, Item No. 3; Table 7 - Establishing Operating Limits, Item No. 1c.; and Table 8 - Demonstrating Continuous 32 Compliance, Item 1. The EPA warrants that all applicable Subpart DDDDD, Table 4, Item 3 requirements are specifically included and identified in this permit."

Region 9 explained the rationale for the permit shield in the statement of basis. Region 9 identified that the Conditions II.A.4 (PSD grain-loading standard) and II.A.7 (PSD opacity standard) in conjunction with the CAM requirements and associated reporting were more stringent than the Boiler MACT opacity limits. Therefore, Region 9 determined that compliance with the more stringent emissions and opacity limits is appropriately deemed compliance with the Boiler MACT opacity limits. The SMC is not subject to a more stringent opacity limit than the limit in the Boiler MACT nor any CAM requirements, as neither biomass boiler at SMC is a "large pollutant-specific emission unit" required to comply with CAM at the time of the initial title V permit. Thus, there is no need to streamline the compliance requirements in a similar fashion as Region 9.

The situation with Desert View Power is distinguishable from the SMC both legally and factually. Legally, Desert View Power is subject to conditions from a PSD permit, including a grain loading standard and an opacity limit that is more stringent than the Boiler MACT opacity limit. These conditions are subject to CAM. The boilers at SMC are subject to a much less stringent FARR PM standard and are only subject to the opacity limit in the Boiler MACT. Moreover, CAM does not apply to the PM or opacity limits applicable to the SMC boilers at this time, as stated above. Factually, the boilers at Desert View Power are used to generate electrical power (this implies steady-state operation with minimal load variation) and are controlled by a relatively static baghouse (as compared to a dynamic ESP controlled by an automatic voltage controller that adjusts voltage applied based on variable exhaust gas characteristics). Desert View Power conducted a correlation study to demonstrate a relationship between opacity and PM10. Region 9 found this study reliable and used it as a basis to set an opacity-based excursion threshold to satisfy CAM at 7.5%, hourly average. This is materially different from the industrial process variable load boilers at SMC that are controlled using ESPs and for which Region 10 lacks information indicating a correlation between opacity and PM. Moreover, we would not expect Region 9 to review the sufficiency of the monitoring, recordkeeping, and reporting of the Boiler MACT PM or opacity limits given that the PSD permit and associated CAM requirements imposed a more stringent emission limit, operational standard (shorter averaging time and lower opacity value) and more robust monitoring, recordkeeping and reporting than the Boiler MACT.

Region 8: Deseret Generation and Transmission Co-operative – Bonanza Power Plant – Permit No. V-UO-000004-2019.00

PotlatchDeltic cited to this permit issued by EPA Region 8 as an indication that EPA Region 8 did not question the sufficiency of the monitoring, recordkeeping, and reporting of the Boiler MACT and thus as support for its contention that EPA lacks authority to do so. On December 17, 2024, EPA Region 8 issued a Title V permit renewal to Deseret Generation and Transmission Co-operative for the Bonanza Power Plant. Bonanza is an approximately 500 megawatt (MW) gross, coal fired electric generating unit (EGU). The source consists of a single boiler, auxiliary boiler and associated engines and equipment. The power plant uses an Ecolaire baghouse for particulate control, a Combustion Engineering wet scrubber for SO2 control and low-NOx burners for NOx control. The source employs SO2 and NOx continuous monitors. Opacity is measured in the two ducts between the baghouses and the induced draft fans upstream of the wet scrubber. The opacity monitors are located in the ductwork because the stack is a wet stack. Data from the two opacity monitors are averaged to report the stack opacity.

Section VIII of the permit incorporates applicable requirements from the Federal PSD permit issued to the source on February 2, 2001. These applicable requirements include a filterable PM emission limit of 0.0297 lb/MMBtu and the filterable PM10 emission limit of 0.0286 lb/MMBtu at the main boiler (Unit 1). CAM applies to these limits. Accordingly, the permit incorporates CAM indicators. Indicator #1 requires the permittee to monitor the number of baghouse compartments in service. Indicator #2 requires the permittee to install a PM CEMS and continuously monitor PM emissions. Section V of the permit incorporates applicable requirements from the NESHAP for Coal and Oil Electric Utility Steam Generating Units (40

CFR part 63, subpart UUUUU). Condition V.11 incorporates the NESHAP requirement to install a CEMS, PM CPMS and sorbent trap monitoring systems.

Given that the permit requires CEMS for NOx, SO, and PM through the NESHAP and CAM, we would not expect Region 8 to conduct a sufficiency review of the monitoring, recordkeeping, or reporting in the underlying applicable requirements. We also note that Region 8 included supplemental testing requirements in Section IX entitled "Compliance Assurance." Region 8 stated: "Requirements in this Section IX have been developed under authority of 40 CFR 71.6(c)(1), to provide for reasonable assurance of compliance with Section VIII of this permit, and do not constitute a CAM plan under the Compliance Assurance Monitoring Rule (Part 64). These requirements are in addition to requirements of Part 64 and Section VIII of this Permit." We note that the conditions in Section IX are substantially similar to Conditions 3.22 through 3.30 of the draft permit for the SMC. In addition, in response to comments, Region 8 stated: "The EPA evaluated Bonanza's permit terms and determined that the permit renewal includes monitoring, compliance certification, and reporting requirements sufficient to assure compliance with the terms and conditions of the permit. The Statement of Basis for the EPA's proposed permit renewal includes additional information regarding the permit terms and underlying air requirements." We read the Permit and this statement as a clear indication that Region 8 understood that all EPA-issued title V permits must comply with 40 CFR 71.6(c)(1).

Region 6: SPOT Terminal Services, LLC Deepwater Port – Permit No. R6T5-DWP-GM7

Similar to the permit issued to Deseret Generation and Transmission Co-operative, PotlatchDeltic cites to this permit issued by Region 6 as further evidence that EPA does not have authority to review the sufficiency of monitoring, recordkeeping, and reporting in post-1990 NESHAPs. On August 30, 2023, EPA Region 6 issued a Title V permit to SPOT Terminal Services LLC to operate a Deepwater Port in the Gulf of Mexico. The primary function of the source is to provide crude oil loading service to fill and directly load Very Large Crude Carriers. Region 6 processed the Title V application concurrently with the PSD application. Accordingly, the Title V permit incorporates applicable requirements from the PSD permit. The source is subject to, inter alia, 40 CFR part 60, subpart IIII (Compression Ignition Internal Combustion Engines) 40 CFR part 63, subparts Y (Marine Tank Vessel Loading Operations) and ZZZZ (Stationary Reciprocating Internal Combustion Engines).

The PSD permit authorizes the installation of seven diesel engines of various sizes and duty. As evidenced in Section VII.C and D of the statement of basis, Region 6 performed a VOC, NOx, and CO (three of the four pollutants for which NSPS subpart IIII develops "g/hp-hr" emissions standards) BACT analysis to determine the emission limit or work practice standard the engine must achieve. In that analysis, Region 6 also determined how compliance would be demonstrated. In its analysis, Region 6 considered the requirements of 40 CFR part 60, subpart IIII applicable to the engines. Both SPOT (DFP1 & DFP2) and SMC (EU-5's IC-1 & IC-2) employ firewater pump engines in the event of emergency. For the SMC permit, Region 10 determined that recordkeeping supplementation was necessary to assure compliance with two underlying NSPS subpart IIII requirements applicable to two firewater pump engines. The recordkeeping requirements in Condition 8.9 in Region 10's permit authorized under 40 CFR 71.6(c)(1) assures compliance with underlying NSPS subpart IIII requirements in Conditions

8.4.1 and 8.4.3. Region 6 apparently did not determine supplementation of NSPS subpart IIII requirements was necessary for SPOT's two firewater pump engines. We note that PotlatchDeltic did not submit comments requesting Region 10 to change or refrain from finalizing Condition 8.9. We do not take this as an indication that the SPOT permit does not comply with 40 CFR 71.6(c)(1) or that Region 10 acted arbitrarily. The basis for Region 10's supplementation is clearly stated in the statement of basis.

With respect to VOC emissions from the loading operations, the Title V permit incorporates a combination of BACT requirements and requirements from 40 CFR part 63, subpart Y. Specifically, the permit incorporates a requirement to install marine vapor combustion units enriched with propane to achieve a Destruction Removal Efficiency of no less than 95% control. The permit incorporates initial performance testing and continuous monitoring and recordkeeping obligations. With respect to demonstrating continuous compliance, the permit incorporates two alternative methods: continuous temperature monitoring at the exhaust point of the combustion device or VOC CEMS. With respect to monitoring temperature as an indicator of VOC destruction efficiency, Region 6 stated as part of its BACT analysis:

"Vapor Combustion Units (VCU) utilize high combustion temperatures to achieve VOC destruction. The VOC vapors displaced in tanker loading are enriched with propane, as needed, to a minimum of 164 Btu/scf to ensure combustion would be hot enough to destroy the VOCs. The mixture is fed into the combustor, which reaches temperatures at a minimum of 1,200 °F. The vapor combustor is provided with a stack temperature control function. A thermocouple is used to control both the assist gas valve and cooling air dampener to keep the combustion temperature within desired range. The flame for the vapor combustor is completely enclosed, thus reducing radiant heat impacts, noise and visibility of the combustion flame from any viewpoint off the platform."

Thus, Region 6 conducted a thorough review of the VOC controls and associated parametric monitoring and determined that either monitoring temperature or continuously monitoring VOC emissions is sufficient to assure compliance with the VOC emissions limit.

3. NESHAP Subpart DDDDD (Boiler MACT)

3.1. Boiler MACT Performance Testing

3.1.1. Draft condition requiring performance tests at high load and low load

Commenters: B; E1, E2, G; H; I; J; Q2; Q4; T

Permit Condition: 5.10

Comments: Several commenters objected to draft permit condition 5.10.2 requiring the company to perform two separate performance tests at low and high loads. PotlatchDeltic asserted that only one test at maximum load is required under 40 CFR 63.7520(a). PotlatchDeltic inquired as to the consequence of high and low load steam generating rates being relatively close to one another. PotlatchDeltic stated that requiring testing at low and high load results in

schedule confusion. PotlatchDeltic contended that results of extensive Boiler MACT performance testing conducted since 2016 supports discontinuation of testing at both low and high load. Commenters stated that requiring testing at low load prevents PotlatchDeltic from the opportunity to increase the steam generating rate operating limit. PotlatchDeltic stated that operating its boilers at low load to satisfy low load test requirement jeopardizes the reliability and stability of the equipment and creates unsafe conditions. Two other commenters provided general support for testing at conditions that are the most challenging to comply with emission limits.

Response:

The regulation at 40 CFR 63.7520(c) states: "You must conduct each performance test under the specific conditions listed in Tables 5 and 7 to this subpart. You must conduct performance tests at representative operating load conditions while burning the type of fuel or mixture of fuels that has the highest content of chlorine and mercury, and TSM if you are opting to comply with the TSM alternative standard and you must demonstrate initial compliance and establish your operating limits based on these performance tests. These requirements could result in the need to conduct more than one performance test. Following each performance test and until the next performance test, you must comply with the operating limit for operating load conditions specified in Table 4 to this subpart."

While there is nothing in the rule that prohibits requiring more than one annual test based on load, Region 10 has determined that one test per pollutant is adequate for the PotlatchDeltic boiler(s) to demonstrate compliance, and we are not finalizing the proposed two-test requirement. With respect to HCl, Hg, PM, and CO, the Permittee has demonstrated compliance at both high and low loads for the past eight years. Given this record, mandating two performance tests at low and high load is not necessary. See documents 7iii and 7jjj in the administrative record for the performance testing schedule for the immediate future. Pursuant to Conditions 5.10.1 and 5.10.3, EPA will determine the representative operating load at which the Permittee must test PB-1 and PB-2 on a case-by-case basis based on the Permittee's source test plan. If the Permittee expresses intent to reestablish (i.e., increase) steam generating rate operating limit (with respect to pollutants HCl, Hg, PM and CO) in the source test plan, that factor will be influential in determining the representative operating load at which to test given the two-fold purpose of performance testing is to demonstrate compliance and reestablish or confirm operating limits. Whether unsafe conditions would result from boiler operation at a particular steam generating rate would also be an element of the case-specific review. See additional explanation under Condition 5.10 of the SOB. See Section 3.1.2, below, for additional explanation for why Region 10 is not finalizing the two-test requirement.

3.1.2. Consequence of requiring performance tests at high load and low load on ability to install and operate an oxygen trim system

Commenters: Q4

Permit Condition: 5.10.2

Comments: One commenter who objected to proposed condition 5.10.2 stated:

If we used the oxygen trim system compliance option in Boiler MACT which resets after every passing compliance test and since we typically have higher oxygen at low load - how is the facility to be in compliance at higher loads?

Response:

We find this comment compelling.

The Boiler MACT at 40 CFR 63.7525(a)(7) states:

> *Operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test as the operating limit for oxygen according to Table 7 to this subpart.*

EPA defines oxygen trim system at 40 CFR 63.7575 as follows:

> *Oxygen trim system means a system of monitors that is used to maintain excess air at the desired level in a combustion device over its operating load range. A typical system consists of a flue gas oxygen and/or CO monitor that automatically provides a feedback signal to the combustion air controller or draft controller.*

Installation and use of an oxygen trim system on industrial boilers is beneficial for the environment and should be encouraged. EPA states:

> *One process control measure that has been used for ICI boilers is the use of oxygen trim controls. These controls measure the stack oxygen concentration and automatically adjust the inlet air at the burner for optimum efficiency. Manufacturers estimate that a 1 percent thermal efficiency can be achieved using this control.*[30]

Increasing thermal efficiency means lower mass emissions generated per unit of steam generated.

The Boiler MACT requires less frequent boiler tune-ups for boilers that employ oxygen trim systems. See row 1 and 2 of Table 3 to Boiler MACT. Rather than being required to conduct a tune-up every other year, boilers employing an oxygen trim system are required to conduct a tune-up every five years. If an oxygen trim system is employed, the 30-day rolling oxygen operating limit is replaced with the requirement to operate an oxygen trim system with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test. See 40 CFR 63.7525(a)(7) and row 9.a of Table 8 to Boiler MACT.

[30] AVAILABLE AND EMERGING TECHNOLOGIES FOR REDUCING GREENHOUSE GAS EMISSIONS FROM INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS. EPA Office of Air and Radiation. October 2010.

Requiring low load testing pursuant to 40 CFR 63.7520(a) of the Boiler MACT discourages (perhaps even prevents) PotlatchDeltic from installing an oxygen trim system. The commenter is correct that O2 exhaust gas content is generally highest at low steam generating rates. See Appendix C to statement of basis for summary of O2 content during Boiler MACT source testing conducted February 2016 through June 2024. Currently, the lowest source test average O2 content measured during the most recent source test is 7.3% for PB-1 and 5.9% for PB-2. The most recent source tests were conducted under high load conditions in June 2024.

Because greatest amounts of excess air are needed to support combustion at low steam generating rates, exhaust gas O2 content will likely be too high (during testing at low load) to be used as an oxygen trim system set point when the boiler operates at the more typical higher steam generating rates. See scatter plots of daily average steam generating rates for 26-month period in the SOB. PotlatchDeltic approached Region 10 more generally about O2 trim system in November 2023. Given the Permittee's interest in installing an O2 trim system and this comment, Region 10 has removed Condition 5.10.2 mandating low and high load testing. Region 10 will also consider the potential detrimental environmental effect of requiring low load testing under Boiler MACT authority as it considers the representative load conditions in source test plans under 40 CFR 63.7520(a).

Anticipating the Permittee may choose to install and operate an oxygen trim system, Region 10 has included in the final permit requirements applicable to boilers employing an oxygen trim system.

3.1.3. Applicability of General Stack Testing Requirements

Commenters: Q2

Permit Condition: 3.22 – 3.30

Comments: The commenter objected to general testing requirements applying to Boiler MACT testing. Boiler MACT requirements are correctly incorporated in Section 5 of the Proposed Permit. The commenter also stated, additional requirements in Conditions 3.23 through 3.30, as applied to Boiler MACT testing pursuant to Condition 3.22, are unauthorized; EPA Region 10 does not identify the way in which the MACT language is deficient for assuring compliance with emission standards, nor does it provide any explanation how the more stringent requirements will assure compliance. With respect to the requirement in Condition 3.27, the commenter states that reference to "regular operating staff" is unacceptably ambiguous.

Response: With the exception of Condition 3.27, EPA agrees to no longer require Boiler MACT testing conform to requirements in Conditions 3.23 through 3.30. See Condition 3.22 for requirement that Boiler MACT testing conform to Condition 3.27 in order for the testing to generate a representative result. Condition 3.27 is one of several general testing requirements that Region 10 as well as other EPA Regions have determined are necessary to ensure tests are conducted under representative conditions. The Boiler MACT at 40 CFR 63.7520(a) states "You shall conduct all performance tests under such conditions as the Administrator specifies to you

based on the representative performance of each boiler or process heater for the period being tested." Consistent with 40 CFR 63.7520(a), EPA is specifying in the permit this condition to ensure the tests are conducted based on the representative performance of each boiler. See Section 2.3, above, regarding Deseret Generation and Transmission Co-operative – Bonanza Power Plant – Permit No. V-UO-000004-2019.00 issued by Region 8. This permit includes a condition identical to Condition 3.27. Region 10 has revised Condition 3.22 to avoid inconsistencies with the Boiler MACT testing requirements. Reference to "regular operating staff" in Condition 3.27 means PotlatchDeltic employees under the supervision of the Boiler Supervisor regularly tasked with operating the boiler.

3.2. Boiler MACT Sufficiency Monitoring

Commenters: A; B; D; F; G; H; I; J; L; N; O; P; Q1-Q4; R; S; T; U

3.2.1. Particulate Matter

Permit Conditions: 5.11, 5.12. 5.13, 5.14.4, 5.14.5, 5.15, 5.19 (except 5.19.4), 5.20, 5.21, 5.22.3.1, 5.22.3.3, 5.22.3.4, 5.22.4, 5.22.10, 3.48.1.5, 3.48.2.4 and 3.49.1.3.

Comments:

Several commenters objected to EPA's proposed conditions 5.11, 5.12. 5.13, 5.14.4, 5.14.5, 5.15, 5.19 (except 5.19.4), 5.20, 5.21, 5.22.3.1, 5.22.3.3, 5.22.3.4, 5.22.4, 5.22.10, 3.48.1.5, 3.48.2.4 and 3.49.1.3. These conditions are summarized in the bullets below for reference. These proposed conditions included requirements to monitor, record, and report based on ESP parameters, such as secondary voltage and secondary current. The commenters objected on various grounds, including that parametric monitoring of this nature is not reliable or appropriate for biomass boilers.

- 5.11: ESP Inspection and Maintenance Recordkeeping
- 5.12: ESP Air Load Testing
- 5.13: ESP Gas Load Testing
- 5.14.4: A requirement to calculate and record secondary voltage and current daily for each field of the ESP.
- 5.14.5: A requirement to calculate the difference in daily block average secondary current between two contiguous ESP fields recorded daily (milliamps).
- 5.15: ESP secondary voltage and current excursion thresholds.
- 5.19 (except 5.19.4): Requirement that ESP Secondary Voltage and Current Monitoring meet NESHAP Subpart DDDDD CPMS requirements.
- 5.20: A requirement to develop a site-specific monitoring plan for ESP secondary voltage and current.
- 5.21: A requirement to monitor and collect ESP secondary voltage and current data utilizing CMS according to a monitoring plan and according to various requirements.
- 5.22.3.1, 5.22.3.3, 5.22.3.4, 5.22.4, 5.22.10: Various ESP recordkeeping requirements.

- 3.48.1.5: A deviation means a situation in which an excursion (as defined in Condition 5.15) occurs.
- 3.48.2.4: Deviation reporting of excursions from the thresholds set in Condition 5.15.
- 3.49.1.3: Annual compliance certification reporting for excursions from thresholds set in Condition 5.15.

Summary of Responses:

For the reasons discussed below, EPA is retaining Condition 5.11 and removing proposed Conditions 5.12, 5.13, 5.14.4, 5.14.5 and 5.15. EPA is also removing the reference to Condition 5.15 from proposed Condition 3.48.1.5 (and by extension Condition 3.48.2.4) and 3.49.1.3. EPA is also removing the requirements from proposed Conditions 5.19, 5.20, 5.21, 5.22.3.1, 5.22.3.3, 5.22.3.4, and 5.22.4 that extended Boiler MACT CPMS and recordkeeping requirements to systems used to monitor secondary voltage and current. EPA is removing proposed Condition 5.22.10 due to unnecessary duplication of requirement in Condition 5.11. EPA is also clarifying requirements under Condition 3.46.

3.2.1.1. Condition 5.11: ESP Maintenance and Inspection Recordkeeping

Comments:

With respect to Condition 5.11, some commenters disputed EPA's characterizations in the statement of basis regarding the expected relationship between opacity and PM. These commenters intimated that opacity is not a reliable indicator of PM emission and that EPA selected it nonetheless based on reasonable cost, ease of execution, and usefulness of the resulting data.

MACT requirements are correctly incorporated in Condition 5.8 of the Proposed Permit. Additional requirements in Condition 5.11 are unauthorized. EPA Region 10 does not identify the way in which the MACT language is deficient for assuring compliance with emission standards, nor does it provide any explanation how the additional requirements will assure compliance.

Response:

While EPA agrees that it considered costs, ease of execution, and usefulness of the data when selecting COMS as the monitoring method of PM, EPA disagrees with the commenters that opacity is not a reliable indicator of PM, in general. EPA maintains its position articulated in the statement of basis that EPA's expectation when it established continuous opacity monitoring requirements and opacity operating limits in the Boiler MACT was that boilers subject to the applicable Boiler MACT requirements would exhibit the good relationship between opacity and PM emissions that EPA has historically observed.

Importantly, no commenters asserted that inspection and maintenance of the ESP is unnecessary to assure compliance with the Boiler MACT PM limits. On the contrary, commenters indicated that proper inspection and maintenance of the ESP is critical to ensuring the ESP's collection

efficiency. Records of inspection and maintenance of the ESP will inform EPA and the public how the Permittee is maintaining the ESPs to comply with Conditions 5.5 and 5.8. Thus, EPA Region 10's position remains that condition 5.11 assures compliance with conditions 5.5 and 5.8.

Beyond disputing EPA's rationale for selecting opacity as an indicator of PM in the Boiler MACT, none of the commenters directly addressed the opacity and PM data specific to PB-1 and PB-2.

3.2.1.2. Conditions 5.12 and 5.13: Air Load and Gas Load Testing

Comments:

Several commenters objected to draft Conditions 5.12 and 5.13 requiring air load and gas load testing. One commenter, the ESP manufacturer, asserted that conducting air load and gas load testing is not an indicator of ESP performance. Rather, the manufacturer recommends air load testing to ensure nothing is left in the ESP after maintenance. Furthermore, the commenter clarified that the maintenance literature EPA Region 10 cited as the basis for requiring Conditions 5.12 and 5.13 was outdated and that the latest maintenance literature does not require the testing because it does not provide reliable data to indicate the health of the precipitator. The boiler supervisor for PotlatchDeltic commented that conducting monthly gas load testing poses a significant safety hazard due to the requirement to access high voltage cabinets. Collecting data to generate a gas load V/I curve requires overriding the automatic voltage control program. This is not normal and results in higher PM emissions. Air load testing is not necessary as PotlatchDeltic already conducts dead air tests—turning on the ESP prior to it receiving boiler exhaust and observing whether secondary voltage reaches at or near maximums.

Response:

EPA agrees with the commenters and has removed proposed Conditions 5.12 and 5.13.

3.2.1.3. Conditions 5.14.4, 5.14.5, 5.15, 5.19 (except 5.19.4), 5.20, 5.21, 5.22.3.1, 5.22.3.3, 5.22.3.4, 5.22.4, 5.22.10, 3.48.1.5 (and by extension 3.48.2.4), and 3.49.1.3.

Comments:

Many commenters objected to EPA including ESP secondary voltage and current excursion thresholds in condition 5.15 and associated monitoring, recordkeeping and reporting requirements in 5.14.4, 5.14.5, 5.19 (except 5.19.4), 5.20, 5.21, 5.22.3.1, 5.22.3.3, 5.22.3.4, 5.22.4, 5.22.10, 3.48.1.5 (and by extension 3.48.2.4), and 3.49.1.3. First, the commenters construed Condition 5.15 as operating limits, i.e., that the Permittee must maintain secondary voltage and secondary current above the established thresholds. Second, commenters asserted that under EPA's excursion thresholds, normal ESP function would be identified as deviations. Third, the commenters asserted that setting short-term, brightline secondary voltage and current thresholds is inappropriate for biomass boilers.

With respect to the first concern, many commenters read condition 5.15 as setting CAM-like excursion thresholds or even new operating limits. The commenters asserted that this was inappropriate because the Boiler MACT is not subject to CAM and EPA does not have authority to set new operating limits.

With respect to the second concern, commenters asserted that the excursion thresholds in Condition 5.15 were arbitrary because they would lead to many false positives. Specifically, secondary voltage would dip below the excursion threshold as part of normal ESP function.

With respect to the final concern, Commentors pointed out that fuel in wood fired boilers, like the SMC boilers, is not homogeneous. Commentors state that variations in size, moisture, and fuel distribution to the combustion systems yield unpredictable particulate loading in the gas streams. The ESP manufacturer, PPC Industries, commented[31] that ESP automated voltage control systems ensure optimal performance of the ESP under varying gas steam and particulate loading conditions. Short-term fluctuations in ESP secondary voltage and current resulting from variations in airflow, gas stream temperature, particle density, particle resistivity, bulk gas stream resistivity and gas stream moisture do not necessarily mean that the ESP is not working properly.

PotlatchDeltic stated in its comments[32]:

> Operation and maintenance information provided by EPA in the referenced 1985 EPA document, as well as similar information provided by the ESP manufacturer, indicates that, while these parameters (i.e., secondary voltage and secondary current) are useful indicators of individual ESP field performance, their variability, which is dependent on conditions within each individual ESP field (e.g., temperature, moisture, flow rate, chemical compositions of both the exhaust gas and the particulate matter to be collected), makes them ill-suited as indicators that overall performance of a multi-field ESP is good or poor. Instead, trends across all ESP fields and over time with changing conditions are more important indicators that acceptable performance is maintained. For these reasons, EPA and ESP manufacturers recommend that ESP owners and operators measure these parameters as part of a maintenance plan and analyze the collected data (e.g., by periodically conducting air- and gas-load tests and using the data to create V-I curves that can be compared to one another) to characterize the ESP's performance under various conditions and to identify trends that warrant further investigation. The EPA and ESP manufacturers do not recommend that ESP owners and operators identify secondary voltage or secondary current thresholds or trends to be used as "bright line" indicators of poor ESP operation similar to those in EPA Region 10's proposed Condition 5.15.

Similarly, PPC Industries stated:[33] Creating "compliance assurance" excursion thresholds (e.g., not too high, not too low, tailored to the characteristics of the fuel combusted that day) is "nigh impossible" as PPC industry suggests given the "vast number of factors (airflow, gas stream

[31] Comment R.
[32] Comment Q2.
[33] Comment R.

temperature, particle density, particle resistivity's, bulk gas stream resistivity and gas stream moisture) affecting voltage and current."

Response:

In response to these comments, EPA has removed proposed condition 5.15 and associated conditions from the Final Permit. EPA provides the following responses to each aspect of the comments.

With respect to the first concern, the commenters misread proposed condition 5.15. Proposed condition 5.15 was principally a recordkeeping requirement. The sole requirement was for the Permittee to record each instance in which it detected an excursion. Condition 5.15 was not a CAM requirement which would mandate corrective action nor was it an operating limit.

Regarding the second concern, EPA established the voltage thresholds based on a statistical analysis that identified the field-specific secondary voltage that correlated with PM emission limit compliance with a certain level of confidence. Hence, maintaining voltage above the threshold would provide a reasonable assurance of compliance. Region 10 understood that there would be "false positives" of excursion thresholds proposed in the draft permit, but that "false positives" do not necessarily equate to emissions in excess of the PM limit. The intent of identifying an excursion was to prompt the Permittee to consider double-checking to ensure the ESP was working properly. Region 10 however understands the commenters' perspective, based on the language and structure of condition 5.15 "false positives" of CAM-like excursions incorrectly exposes the company to liability from mis-perceived non-compliance with the underlying PM emission limit.

EPA finds the final concern particularly compelling. The commenters have convinced EPA that setting short-term, bright-line ESP excursion thresholds is not appropriate for biomass boilers of the type and nature of PB-1 and PB-2. Having considered these comments, Region 10 has removed conditions 5.14.5 and 5.15, and revised 5.14.4, 5.19, 5.20, 5.21, 5.22, 3.48.1.5 (and by extension 3.48.2.4) and 3.49.1.3 accordingly.

An underlying minor NSR permit already requires the Permittee to continuously measure and record hourly key ESP parameters. As the Permittee states in its comments to Region 10 on page 96, "EPA and ESP manufacturers recommend that ESP owners and operators measure these parameters as part of a maintenance plan and analyze the collected data . . . to characterize the ESP's performance under various conditions and to identify trends that warrant further investigation." Likewise, condition 3.46 already incorporates the requirement in 40 CFR 71.6(a)(3)(iii)(A) for the permittee to submit semi-annual monitoring reports.

3.2.2. Carbon Monoxide

Permit Conditions: 5.14.8 and 5.23

Comments: Many commenters objected to proposed Condition 5.14.8 requiring monthly CO measurements on PB-1 and PB-2. Commenters Q1-Q4 noted that the requirement would be

unsafe for PotlatchDeltic employees to implement. Many commenters noted that monthly 60-minute CO measurements with a portable CO monitoring device would not provide a representative measurement of CO emissions as CO emissions from biomass-fired boilers, especially ones that are operated in a load-carrying or variable load manner, are inherently variable, especially on a short-term basis. In addition, commenters corrected Region 10's assumptions regarding the relationship between oxygen (O2) and CO in hog fuel boilers. Specifically, Comment D stated:

> When tuning a hogged fuel fired boiler, many different fuels and firing strategies are assessed. Different ratios of chips, sawdust, shavings, and bark as well as the firing rate response are variables that limit the minimum excess air contribution. Tuning a wood fired boiler near stoichiometric (low O2) can cause extremely high CO excursions and unsafe explosive conditions. . . .
>
> In all three cases as well as all other wood boilers I have observed, decreasing O2 decreases CO and increasing O2 increases CO. This is because wood boilers are tuned oxygen rich.
>
> The O2 data acquired from the last source tests on the Riley and CE boilers was compared to the EPA Area Sources Boiler Tune-up Guide for Owners and Operators (Energy Management Services) and the Manufactures Data Sheet. The combustors were operating within the EPA guidelines. See Supplemental Data #5
>
> EPA wrongly concludes that the data for these boilers, and the observed relationship between O2 and CO, reflect improper operation and maintenance triggering new requirements for the facility. The Riley and CE boilers are properly operated and maintained consistent with industry practice and good boiler systems management. EPA misunderstands the data and misunderstands that the observed conditions and the relationship observed between O2 and CO are normal for biomass (hog fuel) boiler combustion.

Response: EPA agrees with these commenters and has removed proposed monitoring Condition 5.14.8 and associated reporting requirement Condition 5.23.

3.3. Boiler MACT Requirements regarding collecting operating load data or steam generation data

Commenter: Q2

Permit Conditions: 5.18 (new 5.15), 5.19 (new 5.16), 5.20 (new 5.17), 5.21 (new 5.18), 5.22 (new 5.19)

Comment: PotlatchDeltic contests Region 10's interpretation of the Boiler MACT as requiring the facility to use a flow monitoring system CPMS to measure a boiler's steam generating rate. PotlatchDeltic states:

Boiler MACT does not require a flow sensor or any other type of CPMS relating to steam generation data and does not establish any performance criteria. Contrary to the baseless assertion in EPA Region 10's SOB, the steam generation monitor required to be used under 40 CFR § 63.7540(a) and Table 7 to subpart DDDDD is not a CPMS. This is readily apparent from economic impact analysis performed by EPA and relied upon by Administrator Jackson to satisfy her obligations under Executive Order 12866 with respect to Boiler MACT, which considered only the parameter monitoring requirements expressly required in the codified rule: COMS; PM CPMS; fabric filter bag leak detectors; pH, pressure drop, and liquid flow rate monitoring systems for wet scrubbers; injection rate monitoring systems for activated carbon injection and dry scrubber systems; oxygen analyzers. November 2011 Control Costs Memorandum (see Index of Attachments); August 2012 Cost Estimation Memorandum (see Index of Attachments).

Response: For the following reasons, EPA agrees with PotlatchDeltic and has removed draft Conditions 5.18.1 through 5.18.4. Region 10 has deleted references to boiler steam monitoring in CPMS-related Boiler MACT Conditions 5.19 (new 5.16), 5.20 (new 5.17), 5.21 (new 5.18), and 5.22 (new 5.19). The Boiler MACT at 40 CFR 63.7525(e) states: "If you have an operating limit that requires the use of a flow monitoring system, you must meet the requirements in paragraphs (d) and (e)(1) through (4) of this section." The regulation at 40 CFR 63.7525(d) contains CMS requirements. The term "flow monitoring system" is not defined in the Boiler MACT. EPA reviewed how this term is used in the Boiler MACT to determine if it applies to steam generation monitors. In Table 8 of the Boiler MACT, the term "flow rate monitoring system" is only used with respect to row 4: Wet Scrubber Pressure Drop and Liquid Flow-Rate: "a. Collecting the pressure drop and liquid flow rate monitoring system data according to §§ 63.7525 and 63.7535; . . . ." With respect to boiler and process heater operating load, Table 8, row 10 states: "You must demonstrate compliance by: Collecting operating load data or steam generation data every 15 minutes." In addition, Table 8, row 10 does not cross reference 40 CFR 63.7525, whereas, Table 8, row 4 (as well as other rows) does. Based on this, the operating limit in Table 8, row 10 regarding boiler and process heater operating load does not require the use of a flow monitoring system as that term is used in 40 CFR 63.7525(e).

3.4. Reestablishing Operating Limit

Commenter: J

Permit Conditions: 5.26.5 (new 5.22.5)

Comment: Commenter contends that the proposed permit condition contradicts the language in Boiler MACT, 40 CFR 63.7450(a)(1) (Region 10 thinks the commentor intended to write 40 CFR 63.7540(a)(1)) and in permit condition 5.26.4. Boiler MACT states that operating limits must be confirmed or re-established during performance tests. The regulatory agency must first review the source test, then decide if the test confirms the operating limit, it is not automatically changed. The commenter recommends that proposed permit condition 5.26.5 be removed.

Response: EPA disagrees with commenter's recommendation that the permit condition be removed. When performance testing establishes a new threshold for the operating limit (e.g., higher opacity limit, lower oxygen limit, higher steaming rate limit), it is appropriate to require

the Permittee to submit a request to administratively amend the permit to update values in Tables 5-5, 5-6 and 5-7. If the values are not amended, Condition 5.7 will fail to reflect applicable requirements (Boiler MACT operating limits) pursuant to 40 CFR 71.6(a)(1).

3.5. Boiler MACT Notice of Compliance Status

Commenter: J**;** Q2

Permit Conditions: 5.27

Comment: Commenter states that requiring Boiler MACT Notice of Compliance Status after each performance test duplicates performance test reporting requirements in Condition 5.26.

Response: EPA agrees with the commenter and has removed proposed Condition 5.27.

3.6. Performance Test Setting PB-1 Oxygen Operating Limit

Commenter: Q2

Permit Conditions: 5.7.2.1 (new 5.7.2.1.1)

Comment: Commenter requests change to date of PB-1 performance test that set minimum O2 operating limit.

Response: EPA agrees with the commenter and has finalized the permit to reference a 2024 (not 2016) performance test as having set the minimum O2 operating limit for PB-1.

4. Paraphrasing Applicable Requirements

Commenter: Q2

Permit Conditions: 3.17, 3.19.4, 3.32, 3.42.1, 3.44 (not finalized), 5.1.1, 5.2.1, 5.6.1, 5.9.5, 5.10.3 (new 5.10.2), 5.10.4 (new 5.10.3), 5.17 (new 5.14), 5.22.6 (new 5.19.6), 5.22.7 (new 5.19.7), 5.25 (new 5.22), 5.25.1 (new 5.22.1), 5.25.2 (new 5.22.2), 5.29.8 (new 5.26.8), 5.29.9 (new 5.26.9), 5.29.13 (new 5.26.13), 5.29.16 (new 5.26.16), 5.29.17 (new 5.26.17), 5.32 (new 5.29), 6.4, 6.4.1, 6.4.2, 6.16.2, 6.17, 6.25.4, 6.25.5, 6.25.8, 6.25.9, 7.4, 8.3, 8.4.3, 8.8 (new 8.8 and 8.9), 8.10 (new 8.11), 8.13 (new 8.14), 9.5.2, 9.5.3, 9.11 (new 9.10), 10.5

Comment: PotlatchDeltic states that the SOB does not explain any of the inconsistencies between the permit conditions and their underlying federal regulation as required by 40 CFR 71.6(a)(1)(i). PotlatchDeltic requests that the above permit conditions be revised with the correct CFR content without any modifications.

Response: EPA has reviewed the permit conditions identified by the commentor for inconsistencies with the underlying regulation. Where EPA agreed it makes sense to do so, EPA has edited the permit condition to align more closely with the underlying regulation. One permit condition was not finalized as EPA determined it to be duplicative. In a few instances, EPA edited (for inconsistencies) similar permit conditions to the ones identified by the commentor (e.g., Conditions 8.5.2 and 8.5.3 are similar to Condition 9.5.2 and 9.5.3.). In all instances where

there remains any inconsistency between a permit condition and the underlying regulation, EPA edited the SOB to identify the inconsistency. In such instances, the permit condition contains paraphrasing for clarity purposes or ease of reference. Permit Condition 2.1 states that the language of the cited regulation takes precedence over paraphrasing except in limited circumstances, and none of those limited circumstances applies to the conditions identified by this comment.

5. Federal Air Rules for Reservations (FARR)

5.1. FARR Reference Methods

Commenter: Q2

Permit Conditions: 5.1; 5.2; 6.1; 6.2; 8.1; 8.2; 9.1; 9.2

Comments: PotlatchDeltic states that the cited proposed permit conditions for FARR PM and SO2 emission limits refer to PM and SO2 testing, but that the SOB repeatedly indicates that no testing is required. PotlatchDeltic states that it interprets the language in the proposed permit to be informational without establishing testing requirements.

Response: To clarify that no unit-specific testing or monitoring is included in the cited permit conditions, EPA has edited the cited permit conditions to reflect precisely the language in the underlying FARR regulation.

5.2. FARR Visible Emission Limit Gap-Filling Monitoring

5.2.1. Veneer Dryers VD-1, VD-2, VD-3, and VD-4

Commenter: Q2

Permit Conditions: 6.3

Comments: PotlatchDeltic states:

> EPA Region 10's proposed visible emission survey for veneer dryer malfunctions is flawed and impractical due to the operational realities during a malfunction event, and is therefore arbitrary and capricious. The veneer dryer-heated sections are vented to the RCO at all times, except when there is a safety-related shutdown (e.g., a fire inside a veneer dryer) that requires the facility to shut down the veneer dryers and vent the heated sections of the veneer dryers to the atmosphere.
>
> These safety-related shutdowns occur very infrequently and last for 15 to 20 minutes (the time required to empty the veneer dryers), which is much too short of time to conduct a Reference Method 9 reading by a certified observer across

> potentially 11 bypass stacks and simultaneously attend to the underlying safety event.
>
> PotlatchDeltic agrees that FARR visible emission standards apply during malfunction events. The existing PCWP MACT requirements provide sufficient compliance assurance for reducing visible emissions during a malfunction event. The heated sections of the veneer dryers are regulated under PCWP MACT and include safety-related shutdown provisions that require PotlatchDeltic to follow documented procedures to safely and quickly minimize emissions from the veneer dryers during malfunction events (see Conditions 6.4 and 6.5 of the Draft Title V). Compliance with the PCWP MACT is sufficient compliance assurance for the FARR requirement.

Response: The FARR visible emission limit contains no required monitoring. 40 CFR 49.124. The PCWP MACT does not require visible emissions monitoring when the veneer dryer heating section emissions are diverted to atmosphere. Thus, gap-filling monitoring is required pursuant to 40 CFR 71.6(a)(3)(i)(B). In consideration of this comment, EPA has edited Condition 6.3.1 to include an exception from the requirement. The requirement to visually survey each bypass stack exhaust for the presence of visual emissions does not apply if the Permittee follows documented site-specific procedures (required by PCWP MACT) and veneer dryer operation ceases within one hour of the start of the safety-related shutdown.

5.2.2. Compression Ignition Internal Combustion Engines IC-1 and IC-2

Commenter: Q2

Permit Conditions: 8.7

Comments: PotlatchDeltic states that monitoring to assure compliance with FARR visible emission limit causes unnecessary emissions, and that complying with NSPS IIII and NESHAP ZZZZ requirements assures compliance with FARR 20% opacity visible emissions limit. PotlatchDeltic states:

> Additional compliance burden is unwarranted in the circumstance when another overlapping regulation applies to the same emissions units. This type of Title V streamlining is encouraged, as described by OAQPS in White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program.

Response: While NSPS IIII and NESHAP ZZZZ apply to the engines and limit PM emissions, those regulations do not limit visible emissions to 20% opacity nor require visible emissions monitoring. PotlatchDeltic does not show how complying with the NSPS IIII and NESHAP ZZZZ emission standards demonstrates compliance with a six-minute average 20% opacity visible emissions limit. Absent such a demonstration, EPA is not compelled to streamline the FARR 20% opacity visible emissions limit. The FARR visible emission limit contains no required monitoring. 40 CFR 49.124. Thus, gap-filling monitoring is required pursuant to 40 CFR 71.6(a)(3)(i)(B).

In consideration of minimizing the compliance burden upon PotlatchDeltic, EPA has edited Condition 8.7. To eliminate the possibility of this monitoring requirement compelling PotlatchDeltic to operate the engine (when it otherwise would not), Region 10 revised the permit condition to clarify that monitoring at least once per calendar year is only required if the engine operated in that year. The permit condition has been edited further as follows: (a) EPA Reference Method 9 must be conducted only if EPA Reference Method 22 observation first identifies visible emissions, and (b) the duration of EPA Reference Method 9 observations must be at least six minutes (not 30 minutes as proposed) or the duration of operation, whichever is shorter.

5.2.3. Spark Ignition Internal Combustion Engines IC-3 through IC-11

Commenter: Q2

Permit Conditions: 9.6

Comments: PotlatchDeltic states that conducting annual visual emissions surveys on propane-fired emergency engines to assure compliance with FARR 20% opacity visual emissions limit is unwarranted as propane is a clean fuel. PotlatchDeltic states that complying with NSPS JJJJ and NESHAP ZZZZ requirements assures compliance with FARR 20% opacity visual emissions limit.

Response: EPA agrees. The final permit does not include a requirement to survey IC-3 through IC-11 for visible emissions to assure compliance with FARR 20% opacity limit.

6. Other

6.1. NESHAP Subpart DDDD (PCWP MACT)

Commenter: Q2

Permit Conditions: 6.8

Comments: The commenter states that language on page 79 of the SOB explaining PCWP MACT's limit for regenerative catalytic oxidizer minimum temperature (Condition 6.8) is confusing. The commenter requests EPA to replace the SOB language it perceives to be confusing as follows:

> ~~Although t~~The Permittee is required to conduct performance testing every 60 months pursuant to Condition 6.11~~,~~. ~~the minimum catalytic oxidizer temperature limit in Condition 6.8 is not automatically updated to reflect the temperature observed during the most recent test.~~ Pursuant to Condition 6.8.2, the Permittee may choose to establish a different minimum catalytic oxidizer combustion chamber temperature from the one established in September 2008 by submitting notification pursuant to Condition 6.22.2. The RCO minimum temperature of 707°F from the 2008 source test continues to apply today, and the 2023 source test confirmed the previous RCO minimum temperature. In

the future, PotlatchDeltic may establish a lower RCO minimum temperature by submitting notification to EPA according to 40 CFR 63.2262(l)(2).

Response: EPA agrees to finalize the SOB with the language recommended by the commenter.

6.2. Incorporation of 40 CFR 71.6(a)(13) Requirements

Commenter: Q2

Permit Conditions: 2.13, 3.39

Comments: The authority for Conditions 2.13.3 and 2.13.4 is the definition of "Section 502(b)(10) changes" in 40 CFR 71.2 and not 40 CFR 71.6(c)(1). The commenter states that the requirement to attach CAA section 502(b)(10) change report to the permit in Condition 2.13.5 and 3.39 is not authorized and appears twice in the permit.

Response: EPA agrees with the commenter regarding the authority for Conditions 2.13.3 and 2.13.4, and EPA has finalized the permit with the correct reference to the authority for the conditions. EPA has also finalized Conditions 2.13.5 and 3.39, as requested, without a requirement to attach CAA section 502(b)(10) change report to the permit. EPA, however, does not agree that Conditions 2.13.5 and 3.39 are duplicative. Because Condition 3.39 includes an explicit requirement to submit a section 502(b)(10) change report to EPA while Condition 2.23 does not, EPA is finalizing the permit with both conditions.

6.3. Delete Boiler/Control Device Monitoring Requirements

Commenter: Q2; U

Permit Conditions: 5.14 (new 5.12)

Comments: Commenters request Condition 5.14 be deleted.

Response: As discussed above in Section 3.2, EPA has removed all elements of Condition 5.14 (new 5.12) that were proposed under the authority of 40 CFR 71.6(c)(1). What remains of the permit condition are applicable requirements from the underlying minor NSR permit. EPA does not have the authority to exclude applicable requirements from the title V permit.