Applicability of FARR, NSPS and NESHAP Requirements to St. Maries Complex

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1. Table 1: Applicability of 40 CFR part 49, subpart C to EU-1 through EU-11

Citation 40 CFR	Description	Applicability
49.121 – 49.122	Introduction and delegation	Applies; see Permit Condition 4.23 for incorporation by reference.
49.123(a-e)	Definitions, testing, monitoring,	Applies; see Permit Condition 4.23 for
	recordkeeping, reporting, and	incorporation by reference. For credible
	credible evidence and incorporation	evidence (d), see Permit Condition 2.6.
	by reference	
49.124(a-b, f)	Visible emission limits purpose,	Applies; see Permit Condition 4.23 for
	applicability and definitions	incorporation by reference.
49.124(c)	Exemptions	Applies; see Permit Condition 3.10.
49.124(d)(1-2)	Visible emission limit	Applies; see Permit Conditions 3.9 and 3.11.1.
49.124(d)(3)	Visible emission limit for oil and solid fuel	Applies; see Permit Condition 3.11.2.
49.124(e)	Reference method	Applies; see Permit Condition 3.9.
49.125(a-c, f)	PM limits purpose, applicability and	Applies, see Permit Condition 4.23 for
	definitions	incorporation by reference.
49.125(d)(1)	PM limit for combustion source	Applies; see Permit Conditions 8.1 and
	stack except for wood-fired boiler	9.1.
49.125(d)(2)	PM limit for wood-fired boiler stack	Applies; see Permit Conditions 5.1.
49.125(d)(3)	PM limit for process source stack	Applies; see Permit Conditions 6.1, 10.1, 11.1 and 12.1.
49.125(e)	PM Reference method	Applies; see Permit Conditions 5.1, 6.1,
		8.1, 9.1, 10.1, 11.1 and 12.1.
49.126(a-b, f)	Fugitive PM limits purpose,	Applies; see Permit Condition 4.23 for
	applicability and definitions	incorporation by reference.
49.126(c)	Exemptions	Applies; see Permit Condition 3.17.
49.126(d-e)	Fugitive PM	Applies; see Permit Conditions 3.12-3.16
		and 3.35.
49.129(a-c, f)	SO ₂ limits purpose, applicability and	Applies; see Permit Condition 4.23 for
	definitions	incorporation by reference.
49.129(d)(1)	SO ₂ limit for combustion sources	Applies; see Permit Condition 5.2, 6.2,
		8.2 and 9.2.
49.129(d)(2)	SO ₂ limit for process sources	Does not apply because none of
		PotlatchDeltic's (PD's) processes emit
		SO ₂ .
49.129(e)	SO ₂ Reference method	Applies; see Permit Conditions 5.2, 6.2, 8.2 and 9.2.
49.130(a-c, g)	Fuel sulfur limit purpose,	Applies; see Permit Condition 4.23 for
	applicability and definitions	incorporation by reference.
49.130(d)(1-2)	Fuel sulfur limits for No. 1 and 2	Applies; see Permit Condition 4.3.
	diesel fuel	
49.130(d)(3-6)	Fuel sulfur limits for various liquid	Does not apply because PD does not burn
	and solid fuels	any of the fuels listed.
49.130(d)(7)	Fuel sulfur limit for solid fuels	Applies; see Permit Condition 4.2.
49.130(d)(8)	Fuel sulfur limit for gaseous fuels	Applies; see Permit Condition 4.4.
	-	Applies; see Permit Condition 4.3.1.
49.130(e)(1)	Reference methods for liquid fuels	Applies, see Perrint Condition 4.5.1.

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Citation 40 CFR	Description	Applicability
		burn any coal.
49.130(e)(3)	Reference methods for solid fuels	Applies; see Permit Condition 4.2.1.
49.130(e)(4)	Reference method for gaseous fuels	Applies; see Permit Condition 4.4.1.
49.130(f)(1)(i)	Recordkeeping for liquid fuels	Applies; see Permit Condition 4.6.
49.130(f)(1)(ii)	Recordkeeping for gaseous fuels	Applies; see Permit Condition 4.7.
49.130(f)(1)(iii)	Recordkeeping for solid fuels	Applies; see Permit Condition 4.5.
49.130(f)(2)	Recordkeeping for liquid, gaseous and solid fuels	Applies; see Permit Condition 3.35.
49.130(f)(3)	Recordkeeping exemption for residences	Does not apply because SMC is not a residence.
49.131(a, b, f)	Open burning purpose, applicability and definitions	Applies; see Permit Condition 4.23 for incorporation by reference.
49.131(c, d, e)	Open burning	Applies; see Permit Conditions 3.4 through 3.8.
49.135	Detrimental emissions	Applicable if triggered but not included in the permit because no determination has been made or permit issued.
49.137(a, b, d)	Air pollution episode purpose, applicability and definitions	Applies; see Permit Condition 4.23 for incorporation by reference.
49.137(c)(1-3)	Air pollution episodes	Applies; see Permit Condition 4.23 for incorporation by reference.
49.137(c)(4)(i-ii)	Air pollution episodes	Applies; see Permit Conditions 3.6 and 3.7.
49.137(c)(4)(iii)	Air pollution episodes	Applies; see Permit Condition 4.23 for incorporation by reference.
49.138(a-c, g)	FARR registration purpose, applicability and definitions	Applies; see Permit Condition 4.23 for incorporation by reference.
49.138(d) and (f)	FARR registration and reporting for part 71 sources	Applies; see Permit Condition 4.23 for incorporation by reference See Permit Condition 3.45.2 for FARR registration reporting via CDX FORS and Permit Condition 3.40 for all other reporting via CDX CEDRI.
49.138(e)(1-2, 5- 8)	Reporting for non-part 71 sources	Does not apply because SMC is a part 71 source.
49.138(e)(3)(i-xi), (xiii-xiv)	Reporting for non-part 71 sources	Does not apply because SMC is a part 71 source.
49.138(e)(3)(xii)	Annual registration information	Applies; see Permit Condition 3.45.
49.138(e)(4)	Procedures for estimating emissions for annual registration	Applies; see Permit Conditions 3.45 and 3.45.1.
49.139	Non-Title V operating permits	Applicable if triggered.

2. Table 2: Applicability of 40 CFR part 60, subpart JJJJ to EU-5's IC-3 through IC-11

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Citation 40 CFR	Description	Applicability
60.4230(a)	General applicability	Applies; see Permit Condition 9.8 for incorporation by reference. See 40 CFR 60.4230(a)(4)(iii) for specific provision applicable to installed engines.
60.4230(b)	Applicability for engines being tested at test cell/stand	Does not apply because the installed engines are not tested at an engine test cell/stand.
60.4230(c)	Part 71 permit exemption for area sources	Does not apply because SMC is a Title V major source.
60.4230(d)	Engines using alcohol-based fuels	Does not apply because the installed engines do not burn alcohol-based fuels.
60.4230(e)	Eligibility for exemption from NSPS JJJJ requirements pursuant to 40 CFR part 1054, 1048 and 1068	Applicability not determined, and provision not included in permit. PD has not requested an exemption.
60.4230(f)	Temporary replacement engines	Does not apply because the installed engines are not acting as temporary replacement engines.
60.4231(a)(4) & 60.4233(a)	Emission standards for SI engines with a maximum engine power less than or equal to 25 HP manufactured on or after July 1, 2008 to the certification emission standards and other requirements for new nonroad SI engines in 40 CFR part 1054	Applies; see Permit Condition 9.3.1 for IC-3, IC-7, IC-8, IC-10 and IC-11. Inapplicable requirements are excluded based upon installed engines' maximum engine power rating, engine displacement, manufacturing date, fuel type, etc.
60.4231(c) & 60.4233(c)	Emission standards for emergency SI rich burn engines that use LPG with a maximum engine power between 25 and 130 HP manufactured on or after July 1, 2008	Applies; see Permit Condition 9.3.2 for IC-6 and IC-9. Inapplicable requirements are excluded based upon installed engine's emergency designation.
60.4233(d)	Emission standards for emergency SI lean burn engines that use LPG with a maximum engine power between 25 and 130 HP	Applies; see Permit Condition 9.3.3 for IC-4 and IC-5. Inapplicable requirements are excluded based upon installed engine's emergency designation.
60.4234	Emission standard compliance duration	Applies; see Permit Condition 9.4.
60.4235	Fuel requirements for gasoline fired engines	Does not apply because the installed engines combust propane, not gasoline.
60.4236	Installation and import restrictions	Does not apply because the requirements are obsolete.
60.4237(a-b)	Monitoring requirements for emergency engines greater than 500 HP or between 130 & 500 HP	Does not apply because each installed engine's maximum engine power rating is less than 130 HP.
60.4237(c)	Monitoring requirements for emergency engines less than 130 HP	Applies; see Permit Condition 9.6 for IC-4, IC-5, IC-6 and IC-9. Does not apply to IC-3, IC-7, IC-8, IC-10 and IC-11 as long as installed engines are operated and maintained according to manufacturer's instructions.

Citation	Appendix B	
Citation 40 CFR	Description	Applicability
60.4238 to 60.4242	Compliance requirements for manufacturers	Does not apply because PD is the owner and operator of the installed engines, not the manufacturer.
60.4243(a)	Compliance requirements for owners and operators	Applies; see Permit Condition 9.4.
60.4243(b)	Compliance demonstration for certain engines with maximum engine power greater than 25 HP	Applies; see Permit Condition 9.4 for IC-4 and IC-5.
60.4243(c)	Compliance demonstration for modified or reconstructed engines	Does not apply because the installed engines are reported by PD to have been neither modified nor reconstructed.
60.4243(d)	Emergency engine designation	Applies; see Permit Condition 9.5. DC Circuit Court of Appeals vacated 40 CFR 60.4243(d)(2)(ii) & (iii) in mandate issued May 4, 2016.
60.4243(e)	Operating requirements for engines certified to natural gas.	Does not apply because the installed engines are certified to propane, not natural gas.
60.4243(f)	Performance testing requirement	Does not apply because performance testing is not required of installed engines, even if de-certified pursuant to 40 CFR 60.4243(a)(2)(i).
60.4243(g)	Air-to-fuel ratio controllers	Does not apply because PD is not required to operate three-way catalysts/non-selective catalytic reduction on installed engines.
60.4243(h)	Compliance demonstration for engines with maximum engine power greater than or equal to 500 HP.	Does not apply because the installed engines' maximum engine power less than 500 HP.
60.4243(i)	Compliance demonstration for modified or reconstructed engines	Does not apply because the installed engines are reported by PD to have been neither modified nor reconstructed.
60.4244	Test methods and procedures	Does not apply because testing of the installed engines is not required.
60.4245(a)(1)	Notification records	Does not apply because PD is not required to submit any notifications.
60.4245(a)(2) & (3)	Maintenance and manufacturer's certification records	Applies; see Permit Condition 9.7.
60.4245(a)(4)	Compliance documentation	Does not apply as long as installed engines are operated and maintained according to manufacturer's instructions.
60.4245(b)	Recordkeeping	Applies to IC-4, IC-5, IC-6 and IC-9; see Permit Condition 9.7. Does not apply to IC- 3, IC-7, IC-8, IC-10 and IC-11 because the installed engines' maximum engine power is less than 25 HP.

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40 CFR	Description	Applicability
60.4245(c)	Initial notification for engine greater than	Does not apply because the installed
	or equal to 500 HP	engines' maximum engine power is less than 500 HP.
60.4245(d)	Submitting performance test report	Does not apply because testing of the installed engines is not required.
60.4245(e)	Annual reporting of emergency engine operation for engines with maximum engine power is greater than 100 HP	Does not apply because the installed engines' maximum engine power is less than 100 HP.
60.4246	NSPS general provisions	Applies; see Permit Condition 9.9.
60.4247	Mobile source provisions for manufacturers	Does not apply because PD is the owner and operator of the installed engines, not the manufacturer.
60.4248	Definitions	Applies; see Permit Condition 9.8 for incorporation by reference.
Table 1 to NSPS JJJJ	Emission standards for stationary emergency engines greater than 25 HP	Applies; see Permit Condition 9.3.3 for IC-4 and IC-5.
Table 2 to	Requirements for Performance Tests	Does not apply because PD is not required
NSPS JJJJ		to conduct testing of the installed engines.
Table 3 to	NSPS general provisions	Applies; see Permit Condition 9.9.
NSPS JJJJ		
Table 4 to	Mobile source provisions for manufacturers	Does not apply because PD is the owner
NSPS JJJJ		and operator of the installed engines, not
		the manufacturer.

3. Table 3: Applicability of 40 CFR part 60, subpart A to EU-5's IC-3 through IC-11

Citation 40 CFR	Description	Applicability
60.1 to 60.3	Applicability, definitions and units	Applies; see Permit Condition 9.9 for
		incorporation by reference
60.4(a)	Reporting address	Applies; see Permit Condition 9.9 for
		incorporation by reference. See also 3.40
		for the current address for reporting to
		Region 10, including NSPS submittals.
60.4(b)	Delegation	Applies; see Permit Condition 9.9 for
		incorporation by reference.
60.5 & 60.6	Construction and review of plans	Applies; see Permit Condition 9.9 for
		incorporation by reference.
60.7	Notification and recordkeeping	Does not apply. Pursuant to subpart JJJJ's
		Table 3, 40 CFR 60.7 applies to the extent
		specified in 40 CFR 60.4245. The 40 CFR
		60.7 requirements specified in 40 CFR
		60.4245 do not apply to PD.
60.8	Performance tests	Does not apply because PD is not required
		to conduct testing of installed engines.
60.9 & 60.10	Availability of information and state	Applies; see Permit Condition 9.9 for
	authority	incorporation by reference.

60.11	Compliance with standards	Does not apply. Although subpart JJJJ's Table 3 states that 40 CFR 60.11 requirements apply, the table also states that the requirements are specified in subpart JJJJ. Thus, PD is not required to comply with the requirements presented in 40 CFR 60.11.
60.12	Circumvention	Applies; see Permit Conditions 9.9 and 9.10 for incorporation by reference.
60.13	Monitoring	Does not apply because subpart JJJJ's Table 3 states that this provision is not applicable.
60.14 – 60.17	Modification, reconstruction, priority list and incorporations by reference	Applies; see Permit Condition 9.9 for incorporation by reference.
60.18	Control devices	Does not apply because subpart JJJJ's Table 3 states that this provision is not applicable.
60.19	General notification and reporting	Applies; see Permit Condition 9.9 for incorporation by reference.

4. Table 4: Applicability of 40 CFR part 63, subpart DDDD to EU-2's VD-1 through VD-4 and RCO and EU-3's ES, WP and SCL

Citation 40 CFR	Description	Applicability
63.2230, 63.2231, 63.2232	Purpose, applicability, affected source	Applies; see Permit Conditions 6.27 and 7.5 for incorporation by reference.
63.2233(a)	Compliance dates for compliance options, operating requirements and work practice requirements for new or reconstructed affected sources	Does not apply because the affected source is neither new nor reconstructed.
63.2233(b)	Compliance dates for compliance options, operating requirements and work practice requirements for existing affected sources	Applies; see Permit Conditions 6.4 through 6.9.
63.2233(c)	Compliance requirements for an area source becoming a major source	Does not apply because the facility is a major source.
63.2233(d)	Schedule for complying with notification requirements	Applies; see Permit Conditions 6.21 and 6.22.
63.2240	Compliance options and operating requirements	Applies; see Permit Conditions 6.10 through 6.12 for veneer dryer heated zone emissions.
63.2240(a)	Production-based compliance options and operating requirements	Does not apply because PD has chosen the add-on control system compliance option for veneer dryer heated zone emissions.

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Citation 40 CFR	Description	Applicability
63.2240(b)	Add-on control system compliance option and operating requirements	Applies; see Permit Conditions 6.7 through 6.9 for veneer dryer heated zone emissions.
63.2240(c)	Emissions averaging compliance option and operating requirements for existing sources only	Does not apply because PD has chosen add-on control system compliance option for veneer dryer heated zone emissions.
63.2241(a)	Work practice requirements	Applies; see Permit Conditions 6.5 and 6.6 for veneer dryer safety-related shutdown and fugitive emissions. See Permit Condition 7.1 for surface coating.
63.2241(b)	Alternative to the work practice requirements	Does not apply because PD has not requested an alternative work practice requirement.
63.2241(c)	Provision applicable to dry rotary dryers	Does not apply because PD does not operate a dry rotary dryer.
63.2250(a)	Compliance with compliance options, operating requirements and work practice requirements at all times except startup, shutdown and malfunction prior to August 13, 2021	Does not apply because the requirements are obsolete. The "expiration" date of the requirement has passed.
63.2250(b)	Good air pollution control practices prior to August 13, 2021	Does not apply because the requirements are obsolete. The "expiration" date of the requirement has passed.
63.2250(c)	Startup, shutdown and malfunction plans prior to August 13, 2021	Does not apply because the requirements are obsolete. The "expiration" date of the requirement has passed.
63.2250(d)	Provision applicable to direct-fired softwood veneer dryers	Does not apply because PD does not operate a direct-fired softwood veneer dryer.
63.2250(e)	Compliance with NESHAP General Provisions	Applies; see Permit Conditions 6.17, 6.28 and 7.6.
63.2250(f)	Compliance with NESHAP DDDD required except as specified	Applies; see Permit Condition 6.4.
63.2250(f)(1)	Exception from compliance with NESHAP DDDD prior to initial startup	Does not apply because the affected source is operating.
63.2250(f)(2)	Exception from compliance with NESHAP DDDD during safety-related shutdowns	Applies; see Permit Condition 6.4.
63.2250(f)(3) and (4)	Exception from compliance with NESHAP DDDD during startup and shutdown for certain units	Does not apply because PD does not operate a pressurized refiner or a direct-fired softwood veneer dryer.
63.2250(f)(5)	Compliance with compliance options and operating requirements not achieved during safety-related shutdown	Applies; see Permit Condition 6.4.1.
63.2250(f)(6)	NESHAP DDDD standard during safety-related shutdown	Applies; see Permit Conditions 6.4.2 and 6.5.

Citation	Appendix B	
40 CFR	Description	Applicability
63.2250(g)	Good air pollution control practices on and after August 13, 2021	Applies; see Permit Condition 6.10.
63.2251	Routine control device maintenance exemption	Does not apply because PD did not request a routine control device maintenance exemption.
63.2252	Requirements for process units not subject to compliance options or work practice requirements	Does not apply because EU-2 and EU-3 are subject to compliance options and/or work practice requirements.
63.2260(a)	Performance testing and establishing site-specific operating requirements to demonstrate initial compliance	Does not apply because the requirements are obsolete
63.2260(b)	Demonstrating initial compliance	Applies; see Permit Conditions 6.5 and 6.18.1.
63.2260(c)	Notification of compliance status for initial compliance demonstration	Does not apply because the requirements are obsolete
63.2261	Initial compliance demonstrations	Does not apply because the requirements are obsolete
63.2262(a) to (e), (g), (h) and (l)	Conducting performance tests and establishing operating requirements, handling nondetect data, calculation of percent reduction across a control system	Applies; see Permit Conditions 6.8.2 and 6.12.
63.2262(f), (i) and (j)	Collection of production data, calculation of mass per unit production and thickness basis conversion	Does not apply because PD is not choosing production-based compliance option for veneer dryer heated zone emissions.
63.2262(k)	Establishing thermal oxidizer operating requirements	Does not apply because PD operates a catalytic oxidizer, not a thermal oxidizer.
63.2262(m)	Establishing biofilter operating requirements	Does not apply because PD operates a catalytic oxidizer, not a biofilter.
63.2262(n)	Establishing operating requirements for process units meeting compliance options without a control device	Does not apply because PD has chosen add-on control system compliance option to address veneer dryer heated zone emissions.
63.2262(o)	Establishing operating requirements using THC CEMS	Does not apply because PD is employing temperature monitoring system to demonstrate compliance with oxidation catalyst operating requirements.
63.2263	Initial compliance demonstration for a dry rotary dryer.	Does not apply because PD is not operating a dry rotary dryer.
63.2264	Initial compliance demonstration for a hardwood veneer dryer.	Does not apply because PD is not operating a hardwood veneer dryer.
63.2265	Initial compliance demonstration for a softwood veneer dryer.	Does not apply because the requirements are obsolete.
63.2266	Initial compliance demonstration for a veneer redryer.	Does not apply. Although PD redrys veneer, it is complying with add-on control system compliance option at all

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Citation 40 CFR	Description	Applicability
		times, regardless of drying green or redry veneer.
63.2267	Initial compliance demonstration for a reconstituted wood product press or board cooler	Does not apply because PD does not operate reconstituted wood product press or board cooler.
63.2268	Initial compliance demonstration for a wet control device	Does not apply because PD does not employ a wet control device.
63.2269(a)	General CPMS requirements	Applies; see Permit Conditions 6.15 through 6.15.3.
63.2269(b)	Temperature monitoring	Applies; see Permit Conditions 6.15.4 through 6.15.9.
63.2269(c)	Wood moisture monitoring	Does not apply because PD is not required to conduct wood moisture monitoring.
63.2269(d)	CEMS requirements	Does not apply because PD is not required to operate a CEMS.
63.2270(a) to (d) and (f)	Calculations with CMS data	Applies; see Permit Condition 6.16.
63.2271(a)	Demonstrating continuous compliance	Applies; see Permit Conditions 6.5.1 and 6.18.2 for safety-related shutdown emissions, 6.6.1 and 6.13 for veneer dryer fugitives, 6.7.1.1 and 6.8.1 for catalytic oxidizer temperature, 6.7.1.2, 6.9 and 6.9.1 for catalyst activity level and 6.7.1.3 and 6.11 for repeat performance testing. For surface coating, see Permit Condition 7.3.1.
63.2271(b)	Reporting deviations	Applies; see Permit Condition 6.24.1. For surface coating, see Permit Condition 7.4.
63.2271(b)(3)	Deviations during routine control device maintenance	Does not apply because PD did not request a routine control device maintenance exemption.
63.2271(b)(4)	Reporting of safety-related shutdown	Applies, see Permit Condition 6.24.1.1.
63.2280(a)	NESHAP general provisions notifications	Applies; see Permit Condition 6.21.1.
63.2280(b)	Initial notification	Does not apply because the requirements are obsolete.
63.2280(c)	Notification of performance test	Applies; see Permit Condition 6.21.2.
63.2280(d) and (d)(2)	NOCS for repeat performance testing	Applies; see Permit Condition 6.21.3.
63.2280(d)(1)	NOCS for initial compliance demonstration that does not include performance testing	Applies; see Permit Condition 6.21.4.
63.2280(e)	Routine control device maintenance exemption request	Does not apply because PD did not request a routine control device maintenance exemption.

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Citation 40 CFR	Description	Applicability	
63.2280(f)	Emissions Averaging Plan Submittal	Does not apply because PD has not chosen emissions average plan compliance option.	
63.2280(g), (g)(1) and (3)	Notification before taking action	Applies; see Permit Condition 6.22.	
63.2280(g)(2)	Notification before taking action – Emissions Averaging Plan	Does not apply because PD has not chosen emissions average plan compliance option.	
63.2281(a)	Table 9 reports	Applies; see Permit Conditions 6.24, 6.26 and 7.4.	
63.2281(b)	Table 9 reports schedule	Applies; see Permit Conditions 6.23, 6.24 and 7.4.	
63.2281(c), (d) and (e)	Semiannual Compliance Report Content	Applies; see Permit Condition 6.25 and 7.4. Text of requirements included in Permit Condition 6.25, and requirements referenced in Permit Condition 7.4.	
63.2281(f)	Reporting for emissions averaging	Does not apply because PD has not chosen to comply with the emissions averaging compliance option.	
63.2281(g)	Semiannual Compliance Report & part 71 Semiannual Monitoring Report	Applies; see Permit Condition 6.24.2.	
63.2281(h)	Electronic reporting	Applies, see Permit Condition 6.23.1.	
63.2281(i)	Performance test reporting	Applies, see Permit Condition 6.26.	
63.2281(j)	CEMS performance evaluation reporting	Does not apply because PD is not required to operate a CEMS.	
63.2281(k)	Electronic reporting failure – EPA system outage	Applies; see Permit Condition 6.23.2.	
63.2281(I)	Electronic reporting failure – force majeure	Applies; see Permit Condition 6.23.3.	
63.2282(a)	Records	Applies; see Permit Conditions 6.19.1 through 6.19.3 and 7.3.2.	
63.2282(b)	Compliance records	Applies; see Permit Conditions 6.19.4 and 7.3.1.	
63.2282(c)	CEMS records	Does not apply because PD is not required to operate a CEMS.	
63.2282(d)	Emissions averaging compliance option records	Does not apply because PD has not chosen to comply with the emissions averaging compliance option.	
63.2282(e)	Catalytic oxidizer records	Applies; see Permit Condition 6.14.	
63.2283	Records retention	Applies; see Permit Conditions 6.20 and 7.3	
63.2290	NESHAP general provisions	Applies; see Permit Conditions 6.28 and 7.6.	
63.2291	Implementing authority	Applies; see Permit Conditions 6.27 and 7.5 for incorporation by reference.	
63.2292	Definitions	Applies; see Permit Conditions 6.27 and 7.5 for incorporation by reference.	

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40 CFR	Description	Applicability
Table 1A to NESHAP DDDD	Production-based compliance options	Does not apply because PD has chosen add-on control system compliance option for all softwood veneer dryer heated zones.
Table 1B to NESHAP DDDD	Add-on control systems compliance options	Applies; see Permit Condition 6.7 for row 1 selected by PD.
Table 2 to NESHAP DDDD	Operating requirements	Applies; see Permit Conditions 6.8 and 6.9 for row 2 because PD uses a catalytic oxidizer.
Table 3 to NESHAP DDDD	Work practice requirements	Applies; see Permit Condition 6.5 for row 6 for safety-related shutdown. See Permit Condition 6.6 for row 3 for minimizing fugitive emissions. See Permit Condition 7.1 for row 5 for group 1 coating operations. Row 4 does not apply because the PD has chosen the add-on control system compliance option for veneer dryer heated zone emissions including those generated when redrying.
Table 4 to NESHAP DDDD	Requirements for performance tests	Applies; see Permit Conditions 6.12.6 through 6.12.10 for rows 1 through 5. See Permit Condition 6.12.12 for row 11. These are applicable requirements for demonstrating compliance with add-on control system compliance option.
Table 5 to NESHAP DDDD	Performance testing and initial compliance demonstrations for compliance options and operating requirements	Row 2 is not applicable because the requirement to demonstrate initial compliance with the add-on control system compliance option is obsolete. All other rows are not included in the permit because PD has chosen a different compliance option.
Table 6 to NESHAP DDDD	Initial compliance demonstrations for work practice requirements	Applies; see Permit Condition 6.18.1 for row 6 related to safety-related shutdown. Rows 3 and 5 not applicable because the requirement to demonstrate initial compliance with the associated work practice requirements is obsolete. Row 4 not applicable because veneer redrying emissions are controlled by RCO satisfying add-on control system compliance option (row 3 – now obsolete). All other rows not applicable because PD does not operate the relevant process units.
Table 7 to NESHAP DDDD	Continuous compliance with compliance and operating requirements	Applies; see Permit Conditions 6.7.1.1 and 6.8.1 for row 1, Permit Condition 6.7.1.2 and 6.9 for row 4, Permit Condition 6.7.1.3 and 6.11 for row 7. Remaining rows not

Citation		THE REPORT OF THE PARTY OF THE
40 CFR	Description	Applicability
		included in permit because Potlatch uses a catalytic oxidizer as an add-on control device, and does not use emissions averaging or THC CEMS.
Table 8 to NESHAP DDDD	Continuous compliance with work practice requirements	Applies; see Permit Conditions 6.5.1 and 6.18.2 for row 6, Permit Conditions 6.6.1 and 6.15 for row 3 and Condition 7.3.1 for row 5 because PD has softwood veneer dryers and group 1 coating operations. Row 4 does not apply because PD has chosen the add-on control system compliance option for veneer dryer heated zone emissions including those generated when redrying.
Table 9 to NESHAP DDDD	Reporting requirements	Applies; see Permit Conditions 6.24, 6.25, 6.26 and 7.4. The startup, shutdown and malfunction report requirement of row 2 is obsolete due to expiration of requirement and thus is not applicable beginning August 13, 2021.
Table 10 to NESHAP DDDD	NESHAP general provisions	Applies; see Permit Conditions 6.28 and 7.6.
Appendix A to NESHAP DDDD	Alternative procedure to determine capture efficiency around a hot press	Does not apply because PD's plywood hot presses are not an affected source.

5. Table 5: Applicability of 40 CFR part 63, subpart A to EU-2's VD-1 through VD-4 and RCO and EU-3's ES, WP and SCL

Citation 40 CFR	Description	Applicability
63.1 to 63.5	Applicability, definitions, prohibited	Applies; see Permit Conditions 6.28.2 and
	activities, construction	7.6.2 for incorporation by reference.
63.6(a) to (d)	Compliance dates	Applies; see Permit Conditions 6.28.2 and
		7.6.2 for incorporation by reference.
63.6(e)(1)(i) & (ii)	Good air pollution control practices	Does not apply. See table 10 to NESHAP
		DDDD. See applicable 40 CFR 63.2250(g)
		and Permit Conditions 6.10 and 7.2.
63.6(e)(1)(iii)	Good air pollution control practices	Applies; see Permit Conditions 6.28.2 and
	independently enforceable	7.6.2 for incorporation by reference.
63.6(e)(3)	Startup, shutdown and malfunction	Does not apply. See table 10 to NESHAP
	plan	DDDD. See applicable row 6 of Table 3 to
		NESHAP DDDD and Permit Condition 6.5.
63.6(f)(1)	Startup, shutdown and malfunction	Does not apply. See table 10 to NESHAP
	exemption	DDDD. See applicable 40 CFR 63.2250(g)
		and Permit Conditions 6.10 and 7.2.

Citation 40 CFR	Description	Applicability
63.6(f)(2) and (3)	Compliance with nonopacity	Applies; see Permit Conditions 6.28.2 and
05.0(1)(2) und (5)	emission standards	7.6.2 for incorporation by reference.
63.6(g)	Alternative nonopacity emission	Does not apply because PD has not
	standard	requested an alternative nonopacity
		emission standard.
63.6(h)	Opacity and visible emission	Does not apply because NESHAP DDDD
	standards	does not contain either opacity or visible
60.6(1)		emission standards.
63.6(i)	Compliance extensions	Does not apply because the compliance
		extension that PD was granted concluded in 2008.
63.6(j)	Presidential compliance exemption	Does not apply because the President has
03.0(j)	Fresidential compliance exemption	not exempted PD from NESHAP DDDD
		requirements.
63.7 except	Performance testing	Applies; see Permit Condition 6.28.1 and
63.7(e)(1)	G	Appendix A to permit. See table 10 to
		NESHAP DDDD. 40 CFR 63.7(e)(1) does not
		apply because NESHAP-specific testing
		provision exists at 40 CFR 63.2262(a) and
/,/,		(b). See Permit Conditions 6.12 and 6.12.1.
63.8(a) & (b)	Continuous monitoring systems	Applies; see Permit Condition 6.28.2 for
62.0	Canting	incorporation by reference.
63.8 except (c)(1)(i) and (iii)	Continuous monitoring systems	Applies; see Permit Condition 6.28.1 and Appendix A to the permit.
63.8(c)(1)(i) and	Maintain and operate CMS and	Does not apply. See table 10 to NESHAP
(iii)	develop and implement SSMP for	DDDD.
()	CMS	
63.8(d)(1) and (2)	CMS quality control	Applies; see Permit Condition 6.28.1 and
		Appendix A to the permit.
63.8(d)(3)	Written procedures for CMS	Does not apply. See table 10 to NESHAP
		DDDD. See Condition 6.19.5 which reflects
22.24.)		40 CFR 63.2282(f).
63.8(e)	CMS performance evaluation	Does not apply because PD not using a
62 9/f\/1\ through	Alternative menitoring	CEMS. See Table 10 to NESHAP DDDD.
63.8(f)(1) through (5)	Alternative monitoring	Applies; see Permit Condition 6.28.2 for incorporation by reference. PD is not
(5)		currently employing an alternative
		monitoring
63.8(f)(6)	Alternative to relative accuracy test	Does not apply because PD not using a
	,	CEMS. See table 10 to NESHAP DDDD.
63.8(g)	Reduction of monitoring data	Applies; see Permit Condition 6.28.1 and
		Appendix A to permit.
63.9(a)	Notification requirements	Applies; see Permit Condition 6.28.2 for
	applicability and general	incorporation by reference.
60.0(1.)	information	
63.9(b)	Initial notifications	Does not apply because the requirements
		are obsolete.

Citatia	Appendix B		
Citation 40 CFR	Description	Applicability	
63.9(c) & (d)	Compliance extension and special	Does not apply. Compliance extension has	
	compliance requirements.	expired, and Permittee is not subject to	
62.0(-)	Notification of nonformation to the	special compliance requirements.	
63.9(e)	Notification of performance test	Applies; see Permit Condition 6.28.1 and Appendix A to permit.	
63.9(f)	Notification for opacity and visible	Does not apply because PD is not required	
03.9(1)	emissions observations	to conduct such observations.	
63.9(g)(1)	Additional notifications when using	Applies; see Permit Condition 6.28.1 and	
00.0(8)(1)	CMS	Appendix A.	
63.9(g)(2) & (3)	Notification for COMS & CEMS	Does not apply because PD is not subject	
,		to an opacity emission standard and	
		because PD is not required to operate a	
		CEMS.	
63.9(h), except	Notification of compliance status	Applies, see Permit Condition 6.28.1 and	
(h)(5)		Appendix A to permit. 63.9(h)(2) is not	
		applicable because NESHAP DDDDD only	
		requires an initial notification of	
		compliance status be submitted. That	
		requirement is obsolete and thus not	
		applicable. 63.9(h)(5) is not applicable	
		because PD is not required to submit an	
63.9(i) to (k)	Change in deadlines and submitted	application for approval of construction. Applies, see Permit Condition 6.28.1 and	
03.9(I) to (K)	information, electronic submissions	Appendix A to permit.	
63.10(a)	Administrative provisions for	Applies; see Permit Conditions 6.28.2 and	
03.10(a)	recordkeeping/reporting	7.6.2 for incorporation by reference.	
63.10(b) except	General recordkeeping	Applies; see Permit Conditions 6.28.2 and	
(2)(i), (ii), (iv) and	requirements	7.6.2 for incorporation by reference.	
(v)	·	, ,	
63.10(b)(2)(i)	Recordkeeping of occurrence and	Does not apply. See table 10 to NESHAP	
	duration of startups and shutdowns	DDDD. See applicable 40 CFR 63.2282(a)	
		and Condition 6.19.	
63.10(b)(2)(ii)	Recordkeeping of failures to meet a	Does not apply. See table 10 to NESHAP	
	standard	DDDD. See applicable 40 CFR 63.2282(a)	
		and Condition 6.19.	
63.10(b)(2)(iv)	Actions taken to minimize	Does not apply. See table 10 to NESHAP	
and (v)	emissions during SSM	DDDD.	
63.10(b)(3)	Applicability determinations	Applies; see Permit Conditions 6.28.2 and	
62 10(a) assault	Additional requirements for	7.6.2 for incorporation by reference. Applies, see Permit Condition 6.28.1 and	
63.10(c), except (c)(7), (8) & (15)	Additional requirements for sources with CMS	Appendix A to permit.	
63.10(c)(7) & (8)	Recordkeeping for excess emissions	Does not apply. See Table 10 to 40 CFR	
55.10(C)(7) & (O)	and parameter monitoring	part 63, subpart DDDD.	
	exceedances	, pa. (50) 500 pa. (555 b.	
63.10(c)(15)	Use of SSMP	Does not apply. See table 10 to 40 CFR	
		part 63, subpart DDDD.	
63.10(d)(1) & 2	General and performance test	Applies, see Permit Condition 6.28.1, 7.6.1	
, , , , , , , , , , , , , , , , , , ,	reporting	and Appendix A to permit.	

Citation	Description	Applicability
40 CFR	·	., ,
63.10(d)(3)	Reporting results of visible emission	Does not apply because PD not required to
	observations	conduct visible emissions observations
63.10(d)(4)	Compliance extension compliance	Does not apply because the compliance
	reports	extension that PD was granted concluded
		in 2008.
63.10(d)(5)	Startup, shutdown malfunction	Does not apply. See table 10 to 40 CFR
	reports	part 63, subpart DDDD. See applicable 40
		CFR 63.2281(d) and (e) and Permit
		Conditions 6.25.58 and 6.25.9.
63.10(e)(1)	Additional reporting requirements	Does not apply because PD does not
	for source with CEMS	employ CEMS.
63.10(e)(2)	Reporting results of CMS	Applies, see Permit Condition 6.28.1 and
	performance evaluations	Appendix A to permit.
63.10(e)(3)	Excess emissions and CMS	Does not apply. See table 10 to 40 CFR
	performance report and/or summary	part 63, subpart DDDD.
	report	
63.10(e)(4)	Reporting COMS data with	Does not apply because PD not required to
	performance test report	employ a COMS.
63.10(f)	Waiver of recordkeeping/reporting	Applies; see Permit Condition 6.28.2 and
		7.6.2 for incorporation by reference.
63.11	Flares and monitoring VOC leaks	Does not apply because PD not required to
		flare emissions and not required to
		monitor VOC leaks.
63.12 to 63.14	Delegations, addresses and	Applies; see Permit Conditions 6.28.2 and
	incorporation by reference	7.6.2 for incorporation by reference.
63.15	Availability of information and	Applies; see Permit Conditions 6.28.2 and
	confidentiality	7.6.2 for incorporation by reference.
63.16	Performance Track provisions	Does not apply because facility is not a
	·	Performance Track member facility

6. Table 6: Applicability of 40 CFR part 60, subpart IIII to EU-4's IC-1 and IC-2

Citation 40 CFR	Description	Applicability
60.4200(a)	General applicability	Applies; see Permit Condition 8.12 for incorporation by reference. See 40 CFR 60.4200(a)(2)(ii) for specific provision applicable to installed engines.
60.4200(b)	Applicability for engines being tested at test cell/stand	Does not apply because the installed engines are not tested at an engine test cell/stand.
60.4200(c)	part 71 permit exemption for area sources	Does not apply because SMC is a Title V major source.
60.4200(d)	Eligibility for exemption from NSPS IIII requirements pursuant to 40 CFR 1068	Applicability not determined, and provision not included in permit. PD has not requested an exemption.
60.4200(f)	Temporary replacement engines	Does not apply because the installed engines are not acting as temporary replacement engines.
60.4201	Emission standards for non- emergency CI engines	Does not apply because installed engines are emergency engines.
60.4202(d) & 60.4205(c)	Emission standards for emergency fire pump CI engines with a maximum engine power between 175 and 750 HP model year 2009 and later	Applies; see Permit Condition 8.3. Inapplicable requirements are excluded based upon installed engine's emergency fire pump designation, model year, power rating.
60.4206	Emission standard compliance duration	Applies; see Permit Condition 8.4.
60.4207	Fuel requirements	Applies; see Permit Condition 8.6.
60.4208	Installation and import restrictions	Does not apply because the requirements are obsolete.
60.4209(a)	Monitoring requirements for emergency engines that do not meet the standards applicable to non-emergency engines	Applies, see Permit Condition 8.8.
60.4209(b)	Monitoring requirements for engines equipped with diesel particulate filter to comply with emission standards in 60.4204	Does not apply because installed engines are not required to comply with emission standards in 60.4204
60.4210	Compliance requirements for manufacturers	Does not apply because PD is the owner and operator of the installed engines, not the manufacturer.
60.4211(a) & (c)	Compliance requirements for owners and operators	Applies; see Permit Condition 8.4.
60.4211(b)	Compliance requirements for fire pump engines manufactured prior to the model years listed in Table 3 to NSPS IIII	Does not apply because installed engines are for model years coming after the model years listed in Table 3 to NSPS IIII for engine power rating of installed engines.

Appendix B		
Citation 40 CFR	Description	Applicability
60.4211(d)	Compliance demonstration for certain engines that must comply with 60.4204(c) and or 60.4205(d)	Does not apply because the installed engines are not required to comply with the emission standards specified in 40 CFR 60.4204(c) & 60.4205(d).
60.4211(e)	Compliance demonstration for modified or reconstructed engines	Does not apply because the installed engines are reported by PD to have been neither modified nor reconstructed.
60.4211(f)	Emergency engine designation	Applies; see Permit Condition 8.5. DC Circuit Court of Appeals vacated 40 CFR 60.4211(f)(2)(ii) & (iii) in mandate issued May 4, 2016.
60.4211(g)	Compliance demonstration for decertified engines	Applies if installed engines become decertified; Permit Condition 8.4.6.
60.4211(h)	Requirements for engines equipped with AECD.	Does not apply as installed engines are not equipped with AECD.
60.4212	Test methods and procedures for engines with displacement less than 30 liters per cylinder	Does not apply because testing of the installed engines is not required by other provisions of NSPS IIII.
60.4213	Test methods and procedures for engines with displacement less than 30 liters per cylinder	Does not apply because installed engines have displacement less than 30 liters per cylinder.
60.4214(a)	Recordkeeping for certain non- emergency engines	Does not apply because installed engines are emergency engines.
60.4214(b)	Recordkeeping for emergency engines	Applies; see Permit Condition 8.9.
60.4214(c)	Recordkeeping for engines equipped with a diesel particulate filter	Does not apply because installed engines are not equipped with a diesel particulate filter
60.4214(d)	Annual reporting of emergency engine operation in non-emergency situation	Applies; see Permit Condition 8.11.
60.4214(e)	Reporting the use of AECD.	Does not apply because installed engines are not equipped with AECD.
60.4215	Requirements for engines used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands	Does not apply because installed engines are not located in any of the designated areas.
60.4216	Requirements for engines used in Alaska	Does not apply because installed engines are not located in Alaska
60.4217	Requirements for engines using special fuels	Does not apply because installed engines do not use special fuels
60.4218 60.4219	NSPS general provisions Definitions	Applies; see Permit Condition 8.13. Applies; see Permit Condition 8.12 for incorporation by reference.

Citation	Description	Applicability
40 CFR	•	,
Tables 1 & 2 to	Emissions standards for non-	Does not apply because installed engines
NSPS IIII	emergency engines and emergency	are fire pump engines.
	engines that are not fire pump engines	
Table 3 to NSPS	Certification requirements for fire	Applies; see Permit Condition 8.12
IIII	pump engines	
Table 4 to NSPS	Emission standards for fire pump	Applies; see Permit Condition 8.3
IIII	engines	
Table 5 to NSPS	Labeling and recordkeeping	Applies; see Permit Condition 8.12
IIII	requirements for new stationary	
	emergency engines	
Table 6 to NSPS	Optional 3-Mode Test Cycle for	Does not apply because PD is the owner
IIII	Manufacturers Fire Pump Engines	and operator of the installed engines, not the manufacturer.
Table 7 to NSPS	Requirements for Performance	Does not apply because installed engines
IIII	Tests for Engines with	do not have displacement ≥ 30 liters per
	Displacement ≥ 30 liters per	cylinder.
	cylinder	
Table 8 to NSPS	NSPS general provisions	Applies; see Permit Condition 8.13.

7. Table 7: Applicability of 40 CFR part 60, subpart A to EU-4's IC-1 and IC-2

Citation 40 CFR	Description	Applicability
60.1 to 60.3	Applicability, definitions and units	Applies; see Permit Condition 8.13 for
60.44.)		incorporation by reference
60.4(a)	Reporting address	Applies; see Permit Condition 8.13 for
		incorporation by reference. See also 3.40
		for the current address for reporting to
		Region 10, including NSPS submittals.
60.4(b)	Delegation	Applies; see Permit Condition 8.13 for
		incorporation by reference.
60.5 & 60.6	Construction and review of plans	Applies; see Permit Condition 8.13 for
		incorporation by reference.
60.7	Notification and recordkeeping	Does not apply. Pursuant to subpart IIII's
		table 8, 40 CFR 60.7 applies to the extent
		specified in 40 CFR 60.4214(a). The
		provisions in 40 CFR 60.4214(a) apply to
		certain non-emergency stationary CI ICE
		that are not certified. EU-4's IC-1 and IC-2
		are emergency stationary CI ICE. The 40
		CFR 60.7 requirements specified in 40 CFR
		60.4214(a) do not apply to PD.

Appendix B		
Citation 40 CFR	Description	Applicability
60.8	Performance tests	Does not apply. subpart IIII's table 8 states that 40 CFR 60.8 requirements apply only to stationary CI ICE with displacement ≥ 30 liters per cylinder and engines that are not certified. Neither EU-4's IC-1 nor IC-2 is a CI ICE with displacement ≥ 30 liters per cylinder. Both IC-1 and IC-2 are certified by manufacturer to comply with the fire pump engine standards in table 4 to NSPS IIII. Thus, PD is not required to comply with the requirements presented in 40 CFR 60.8.
60.9 & 60.10	Availability of information and state authority	Applies; see Permit Condition 8.13 for incorporation by reference.
60.11	Compliance with standards	Does not apply. Pursuant to subpart IIII's table 8, 40 CFR 60.11 requirements do not apply. Requirements are specified in subpart IIII.
60.12	Circumvention	Applies; see Permit Conditions 8.14 and 8.13 for incorporation by reference.
60.13	Monitoring	Does not apply. subpart IIII's Table 8 states that 40 CFR 60.13 requirements apply only to stationary CI ICE with displacement ≥ 30 liters per cylinder. Neither EU-4's IC-1 nor IC-2 is a CI ICE with displacement ≥ 30 liters per cylinder. Thus, PD is not required to comply with the requirements presented in 40 CFR 60.13.
60.14 – 60.17	Modification, reconstruction, priority list and incorporations by reference	Applies; see Permit Condition 8.13 for incorporation by reference.
60.18	Control devices	Does not apply because subpart IIII's table 8 states that this provision is not applicable.
60.19	General notification and reporting	Applies; see Permit Condition 8.13 for incorporation by reference.

8. Table 8: Applicability of 40 CFR part 63, subpart DDDDD to EU-1's CE Boiler and Riley Boiler

	and Kney Boner			
Citation 40 CFR	Description	Applicability		
63.7480, 63.7485, 63.7490, 63.7491,	Purpose, applicability, affected source, compliance date, boiler subcategories	Applies, see Permit Condition 5.28 for incorporation by reference.		
63.7495, 63.7499 63.7500(a), (f)	Emission limits, work practice standards and operating limits	Applies; see Permit Conditions 5.5, 5.6, 5.7 and 5.8. Conditions do not reflect portion of 63.7500(a)(2) related to alternative monitoring. That provision is applicable if triggered. PD has not submitted a request for alternative monitoring.		
63.7500(b)	Alternative work practice standard	Applicable if triggered. PD has not requested an alternative work practice standard.		
63.7500(c), (d) and (e)	Tune-up provision for certain units	Does not apply because boilers are not limited-use boilers, have heat input greater than 5 MMBtu/hr and do not burn gas.		
63.7505(a)	Emission limits, work practice standards and operating limits	Applies; see Permit Conditions 5.5, 5.6, 5.7 and 5.8.		
63.7505(c)	Methods for demonstrating compliance.	Applies; see Permit Condition 5.5, 5.9 and 5.27.		
63.7505(d)	Site-specific monitoring plan	Applies; see Permit Condition 5.17.		
63.7505(e)	Startup and Shutdown Plan for sources choosing to comply with definition (2) of startup in 40 CFR 63.7575	Applies to those startups for which PD invokes "startup" definition (2); see Permit Condition 5.6.2.		
63.7510	Initial compliance requirements	Does not apply because the requirements are obsolete.		
63.7515(a), (b), (c) and (g)	Subsequent performance tests	Applies; see Permit Condition 5.9.		
63.7515(d)	Boiler tune-up	Applies; see row 1 of Table 5-4 to Permit Condition 5.6.		
63.7515(e)	Demonstrating compliance with HCl, Hg and TSM limits based on fuel analysis	Does not apply because PD demonstrates compliance with HCl, Hg and PM through performance testing.		
63.7515(f)	Subsequent performance test reporting	Applies; see Permit Condition 5.22.1.		
63.7515(h)	Performance testing for certain sources burning light liquid	Does not apply because PD does not burn light liquid.		
63.7515(i)	Performance testing for certain sources with CO CEMS	Does not apply because PD does not operate a CO CEMS		
63.7520 63.7521	Stack test procedures Fuel analysis procedures	Applies; see Permit Condition 5.10. Does not apply pursuant to 40 CFR 63.7510(a)(2)(i) because PD burns a single		

Citation	Appendix B		
40 CFR	Description	Applicability	
		fuel type. Biomass is considered one fuel	
		type pursuant to definition of "fuel type"	
		at 40 CFR 63.7575. Individual fuel types	
		received from different suppliers are not	
		considered new fuel types. In other words,	
		biomass is biomass.	
63.7522	Emissions averaging	Does not apply because PD has not chosen	
		this compliance option.	
63.7525(a)	Oxygen analyzer monitoring requirements	Applies; see Permit Condition 5.14.	
63.7525(a)(1) to	CO CEMS monitoring requirements	Does not apply because PD has chosen to	
(6)	Co ceivis monitoring requirements	employ an oxygen analyzer rather than a	
(0)		CO CEMS.	
63.7525(a)(7)	Oxygen trim system	Applies should PD install and operate an	
		oxygen trim system; see Permit Condition	
		5.7.2.2.	
63.7525(b)	PM CPMS requirement	Does not apply because neither boiler has	
		an average annual heat input rate greater	
		than 250 MMBtu/hr.	
63.7525(c)	COMS requirement	Applies; see Permit Condition 5.13	
63.7525(d)	CMS requirement	Applies; see Permit Conditions 5.16	
63.7525(e)	Flow monitoring system	Does not apply because PD is not	
		employing a flow monitoring system.	
		Equipment to collect steam generation	
		data is not a flow monitoring system.	
63.7525(f)	Pressure monitoring system	Does not apply because PD is not	
		employing a control device for which this	
		monitoring is required.	
63.7525(g)	pH monitoring system	Does not apply because PD is not	
		employing a control device for which this	
		monitoring is required.	
63.7525(h)	Secondary electric power monitoring	Does not apply because PD is not	
		employing a control device (wet ESP) for	
		which this monitoring is required.	
63.7525(i)	Sorbent injection rate monitoring	Does not apply because PD is not	
		employing a control device for which this	
		monitoring is required.	
63.7525(j)	Fabric filter bag leak detection	Does not apply because PD is not	
		employing a control device for which this	
		monitoring is required.	
63.7525(k)	Limited-use boiler	Does not apply because neither installed	
62.7525//\	LICL and Lig CENAS	boiler qualifies as a limited-use boiler.	
63.7525(I)	HCl and Hg CEMS	Does not apply because PD has chosen a	
		compliance option not requiring use of	
C2 7F2F/\	CO. CENC for contain will	either a HCl or Hg CEMS.	
63.7525(m)	SO ₂ CEMS for certain units	Does not apply because PD is employing	
		neither an acid gas wet scrubber nor dry	
		sorbent injection control technology.	

Citatian	Appendix B	
Citation 40 CFR	Description	Applicability
63.7530	Demonstrating initial compliance	Applies; but only with respect to the possibility that PD chooses to
		demonstrate compliance with the Hg, HCl or TSM emissions limits through fuel
		sampling and analysis. See Permit Condition 5.27. Otherwise, the
		requirements associated with this
		provision are obsolete and thus not
		applicable as PD has already demonstrated initial compliance through
		performance testing. Note, the
		requirement at 40 CFR 63.7530(b)(1) and
		(2) to establish maximum Cl and Hg levels
		was never applicable because only one
62.7522	F#:-:	type of fuel is burned.
63.7533	Efficiency credits	Applicable if triggered.
63.7535 63.7540(a)(1)	Monitoring and data collection Operating limits not apply during	Applies; see Permit Condition 5.18. Applies; see Permit Condition 5.7.
03.7340(a)(1)	performance testing and must be	Applies, see Fermit Condition 3.7.
	reconfirmed	
63.7540(a)(2)(i)	Compliance demonstration through	Does not apply because PD is not
	fuel usage tracking	demonstrating compliance through fuel
63.7540(a)(2)(ii)	Compliance demonstration through	analysis. PD burns one type of fuel. Does not apply because PD burns one fuel
03.7340(a)(2)(II)	fuel usage tracking	type.
63.7540(a)(3) &	What if you plan to burn a new fuel,	Does not apply because PD does not
(5)	and you demonstrate compliance	demonstrate compliance through a fuel
	through fuel analysis	analysis.
63.7540(a)(4) &	What if you plan to burn a new fuel,	Applicable if triggered.
(6)	and you demonstrate compliance	
63.7540(a)(5)	through performance testing Mercury through fuel analysis	Does not apply because PD demonstrates
	linered. 7 amought rach analysis	compliance through performance testing
		rather than fuel analysis.
63.7540(a)(7)	Compliance demonstration	Does not apply because PD does not
	applicable to units employing a	employ a fabric filter.
62.7540(2\/0\	fabric filter	Door not apply because DD door not
63.7540(a)(8)	Compliance demonstration for units employing CO CEMS	Does not apply because PD does not employ a CO CEMS.
63.7540(a)(9)	Compliance demonstration for	Does not apply because PD does not
V-1V-1	certain units employing PM CPMS or	employ either a PM CPMS or a PM CEMS
	a PM CEMS	
63.7540(a)(10)	How to conduct a tune-up	Applies; see Permit Condition 5.6.4.
63.7540(a)(11)	Compliance demonstration for units	Does not apply because each boiler has
	with heat input less than 10	heat input greater than 10 MMBtu/hr
	MMBtu/hr	

Citation	Appenaix B		
Citation 40 CFR	Description	Applicability	
63.7540(a)(12)	Compliance demonstration for units	Applies should PD install and operate an	
	employing oxygen trim system	oxygen trim system; see Permit Condition 5.6.1.	
63.7540(a)(13)	Tune-up requirement for unit not operating	Applies; see Permit Condition 5.6.1.	
63.7540(a)(14)	Compliance demonstration for units employing Hg CEMS	Does not apply because PD is not employing a Hg CEMS	
63.7540(a)(15)	Compliance demonstration for units employing HCI CEMS	Does not apply because PD is not employing a HCl CEMS	
63.7540(a)(16),	Compliance demonstration through	Does not apply because PD has chosen to	
(17), (18) & (19)	performance testing of TSM	demonstrate compliance through PM performance testing and COMS	
63.7540(b)	Reporting of emission and operating limit deviations	Applies; see Permit Condition 5.26.	
63.7540(c)	Compliance demonstration for gas- fired unit	Does not apply because PD does not combust gas in either of its boilers.	
63.7540(d)	Work standards apply during startup and shutdown	Applies; see Permit Condition 5.6.	
63.7541	Emissions averaging compliance demonstration	Does not apply because PD has not chosen this compliance option.	
63.7545(a)	Notifications	Applies; see Permit Condition 5.20.	
63.7545(b)	Initial notification – existing source	Does not apply because requirement is obsolete.	
63.7545(c)	Initial notification – new source	Applies, not included in permit.	
63.7545(d)	Notification of intent to conduct performance test	Applies; see Permit Condition 5.21.	
63.7545(e)	Initial notification of compliance status (NOCS)	Applies; but only with respect to the possibility that PD chooses to demonstrate compliance with the Hg, HCl or TSM emissions limits through fuel sampling and analysis. See Permit Condition 5.27. Otherwise, the requirements associated with this provision are obsolete and thus not applicable as PD has already demonstrated initial compliance through performance testing.40 CFR 63.	
63.7545(f)	Notification requirement for certain units combusting gas	Does not apply because PD does not combust gas in either of its boilers.	
63.7550(a)	Reporting per Table 9	Applies, see Permit Condition 5.23.	
63.7550(b)(1) & (2)	First semi-annual compliance report	Does not apply because the requirements are obsolete.	
63.7550(b)(3)	Subsequent semi-annual compliance report period	Applies; see Permit Condition 5.23.	
63.7550(b)(4)	Subsequent semi-annual compliance report dates	Does not apply because different submission date established in part 71 permit.	

	Appendix B	
Citation 40 CFR	Description	Applicability
63.7550(b)(5)	Semi-annual compliance report for part 71 sources	Applies; see Permit Condition 5.23.
63.7550(c)(1)	Content of semi-annual report for limited-use boilers and boilers subject to tune-up requirement	Applies; see Permit Conditions 5.24.1 through 5.24.3, 5.24.13 and 5.24.14.
63.7550(c)(2)	Content of semi-annual report for units complying with fuel analysis requirements	Does not apply because PD has chosen compliance options that do not require it to conduct fuel analysis.
63.7550(c)(3)	Content of semi-annual report for units complying with an emission limit with performance testing	Applies; see Permit Conditions5.24.1through 5.24.3, 5.24.6 through 5.24.10 and 5.24.12, 5.24.15 & 16.
63.7550(c)(4)	Content of semi-annual report for units complying with an emission limit using a CMS	Does not apply because PD has chosen emission limit compliance options that do not require use of a CMS. The CMS that PD employ track compliance with operating limits, not emission limits.
63.7550(c)(5)(i) thru (ix)	Content of semi-annual report	Applies; see Permit Conditions 5.24.1 through 5.24.9.
63.7550(c)(5)(x)	Reporting on summary of any monthly fuel analysis	Does not apply because PD has chosen compliance options that do not require it to conduct fuel analysis.
63.7550(c)(5)(xi) thru (xiii)	Content of semi-annual report	Applies; see Permit Conditions 5.24.10 through 5.24.12.
63.7550(c)(5)(xiv)	Boiler tune-up date and burner inspection reporting	Applies; see Permit Condition 5.24.13. PD not required to report on date of most recent tune-up because that reporting requirement only applies if conducting a tune-up is the Permittee's only NESHAP DDDDD requirement.
63.7550(c)(5)(xv)	Certifying emission level achieved or control technology employed matches that reported in the NOCS	Does not apply because PD does not demonstrate compliance through emissions averaging.
63.7550(c)(5)(xvi)	Reporting CO, HCl, SO ₂ and mercury CEMS data and PM CPMS data	Does not apply because PD employs neither a CEMS nor a PM CPMS.
63.7550(c)(5) (xvii) & (xviii)	Content of semi-annual report	Applies, see Permit Conditions 5.24.14 & 15.
63.7550(d)	Content of semi-annual report for deviations not related to CMS	Applies; see Permit Condition 5.24.16.
63.7550(e)	Content of semi-annual report for CMS-related deviations from an emission limit, operating limit and monitoring requirement	Applies; see Permit Condition 5.24.17.
63.7550(h)(1)(i) & (ii)	Electronic reporting of performance test results to EPA through CEDRI	Applies; see Permit Conditions 5.22.2 and 5.22.3.
63.7550(h)(2)	Electronic reporting of CEMS performance evaluations to CEDRI	Does not apply because PD does not employ a CEMS.

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Citation 40 CFR	Description	Applicability
63.7550(h)(3)	Electronic reporting of semi-annual report	Applies; see Permit Condition 5.25.
63.7555(a)	Records of compliance reports submitted to EPA	Applies; see Permit Conditions 5.19.1 and 5.19.2 (note that (a)(3) does not apply).
63.7555(b)(1-5), except (4)	Records for CMS	Applies; see Permit Condition 5.19.3. 40 CFR 63.7555(b)(4) does not apply because PD does not employ a CEMS.
63.7555(c)	Continuous compliance records	Applies; see Permit Condition 5.19.4.
63.7555(d)(1)	Fuel usage records	Applies; see Permit Condition 5.19.5.
63.7555(d)(2)	Secondary materials as fuel records	Applies; see Permit Condition 5.19.6.
63.7555(d)(3) & (4)	Fuel analysis records	Does not apply because PD combusts one fuel type and has chosen to demonstrate compliance through performance testing for HCl and Hg.
63.7555(d)(5)	Records for reduced performance testing frequency	Applies; see Permit Condition 5.19.7.
63.7555(d)(6) & (7)	Records for malfunctions	Applies; see Permit Conditions 5.19.8 and 5.19.9.
63.7555(d)(8)	Recordkeeping for certain TSM compliance options.	Does not apply because PD has not chosen TSM compliance option.
63.7555(d)(9) & (10)	Recordkeeping for startup and shutdown	Applies; see Permit Conditions 5.19.11 and 5.19.12.
63.7555(d)(11), (12) & (13)	Recordkeeping for source selecting option 2 of "startup" in 40 CFR 63.7575 to comply with work practice standard	Applies; see Permit Conditions 5.19.13 through 5.19.15.
63.7555(e)	Recordkeeping for emissions averaging	Does not apply because PD has not chosen emissions averaging as a compliance option.
63.7555(f)	Recordkeeping for use of efficiency credits	Does not apply because PD has not chosen a compliance option that requires use of efficiency credits.
63.7555(g) & (h)	Recordkeeping for certain units that combust gas	Does not apply because neither of PD's boilers combust gas.
63.7560	Form and duration of records	Applies; see Permit Conditions 5.19.16 through 5.19.18.
63.7565	Applicability of NESHAP general provisions to NESHAP DDDDD	Applies; see Permit Condition 5.29.
63.7570	Delegation	Applies, see Permit Condition 5.29 for incorporation by reference.
Tables 1 and 14 to NESHAP DDDDD	NESHAP DDDDD – emission limits for new units	Does not apply because PD boilers are existing boilers.
Tables 2 and 15 to NESHAP DDDDD	NESHAP DDDDD – emission limits for existing units	Applies, rows 1.a, 1.b, 7.a, 7.b, 12.a and 12.b; see Permit Condition 5.5. The alternative output-based emission limits in the fourth column of each row of the table do not appear in the permit because PD

Citation		
40 CFR	Description	Applicability
		has chosen to demonstrate compliance with the emission limits in the third column. The other rows do not apply based upon the type of fuel (and whether it's wet in the case of the Riley Boiler) and boiler design PD employs.
Table 3 to NESHAP DDDDD	NESHAP DDDDD – work practice standards	Applies, rows 3, 5.a, 5.b, 5.c.1, 5.c.2, 5.d and 6; see Permit Condition 5.6. Row 1 applies if PD employs an oxygen trim system. Row 2 does not apply because the installed boilers each have a heat input capacity greater than 10 MMBtu/hr. Row 4 is obsolete and thus not applicable in that it is a one-time requirement that PD was required to have complied with prior to permit issuance.
Table 4 to NESHAP DDDDD	NESHAP DDDDD — operating limits	Applies, rows 4.a, 7 and 8; see Permit Condition 5.7. Rows 1, 2, 3 and 5 do not apply because PD does not employ the control technologies listed. Row 4.b does not apply because the installed boilers are subject to continuous compliance with an opacity operating limit. Row 6 does not apply because PD does not employ add-on air pollution control technology beyond ESP. Row 9 does not apply because PD does not employ SO ₂ CEMS.
Table 5 to NESHAP DDDDD	NESHAP DDDDD – performance testing requirements	Applies, rows 1, 3, 4 and 5; see Permit Condition 5.10.2. Row 2 does not apply because PD has chosen to comply with PM emission limit, not TSM.
Table 6 to NESHAP DDDDD	NESHAP DDDDD – fuel analysis requirements	Does not apply because PD burns a single type of fuel pursuant to 40 CFR 63.7510(a)(2)(i).
Table 7 to NESHAP DDDDD	NESHAP DDDDD – establishing operating limits	Applies, rows 1.c, 4 and 5; see Permit Condition 5.10.3. Rows 1.a and 1.b do not apply because PD does not employ a wet scrubber. Row 2 does not apply because compliance with an operating limit is not required to demonstrate continuous compliance with HCl emission limit. Row 3 does not apply because compliance with an operating limit is not required to demonstrate continuous compliance with Hg emission limit.
Table 8 to NESHAP DDDDD	NESHAP DDDDD – demonstrating continuous compliance	Applies, rows 1, 9 and 10; see Permit Conditions 5.7.1 and 5.13 for row 1, Permit Conditions 5.7.2 and 5.14 for row

Citation 40 CFR	Description	Applicability
		9, and Permit Conditions 5.7.3, 5.15.1 and 5.15.2 for row 10. Rows 2 through 8 and 11 do not apply because PD is not required to meet the operating limits or work practice standards listed.
Table 9 to NESHAP DDDDD	NESHAP DDDDD – reporting requirements	Applies, rows 1.a; see Permit Conditions 5.24.1 through 5.24.16, row 1.b; see Permit Condition 5.24.18, row 1.c; see Permit Condition 5.24.16, and row 1.d; see Permit Condition 5.24.19.
Table 10 to NESHAP DDDDD	Applicability of NESHAP general provisions to NESHAP DDDDD	Applies; see Permit Condition 5.29.
Tables 11 through 13 to NESHAP DDDDD	Alternative emission limits for certain new or reconstructed units	Does not apply because the installed boilers are neither new nor reconstructed according to statements made by PD.

9. Table 9: Applicability of 40 CFR part 63, subpart A to EU-1's CE Boiler and Riley Boiler

Citation 40 CFR	Description	Applicability
63.1 to 63.5	Applicability, definitions, prohibited	Applies; see Permit Condition 5.29.2 for
05.1 (0 05.5	activities, construction	incorporation by reference.
63.6(a) to (d)	Compliance dates	Applies; see Permit Condition 5.29.2 for
03.0(a) (0 (a)	Compilative dates	incorporation by reference.
63.6(e)	Good air pollution control practices	Does not apply. See table 10 to NESHAP
00.0(0)	Cood an ponation control practices	DDDDD. See applicable 40 CFR
		63.7500(a)(3) and Permit Condition 5.8.
63.6(f)(1)	Startup, shutdown, malfunction	Does not apply. See table 10 to NESHAP
()()	exemptions for compliance with	DDDDD.
	non-opacity emission standards	
63.6(f)(2) & (3)	Compliance with non-opacity	Applies; see Permit Condition 5.29.2 for
	emission standards	incorporation by reference.
63.6(g)	Alternative nonopacity emission	Does not apply because Permittee has not
	standard	requested an alternative nonopacity
		emission standard.
63.6(h)	Opacity and visible emission	Does not apply because the NESHAP
	standards	DDDDD opacity limit is an operating limit
		and not an emission limit. See table 10 to
		NESHAP DDDDD.
63.6(i)	Compliance extensions	Does not apply because Permittee did not
		apply for a compliance extension.
63.6(j)	Presidential compliance exemption	Does not apply because the President has
		not exempted PD from NESHAP DDDDD
		requirements.
63.7, except	Performance testing	Applies; see Permit Condition 5.29.1 and
(e)(1)		Appendix A to permit. See table 10 to
		NESHAP DDDDD. 40 CFR 63.7(e)(1) does
		not apply because NESHAP-specific testing
		provision exists at 40 CFR 63.7520(a) to (c).
63.8(a) & (b)	Continuous monitoring systems	Applies; see Permit Condition 5.29.2 for
62.0(-) (-)	CD 4C	incorporation by reference.
63.8(c) to (e),	CMS operation and maintenance,	Applies; see Permit Condition 5.29.1 and
except (c)(1)(i) &	quality control program and	Appendix A to permit. See table 10 to
(iii) & last	performance evaluation	NESHAP DDDDD. Three provisions noted
sentence of (d)(3)		are excluded because they relate to
		General Provisions SSMP requirements
63.8(f)	Alternative monitoring method	that are not applicable. Applies; see Permit Condition 5.29.2 for
03.0(1)	Alternative monitoring method	incorporation by reference. PD is not
		currently employing an alternative
		monitoring method, but Permittee may
		apply for approval of an alternative.
63.8(g)	Reduction of monitoring data	Applies; see Permit Condition 5.29.1 and
23.0(8)		Appendix A to permit.

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Citation 40 CFR	Description	Applicability
63.9(a)	Notification requirements applicability and general information	Applies; see Permit Condition 5.29.2 for incorporation by reference.
63.9(b)	Initial notifications	Does not apply because the requirements are obsolete.
63.9(c) & (d)	Compliance extension and special compliance requirements.	Does not apply. PD did not request a compliance extension, and Permittee is not subject to special compliance requirements.
63.9(e)	Notification of performance test	Applies; see Permit Condition 5.29.1 and Appendix A to permit.
63.9(f)	Notification of opacity and VE observations specified in 63.6(h)(5)	Does not apply. PD is not subject to 63.6(h)(5). See table 10 to NESHAP DDDDD.
63.9(g)(1)	Additional notifications when using CMS	Applies, see Permit Condition 5.29.1 and Appendix A to permit.
63.9(g)(2) & (3)	Notification for COMS & CEMS	Does not apply because PD is not subject to an opacity emission standard and because PD is not required to operate a CEMS.
63.9(h), except (h)(2) and (h)(5)	Notification of compliance status	Applies, see Permit Condition 5.29.1 and Appendix A to permit. 63.9(h)(2) is not applicable because NESHAP DDDDD only requires an initial notification of compliance status be submitted. That requirement is obsolete and thus not applicable. 63.9(h)(5) is not applicable because PD is not required to submit an application for approval of construction.
63.9(i) to (k)	Change in deadlines and submitted information, electronic submissions	Applies, see Permit Condition 5.29.1 and Appendix A to permit.
63.10(a)	Administrative provisions for recordkeeping/reporting	Applies; see Permit Condition 5.29.2 for incorporation by reference.
63.10(b)(1)	Retention of records	Applies, see Permit Condition 5.29.1 and Appendix A to permit.
63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(b)(2)(ii)	Recordkeeping of occurrence and duration of malfunctions	Does not apply. See table 10 to NESHAP DDDDD. See applicable 40 CFR 63.7555(d)(6) and Permit Condition 5.19.8 for recordkeeping of occurrence and duration. See applicable 63.7555(d)(7) and Permit Condition 5.19.9 for action taken during malfunctions.
63.10(b)(2)(iii)	Maintenance records	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(b)(2)(iv) & (v)	Actions taken to minimize emissions during startup, shutdown or malfunction	Does not apply. See table 10 to NESHAP DDDDD. The two provisions noted are excluded because they relate to General

Ciraria	Appendix B	
Citation 40 CFR	Description	Applicability
		Provisions SSMP requirements that are not applicable.
63.10(b)(2)(vi) to (xiv)	Other CMS requirements	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(b)(3)	Recordkeeping for applicability determinations	Does not apply. See table 10 to NESHAP DDDDD.
63.10(c)(1) to (9)	Recordkeeping for CMS	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(c)(10) & (11)	Recording nature and cause of malfunctions, and corrective actions	Does not apply. See table 10 to NESHAP DDDDD. See applicable 40 CFR 63.7555(d)(6) and Permit Condition 5.19.8 for recordkeeping of occurrence and duration. See applicable 63.7555(d)(7) and Permit Condition 5.19.9 for action taken during malfunctions.
63.10(c)(12) to (14)	Recordkeeping for CMS	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(c)(15)	Use of SSMP	Does not apply. See table 10 to NESHAP DDDDD. The provision noted is excluded because it relates to General Provisions SSMP requirements that are not applicable.
63.10(d)(1) & (2)	General and performance test reporting	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(d)(3)	Reporting results of visible emission observations	Does not apply because the NESHAP DDDDD opacity limit is an operating limit and not an emission limit. See Table 10 to NESHAP DDDDD.
63.10(d)(4)	Compliance extension compliance reports	Does not apply because Permittee did not apply for a compliance extension.
63.10(d)(5)	Startup, shutdown malfunction reports	Does not apply. See table 10 to NESHAP DDDDD. The provision noted is excluded because it relates to General Provisions SSMP requirements that are not applicable. However, note that Permittee is required to report on malfunctions in semiannual compliance report pursuant to applicable 40 CFR 63.7550(c)(5)(xiii) and Permit Condition 5.24.12.
63.10(e), except (e)(1)	Additional reporting requirements for source with CMS	Applies; see Permit Condition 5.29.1 and Appendix A to the permit.
63.10(e)(1)	Additional reporting requirements for source with CEMS	Does not apply because PD does not employ CEMS.
63.10(f)	Waiver of recordkeeping/reporting	Applies; see Permit Condition 5.29.2 for incorporation by reference.
63.11	Flares and monitoring VOC leaks	Does not apply because Permittee not required to flare emissions and not required to monitor VOC leaks

Citation 40 CFR	Description	Applicability
63.12 to 63.14	Delegations, addresses and	Applies; see Permit Condition 5.29.2 for
	incorporation by reference	incorporation by reference.
63.15	Availability of information and	Applies; see Permit Condition 5.29.2 for
	confidentiality	incorporation by reference.
63.16	Performance Track provisions	Does not apply because facility is not a
		Performance Track member facility