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Statement of Basis

Title V Air Quality Operating Permit
Permit Pre-Draft

Neucor, Incorporated

Yakama Reservation
White Swan, Washington

Purpose of Permit and Statement of Basis

Title 40 Code of Federal Regulations part 71 establishes a comprehensive air quality operating permit program under the authority of title V of the 1990 amendments to the federal Clean Air Act. The air quality operating permit is an enforceable compilation of all the applicable air pollution requirements that apply to an existing affected air emissions source. The permit is developed via a public process, may contain additional new requirements to improve monitoring of existing requirements, and contains procedural and prohibitory requirements related to the permit program itself. The permit is valid for five years and may be renewed.

This document, the statement of basis, summarizes the legal and factual basis for the permit conditions in the air quality operating permit to be issued to Neucor, Incorporated (referred to herein as Neucor facility, source, or permittee). Unlike the air quality operating permit, this document is not legally enforceable. This statement of basis summarizes the emitting processes at the facility, air emissions, permitting and compliance history, the statutory or regulatory provisions that relate to the subject facility, and the steps taken to provide opportunities for public review of the permit. The permittee is obligated to follow the terms of the permit. Any errors or omissions in the summaries provided here do not excuse the permittee from the requirements of the permit.

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Abbreviations and Acronyms

Also see 40 CFR 60.2, 60.41c, 63.2, 63.2292, 63.7575 and 71.2.

Btu	British thermal units
CAA	Clean Air Act [42 U.S.C. section 7401 et seq.]
CAM	compliance assurance monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
COMS	continuous opacity monitoring system
dscf	Dry standard cubic feet
dscm	Dry standard cubic meter
EPA	United States Environmental Protection Agency (also U.S. EPA)
ESA	Endangered Species Act
EU	Emission Unit
FARR	Federal Air Rules for Reservations
FR	Federal Register
gal	gallon(s)
gr	grains (7,000 grains = 1 pound)
HAP	hazardous air pollutant
hr	hour
lb	pound (lbs = pounds)
kPa	Kilopascals
MACT	maximum achievable control technology
m	thousand
mm	million
NEPA	National Environmental Protection Act
NESHAP	national emission standards for hazardous air pollutants (40 CFR Parts 61 and 63)
NHPA	National Historical Preservation Act
NO_x	nitrogen oxides
NSPS	new source performance standard
PM	particulate matter
PM_{10}	particulate matter less than or equal to 10 micrometers in aerodynamic diameter
$PM_{2.5}$	particulate matter less than or equal to 2.5 micrometers in aerodynamic diameter
ppmdv	parts per million on a dry, volume basis
ppmv	parts per million on a volume basis
ppmw	parts per million on a weight basis
PSD	prevention of significant deterioration
psi	pounds per square inch
PTE	potential to emit
Region 10	U.S. Environmental Protection Agency, Region 10
S	sulfur
SO_2	sulfur dioxide
tpy	tons per year
VOC	volatile organic compound

EPA Authority to Issue Title V Permits

On July 1, 1996, the EPA adopted regulations (see 61 Federal Register 34202) codified at 40 Code of Federal Regulations part 71 setting forth the procedures and terms under which the Agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to affected stationary sources in Indian Country.

As described in 40 CFR 71.4(a), the EPA will implement a part 71 program in areas where a state, local, or Tribal agency has not developed an approved part 70 program. Unlike states, Indian Tribes are not required to develop operating permit programs, though the EPA encourages Tribes to do so. See, for example, Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian Country, the EPA will administer and enforce a part 71 federal operating permit program for stationary sources until the governing Indian Tribe receives the EPA's approval to administer its own operating permit program.

1. Facility Information

1.1 Location and Yakama Reservation

The Neucor facility is located in White Swan, Washington, within the exterior boundaries of the 1855 Yakama Reservation and is in Indian Country as defined in 40 CFR part 71. The reservation was established by the Treaty of June 9, 1855 (12 Stat. 951), by which the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) ceded to the United States their aboriginal title to approximately 10 million acres in central Washington and reserved for their own use forever the Yakama Reservation. The Yakama Nation is composed of 14 Tribes and Bands: Kah-milt-pah, Klickitat, Klinquit, Kow-was-say-ee, Li-ay-was, Oche-chotes, Palouse, Pisquose, Se-ap-cat, Shyiks, Skinpa, Wenatshapam, Wishram and Yakama. The 1.4 million acre reservation is primarily in Yakima County with some land in Klickitat and Lewis Counties. The reservation is considered to be Indian Country, as defined in 40 CFR part 71.

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1.2 Facility Description

White Swan Manufacturing LLC (WSM) is a subsidiary of West Mountain View International LLC (WMVI). WSM is a holding company of the real estate and manufacturing infrastructure, which is exclusively leased to Neucor. Neucor is the operator of the facility. The Neucor facility manufactures hot-pressed panel cores from wood chips and shavings that are purchased. The title V permit is being issued to Neucor.

The primary air emission activities at the facility include fuel burning, wood fiber drying, wood production and material handling. There are two operating lines which can operate independently from each other. Each operating line contains a refiner, steam-heated tube dryer, fiber bin, mechanical

blender, fiber former, press, and cooler. The refiners, dryers, board presses require steam for operation. The facility has three boilers to produce steam. Two boilers are fuel oil-fired and one boiler is wood-fired. The facility also has a fire pump engine on-site to use for emergency purposes.

Some of the byproducts of the manufacturing process are dry wood shavings, green wood chips, and recycled material. These byproducts are stored in bins until the material is transferred off-site. Panel cores are trimmed which generates sawdust that is pneumatically conveyed to baghouses, and then to raw material bins. Core panels are also sanded to a specified depth and the sander dust is pneumatically conveyed to baghouses, and then to the raw material bins.

The air pollution emission units and control devices that exist at Neucor are listed in Table 2-1 below by emission unit identification.

Table 2-1 – Emission Units & Control Devices

EU ID	Emission Unit Description	Control Device
BLR1 - Wood-Fired Boiler #1	Wellons brand, 47.3 MMBtu/hr, wood waste fuel; installed 1984	Wellons brand multiclone and electrostatic precipitator
BLR2 - Fuel Oil-Fired Boiler #2	Donlee brand, 37.8 MMBtu/hr, No. 2 diesel; installed 1997	None
BLR3 - Fuel Oil-Fired Boiler #3	Cleaver Brooks brand, 8.4 MMBtu/hr, No. 2 diesel fuel; installed 2005	None
D1 & D2 - Dryers #1 and #2	Refiners and indirectly steam heated Westec brand dryers on lines 1 and 2; 70 ODT/day each	None for stage 1; baghouses D1 and D2 for stages 2 and 3.
LF1 & LF2 - Blenders/Formers #1 and #2	Blenders and COE brand vacuum line formers on lines 1 and 2	Carter Day brand, model 156 RF10 baghouses F1 and F2, respectively
P1 & P2 - Presses #1 and #2	Washington Iron Works brand board presses for lines 1 and 2; 53.3 msf/day 3/4” basis each	None
C1 & C2 - Board Coolers #1 and #2	Board coolers for lines 1 and 2	None
MHS - Material Handling & Sawing	Material handling to the raw material silos, truck bin cyclone, fines cyclone, plug feeder cyclones (lines 1 & 2) and from the two-pass saw	Carter Day brand, model 375 RF10 baghouse BHS
MR1 - Material Recycling Line 1	Material handling to chip bin cyclone (line 1) and recycle cyclone (line 1)	Clarks brand, model 57-20 baghouse BH1
MR2S - Material Recycling Line 2 and Sanding	Material handling to recycle cyclone (line 2) and from the sander; when only line 1 is operating only the sander in this unit operates	Clarks brand, model 57-20 baghouse BH2

EU ID	Emission Unit Description	Control Device
MNFA - Miscellaneous Nonfugitive Activities	Miscellaneous non-fugitive activities generate emissions inside buildings and are not specifically described in other emission units	Inside buildings and partial buildings; the three-walled truck dump has a panel filter to collect and control dust
MFA - Miscellaneous Fugitive Activities	Miscellaneous fugitive activities generate emissions outside buildings and are not specifically described in other emission units	None
DT - Diesel Tank	No. 2 diesel fuel storage; 10,000 gallons	None
FP - Fire Pump Engine	Detroit Diesel brand, model 6061A (671); 188 horsepower at 1750 rpm; 11.5 gallons/hour diesel fuel; 1.495 mmBtu/hr	None
PT - Plant Traffic	Plant traffic by vehicles on paved and unpaved roads generate fugitive dust emissions.	None

1.3 Local Air Quality and Attainment Status

South central Washington, including the Yakama Reservation, either attains the national ambient air quality standard for all criteria pollutants or is unclassified. An area is unclassifiable when there is insufficient monitoring data. Ambient PM_{10} and $PM_{2.5}$ data are currently being collected at a monitoring location in the city of Yakima. Ambient $PM_{2.5}$ data are also being collected at monitoring locations in White Swan, Toppenish and Sunnyside, but these data are non-regulatory. Until about 2005, ambient CO data were collected at a monitoring site in Yakima. The area experiences high ambient fine particulate matter ($PM_{2.5}$) levels, approaching and at times exceeding the ambient standard of 35 micrograms per cubic meter (ug/m^3), caused primarily by wood stove use during wintertime inversions. During the road construction season (March through November), with the exception of wildfire events, daily $PM_{2.5}$ levels measured in Wapato and Yakama, the nearest monitoring locations, rarely exceed 20 ug/m^3 and are typically around 10 ug/m^3 or less. The area is currently considered to be in attainment for PM_{10}, $PM_{2.5}$ and CO. The area is unclassified for all other pollutants.

1.4 Permitting, Construction and Compliance History

The EPA Region 10 issued minor new source review permit R10TNSR00200 to Neucor on April 19, 2016, authorizing the construction and operation of the fiberboard facility. Region 10 received a Title V operating permit application for the facility on May 12, 2017. The application was deemed complete on July 11, 2017.

The Neucor facility was previously owned and operated by Jeld-Wen. Therefore, some of the equipment and processes were already on-site and operated by Jeld-Wen prior to the facility being acquired but had not been operated since the facility ceased operation under Jeld-Wen in May 2009.

Neucor indicated in its title V application that the facility commenced operations on May 5, 2016. Per the minor new source review permit, the Neucor facility is made up of two identical production lines that can operate independent of each other and produce medium density fiberboard panels. The plant was permitted such that it would be reactivated in three stages. In Stage 1, only line 1 would operate, the line 1 dryer will be uncontrolled and the wood-fired boiler (BLR1) would not operate. In Stages 2 and 3, all emission units would operate and the dryers would be controlled by baghouses.

The minor NSR permit contains several requirements including those applicable to Wood-Fired Boiler #1 (BLR1) and five emission units operating exclusively in support of Production Line 2. These emission units include Dryer #2 (D2) controlled by baghouse D2, Blender/Former #2 (LF2) controlled by baghouse F2, Press #2 (P2), Board Cooler #2 (C2), and Material Recycling Line 2 (MR2S) controlled by baghouse BH2. However, since issuance of the minor NSR permit, Neucor reported no emissions for the six emission units noted above in its annual emission reports, indicating that none of the six emission units have been operated by Neucor. Neucor confirmed via email on June 22, 2024 that none of the emission units noted have been operated.

A chronologic summary of title V permit activities for Neucor is provided below.

May 12, 2017	The EPA receives initial title V permit application from Yakama Forest Products.
August 13, 2025	Public comment period for draft permit and statement of basis began.
September 12, 2025	Public comment period for draft permit ended.
September 16, 2025	EPA issues Title V permit with an effective date of September 16, 2025. The expiration date of this renewal is September 16, 2030.

2. Emission Inventory

2.1 Emission Inventory Basics

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

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

The equation below represents the general technique for estimating emissions (in tons per year) from each emission unit at the facility. Emissions are calculated by multiplying an emission factor by an operational parameter. To estimate actual emission, the permittee will need to track the actual operational rates. Note that emission factors may be improved over time. For those estimation

techniques that require substantial site-specific parameter tracking, such as piles and roads, emissions associated with a defined operational rate can be estimated to establish a set ratio that can be used to multiply by the actual operational rate in future years, significantly simplifying the annual inventory effort. All the techniques and site-specific parameters and assumptions should be reviewed each year before estimating emissions to be sure they remain appropriate.

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

Where:

E = pollutant emissions in tons/year

EF = emission factor (see Appendix A to this Statement of Basis)

OP = operational rate (or capacity for PTE)

K = 1 ton/2000 lbs for conversion from pounds per year to tons per year

2.2 Potential to Emit

Neucor completed and submitted EPA part 71 Operating Permit Form EMISS for all emission units as part of its title V permit application. The facility PTE that Neucor provided in its title V permit application is the same as that in the issued minor new source review permit R10TNSR00200.

A summary of Neucor's non-fugitive PTE (except for HAPs) is presented in Tables 3-1 and 3-2 below. Note that fugitive emissions are not included for non-HAP emissions because for wood products facilities, fugitive emissions are not used to determine program applicability as explained in more detail in Section 4.1 of this statement of basis. HAPs are used to determine title V applicability.

Table 3-1 – Stage #1 Neucor Potential to Emit (tpy)[1]

Emission Unit	CO	NOx	PM	PM10	PM2.5	SO2	VOC
BLR2	5.8	23.2	2.3	3.8	3.8	8.2	0.2
BLR3	1.3	5.3	0.5	0.9	0.9	1.9	0.1
D1	1.4		46.5	43.1	26.8		26.6
F1			0.04	0.04	0.04		1.3
P1	0.3	0.3	1.8	3.4	3.4		2.9
C1			0.5	0.04	0.04		1.5
MHS (line 1)			0.2	0.2	0.2		7.8
MR1			0.00002	0.00002	0.00002		0.4
MR2S (line 1)			0.03	0.03	0.03		0.01
FP	0.1	0.3	0.01	0.01	0.01	0.03	0.02
Total	8.9	29.1	51.9	51.5	35.3	10.1	40.9

Table 3-2 – Stages #2 and 3 Neucor Potential to Emit (tpy)[1]

Emission Unit	CO	NOx	PM	PM10	PM2.5	SO2	VOC
BLR1	124.0	72.5	8.1	11.6	11.6	5.2	3.5
BLR2	5.8	23.2	2.3	3.8	3.8	8.2	0.2
BLR3	1.3	5.3	0.5	0.9	0.9	1.9	0.1
D1	1.4		0.5	0.5	0.5		26.6

D2	1.4		0.5	0.5	0.5		26.6
F1			0.04	0.04	0.04		1.3
F2			0.04	0.04	0.04		1.3
P1	0.3	0.3	1.8	3.4	3.4		2.9
P2	0.3	0.3	1.8	3.4	3.4		2.9
C1			0.5	0.04	0.04		1.5
C2			0.5	0.04	0.04		1.5
MHS (line 1)			0.2	0.2	0.2		7.8
MHS (line 2)			0.2	0.2	0.2		7.8
MR1			0.00002	0.00002	0.00002		0.4
MR2S (line 1)			0.03	0.03	0.03		0.01
MR2S			0.1	0.1	0.1		1.1
FP	0.1	0.3	0.01	0.01	0.01	0.03	0.02
Total	135.0	101.9	17.2	24.9	24.9	15.3	85.6

[1] Fugitive emissions are not included in this table because fugitives are not used in applicability determinations for this source type (see Section 4.1).
[2] CO = carbon monoxide; Pb = lead; NO_X = oxides of nitrogen; PM = particulate matter; PM_{10} = inhalable coarse particulate or particulate matter with diameter 10 micrometers or less; $PM_{2.5}$ = fine particulate or particulate matter with diameter 2.5 micrometers or less; SO_2 = sulfur dioxide; VOC = volatile organic compounds; GHG = greenhouse gases; CO_{2e} = carbon dioxide equivalent; HAP = hazardous air pollutants [see CAA, Section 112(b)]; facility-wide total HAP = all HAPs totaled; facility-wide single HAP = highest individual HAP.

For miscellaneous emission generating activities that occur inside buildings, emissions are estimated to have been reduced by 80% due to being inside a building. Region 10 believes this is a conservative assumption. Additional sources of VOC and HAP, both fugitive and non-fugitive, likely exist, but emission factors for those sources are not available. For instance, it is known that logs, lumber and byproducts lose turpentine over time, and turpentine content relates to VOC emissions, and some portion of the VOC emissions tend to be HAPs.

For more information regarding the emissions analysis of fugitive and non-fugitive emissions sources of emissions for the Neucor facility, please refer to Appendix A of the permit analysis for Permit R10TNSR00200.

3. Regulatory Analysis and Permit Content

The EPA is required by 40 CFR part 71 to include in this title V permit all emission limitations and standards that apply to the facility, including operational, monitoring, testing, recordkeeping and reporting requirements necessary to assure compliance. This section explains which air quality regulations apply to this facility and how those requirements are addressed in the permit.

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

The EPA relied on information provided in Neucor's title V permit application, Neucor's 2016 minor new source review permit, and on supplementary information provided by Neucor to determine the requirements that are applicable to the facility. Future modifications to the facility could result in additional requirements.

3.1 Federal Air Quality Requirements

Title V Operating Permit Program. Title V of the CAA and the implementing regulation found in 40 CFR part 71 require major sources (as well as a selection of non-major sources) of air pollution to obtain operating permits and form the legal bases for this permit. A source is major for title V purposes if it has the potential to emit 100 tons per year or more of any air pollutant subject to regulation, 25 tons per year or more of hazardous air pollutants (totaled) or 10 tons per year or more of any single hazardous air pollutant (see 40 CFR 71.2). Neucor's facility is a major source subject to title V because it has the potential to emit more than 100 tons per year of CO and NO_X. (see Tables 3-1 and 3-2).

The title V operating permit serves as a comprehensive compilation of the air quality requirements that are applicable to a source. The permit also must assure compliance, so source-specific testing, monitoring, recordkeeping and reporting have been added where the EPA believes it is necessary, as explained in Section 5.1 (Permit Conditions) of this statement of basis below.

Prevention of Significant Deterioration. Under the PSD pre-construction permitting program found in part C of title I of the CAA and 40 CFR 52.21, no "major stationary source" or "major modification" to a major stationary source can begin actual construction without first obtaining a PSD permit. In general, a major stationary source for purposes of the PSD program is a source with a PTE of more than 250 tons per year of any PSD pollutant. Based upon our knowledge of the facility and understanding of its potential emissions and existing limitations, the facility is considered a minor source with respect to the PSD program.

New Source Performance Standards. Four combustion-related NSPS may apply to the three boilers and three tank-related NSPS may apply to the fuel oil and propane fuel tanks at the Neucor facility. Boiler #1 operates on wood, Boiler #2 operates on fuel oil and propane as a backup fuel source, and Boiler #3 operates on fuel oil.

The boilers are not subject to 40 CFR Part 60, subparts D and Da because the boilers each have a heat input capacity less than 250 mmBtu/hr. They are not subject to subpart Db because the boilers each have a heat input capacity less than 100 mmBtu/hr. Boilers #1, #2, and #3 are rated 47.3 mmBtu, 37.8 mmBtu/hr, and 8.4 mmBtu/hr respectively, well below the size cut off for each of those subparts. Boiler #2 is subject to subpart Dc which applies to boilers built after June 9, 1989, that burn fossil fuel with a heat input capacity greater than 10 mmBtu/hr. NSPS subpart Dc requirements that do not apply to the Neucor facility are not included in the permit; requirements that apply but do not create specific requirements for Neucor are also not included in the permit. Table 4-1 shows the applicability of each boiler and Table 4-2 explains whether specific requirements of subpart Dc apply to Boiler #2 and where the requirements are located in the permit.

Table 4-1 – Boilers NSPS Applicability, 40 CFR Part 60

	40 CFR Part 60, Subpart D Criteria: Fossil-fuel-fired steam generating unit with capacity of more than 250 MMBtu/hr	40 CFR Part 60, Subpart Da Criteria: Electric utility fossil-fuel-fired steam generating unit with capacity of more than 250 MMBtu/hr	40 CFR Part 60, Subpart Db Criteria: Steam generating unit with capacity of more than 100 MMBtu/hr	40 CFR Part 60, Subpart Dc Criteria: Steam generating unit built after June 9, 1989, that burn fossil fuel with a heat input capacity greater than 10 MMBtu/hr
Boiler #1 47.3 MMBtu/hr Wood waste fuel Installed 1984	Not applicable	Not applicable	Not applicable	Not applicable
Boiler #2 37.8 MMBtu/hr No. 2 diesel fuel Installed 1997	Not applicable	Not applicable	Not applicable	Applicable
Boiler #3 8.4 MMBtu/hr No. 2 diesel fuel Installed 2005	Not applicable	Not applicable	Not applicable	Not applicable

Table 4-2 – NSPS Subpart Dc Applicability, 40 CFR Part 60

CITATION	REQUIREMENT	APPLICABLE?
60.40c	Applicability: (a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).	Applies to Boiler #2 because it is 37.8MMBtu, but no applicable requirements in this subsection.
60.41c	60.41c Definitions. As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.	No applicable requirements in this subsection.
60.42c, (a)-(c)	60.42c Standard for sulfur dioxide (SO2). Standards for affected facilities burning coal.	No – Boiler #2 only combust fuel oil and propane.
60.42c, (d)	60.42c Standard for sulfur dioxide (SO_2). (d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO2in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.	Applicable – Boiler #2 combusts fuel oil. Per the NSR permit and FARR, only liquid fuels that contain 0.05 percent sulfur by weight or less can be combusted. Therefore, the alternative method of compliance for this condition applies. Permit Condition 4.2.

60.42c, (e)	60.42c Standard for sulfur dioxide (SO_2). (e) Standards for affected facilities combusting coal or oil with any other fuels.	Yes – Boiler #2 combusts oil and propane. Neucor complies with the emission limit for SO_2 by combusting oil that contains no more than 0.05 percent sulfur by weight. No applicable requirements in this subsection.
60.42c, (f)	60.42c Standard for sulfur dioxide (SO_2). (f) Reduction in the potential SO_2 emission rate through fuel pretreatment is not credited toward the percent reduction requirement under paragraph (b)(2) of this section unless…	No – Boiler #2 is not subject to the requirement under paragraph (b)(2).
60.42c, (g)	60.42c Standard for sulfur dioxide (SO_2). (g) Except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits, and emission limits of this section shall be determined on a 30-day rolling average basis.	Yes – Boiler #2 combusts fuel oil. However, it is assumed that Boiler #2 compliance with fuel oil sulfur limits will be determined based on certifications from fuel supplier as provided under paragraph (h). No applicable requirements in this subsection.
60.42c, (h)	60.42c Standard for sulfur dioxide (SO_2). (h) For affected facilities listed under paragraphs (h)(1), (2), (3) or (4) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable. (1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr). (2) Residual oil-fired affected facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). (3) Coal-fired facilities with heat input capacities between 2.9 and 8.7 MW (10 and 30 MMBtu/hr). (4) Other fuels-fired affected facilities with heat input capacities between	Yes – Boiler #2 is subject to (h)(1) as it is oil-fired with a heat input between 10 and 100 MMBtu/hr. Permit Condition 6.7.

	2.9 and 8.7 MW (10 and 30 MMBtu/h)	
60.42c, (i)	60.42c Standard for sulfur dioxide (SO_2). (i) The SO_2 emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction.	Yes – Boiler #2 combusts fuel oil. The fuel oil sulfur limit will be 0.05 percent sulfur by weight. Permit Condition 6.8.
60.42c, (j)	60.42c Standard for sulfur dioxide (SO_2). (j) For affected facilities located in noncontinental areas and affected facilities complying with the percent reduction standard…	No – Neucor is not located in a noncontinental area.
60.43c, (a)-(b)	60.43c Standards for Particulate Matter (PM) Establishes PM standards for coal and wood fired units.	No – Boiler #2 only combusts fuel oil and propane.
60.43c, (c)	60.43c Standards for Particulate Matter (PM) (c) Establishes opacity standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	Yes – Boiler #2 combusts fuel oil and has a heat input capacity of greater then 30 MMBtu/h. Permit Condition 6.9.
60.43c, (d)	60.43c Standards for Particulate Matter (PM) (d) Requires that the PM and opacity standards of this section apply at all times, except during periods of startup, shutdown or malfunction.	Yes – Boiler #2 is subject to PM or opacity standards of 40 CFR Part 60. Permit Condition 6.10.
60.43c, (e)	60.43c Standards for Particulate Matter (PM) (e) Establishes PM standards for coal, wood and oil fired units with a heat input capacity greater than 30 MMBtu/hr.	No – Boiler #2 combusts fuel oil and has a heat input capacity of greater then 30 MMBtu/h, but it was constructed prior to February 28, 2005.
60.44c, (a)-(g), (i)-(j)	60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide	Yes – Boiler #2 is subject to SO_2 standards of 40 CFR Part 60. Boiler #2 is also subject to 60.42c(h) and can therefore demonstrate compliance with SO_2 standards based on fuel supplier

		certification. No applicable requirements in this subsection.
60.44c, (h)	60.44c Compliance and Performance Test Methods and Procedures for Sulfur Dioxide. (h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable.	Yes – Boiler #2 is subject to SO_2 standards of 40 CFR Part 60 and it is assumed that the owner and operator will demonstrate compliance with the SO_2 standard based on fuel supplier certification. Permit Condition 6.11.
60.45c(a)	60.45c Compliance and Performance Test Methods and Procedures for Particulate Matter	Yes – Boiler #2 is subject to opacity standard testing under (a)(8). Permit Condition 6.12.
60.45c(b-d)	60.45c Compliance and Performance Test Methods and Procedures for Particulate Matter	No – Boiler #2 is not subject to the requirements under 60.45c(b-d).
60.46c, (a-d)	60.46c Emissions Monitoring for Sulfur Dioxide	Yes – Boiler #2 combusts fuel oil. However, it is assumed that Boiler #2 compliance with fuel oil sulfur limits will be determined based on certifications from fuel supplier as provided under paragraph 60.42(h). No applicable requirements in this subsection.
60.46c, (e)	60.46c Emissions Monitoring for Sulfur Dioxide (e) The monitoring requirements of paragraphs (a) and (d) of this section shall not apply to affected facilities subject to §60.42c(h) (1), (2), or (3) where the owner or operator of the affected facility seeks to demonstrate compliance with the SO_2 standards based on fuel supplier certification, as described under §60.48c(f), as applicable.	Yes – Boiler #2 is subject to SO_2 standards of 40 CFR Part 60 and it is assumed that the owner and operator will demonstrate compliance with SO_2 standards based on fuel supplier certification. Not included in the permit as this section does not create a specific requirement.

60.46c, (f)	The owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section, or conducting as-fired fuel sampling pursuant to paragraph (d)(1) of this section, shall obtain emission data for at least 75 percent of the operating hours in at least 22 out of 30 successive steam generating unit operating days.	Yes – Boiler #2 is subject to SO_2 standards of 40 CFR Part 60. However, if the owner and operator relies on fuel supplier certification to demonstrate compliance with SO_2 standards, then installation of a CEMS is not required. No applicable requirements in this subsection.
60.47c	60.47c Emissions Monitoring for Particulate Matter	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. However, if the owner and operator burns only distallate oil that contains no more than 0.5 weight percent sulfur, the installation and operation of a COMS is not required. No applicable requirements in this subsection.
60.48c, (a)	60.48c Reporting and Recordkeeping Requirements (a) The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part.	Applies, but this has already occurred.
60.48c, (b)	60.48c Reporting and Recordkeeping Requirements (b) The owner or operator of each affected facility subject to the SO_2 emission limits of §60.42c, or the PM or opacity limits of §60.43c, shall submit to the Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. Permit Condition 6.13.

60.48c, (c)	60.48c Reporting and Recordkeeping Requirements (c) In addition to the applicable requirements in §60.7, the owner or operator of an affected facility subject to the opacity limits in §60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period and maintain records according to the requirements specified in paragraphs (c)(1) through (3) of this section, as applicable to the visible emissions monitoring method used.	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. Permit Condition 6.14.
60.48c, (d)	60.48c Reporting and Recordkeeping Requirements (d) The owner or operator of each affected facility subject to the SO_2 emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit reports to the Administrator.	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. Permit Condition 6.15.
60.48c, (e)	60.48c Reporting and Recordkeeping Requirements (e) The owner or operator of each affected facility subject to the SO_2 emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records and submit reports as required under paragraph (d) of this section, including the following information, as applicable.	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. Permit Condition 6.15.
60.48c, (f)	60.48c Reporting and Recordkeeping Requirements (f) Fuel supplier certification shall include the following information…	Yes – Boiler #2 is subject to PM and opacity standards of 40 CFR Part 60. Permit Condition 6.16.

60.48c, (g)	60.48c Reporting and Recordkeeping Requirements (g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day…	Applies. Permit Condition 6.17.
60.48c, (h)	60.48c Reporting and Recordkeeping Requirements (h) The owner or operator of each affected facility subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels under §60.42c or §60.43c shall calculate the annual capacity factor individually for each fuel combusted. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of the calendar month.	Does not apply because Neucor does not have an annual capacity factor limit.
60.48c, (i)	60.48c Reporting and Recordkeeping Requirements (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.	Applies. Permit Condition 6.17.
60.48c, (j)	60.48c Reporting and Recordkeeping Requirements (j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.	Applies. Permit Condition 6.17.

The diesel storage tank is not subject to 40 CFR part 60, subparts K and Ka because each tank has a storage capacity less than 40,000 gallons. The propane fuel tank is not subject to subpart Kb because the tank is a pressure vessel designed to operate in excess of 204.9 kPa with no emission to the atmosphere. The vapor pressure of propane is about 102 psi or 703 kPa.

Because 40 CFR part 60, subpart Dc applies to Boiler #2, subpart A of part 60 also applies, as explained in 60.1(a). NSPS subpart A requirements that do not apply to the Neucor facility are not included in the

permit; requirements that apply but do not create specific requirements for Neucor are also not included in the permit. Table 4-3 explains whether specific requirements of subpart A apply to Boiler #2 and where the requirements are located in the permit.

Table 4-3 – NSPS Subpart A Applicability, 40 CFR Part 60

Citation	Description	Applicability
60.1 – 60.3	Applicability, definitions and units	Apply, but are not included in the permit.
60.4(a)	Reporting address	Applies; see Permit Condition 3.40 for the current instructions for reporting to Region 10, including NSPS submittals.
60.4(b)	Delegation	Applies, but are not included in the permit.
60.5 – 60.6	Construction and review of plans	Apply, but are not included in the permit.
60.7(a)(1, 3)	Initial notification	One-time requirement. 60.7(a)(1) is past and 60.7(a)(3) is Permit Condition 4.24.
60.7(a)(4)	Modification notification	Applies; see Permit Condition 4.28.
60.7(a)(5, 7)	CMS notification	Does not apply because Boiler #2 does not rely on CMS or COMS to comply with NSPS.
60.7(a)(6)	Opacity notification	Applies because opacity provisions of Subpart Dc apply to Boiler #2. Permit Condition 4.25.
60.7(b)	Startup, shutdown, malfunction records	Applies; see Permit Condition 4.22.
60.7(c-e)	CMS recordkeeping	Does not apply because CMS provision of Subpart Dc do not apply to Boiler #2.
60.7(f)	Recordkeeping	Applies; see Permit Condition 4.23.
60.7(g)	Similar notification	Does not apply because no other states or Tribes require notification.
60.7(h)	Individual subpart clarification	Applies, but is not included in the permit.
60.8	Performance tests	Applies because Subpart Dc requires testing for Boiler #2. See Permit Condition 4.26.
60.9 – 60.10	Availability of information and state authority	Apply, but are not included in the permit.
60.11(a-c)	Compliance with standards including opacity	Applies because the standards in Subpart Dc apply to Boiler #2. See Permit Condition 4.18.
60.11(d)	Good air pollution control practice	Applies; see Permit Condition 4.19.
60.11(e)	Opacity compliance	Applies because opacity requirements in Subpart Dc apply to Boiler #2. See Permit Condition 4.26.
60.11(f)	Conflicting subpart provisions	Applies, but is not included in the permit.
60.11(g)	Credible evidence	Applies; see Permit Condition 4.20.
60.12	Circumvention	Applies; see Permit Condition 4.21.

Citation	Description	Applicability
60.13	Monitoring	Does not apply because Subpart Dc does not require continuous monitoring for Boiler #2.
60.14 – 60.17	Modification, reconstruction, priority list and incorporations by reference	Apply, but are not included in the permit.
60.18	Control devices	Does not apply because Subpart Dc does not refer to this.
60.19	General notification and reporting	Applies; see Permit Condition 4.27.

National Emission Standards for Hazardous Air Pollutants – Part 63. The Neucor facility is considered a minor source of HAPs because the facility has the potential to emit less than 10 tons per year of all HAPs.

The new source review (NSR) permit for this facility creates synthetic minor limits for HAPs, such that the facility can be considered as a minor source of HAPs for any MACT standard. 40 CFR part 63, subpart JJJJJJ, NESHAP for Industrial, Commercial, and Institutional Boilers, is an area source NESHAP that applies to all three boilers at the Neucor facility. In some cases, different requirements in subpart JJJJJJ apply to each boiler as they operate on different fuels. Boiler #1 is categorized as a biomass-fired boiler, Boiler #2 is an oil-fired boiler, and Boiler #3 is also an oil-fired boiler. This NESHAP establishes tune-up and energy assessment requirements but does not include emission limits that impact PTE estimations.

Table 4-4 – NESHAP Subpart JJJJJJ Applicability, 40 CFR Part 63

Citation	Description	Applicability
63.11193 – 63.11196	Purpose, applicability and affected source	Applies, but is not included in the permit.
63.11200	Subcategories of boilers	Applies, but is not included in the permit.
63.11201(a)	Standards – emission limits	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11201(b)	Standards – Table 2	Applies, Permit Conditions 5.11, 6.18, and 7.7
63.11201(c)	Standards – Table 3	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11201(d)	Standards – Exceptions	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11205(a)	General requirements for complying	Applies, Permit Conditions 5.12, 6.19, and 7.8
63.11205(b-c)	General requirements for complying with emission limits	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11210(a-b)	Initial compliance with emission limit	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.

Citation	Description	Applicability
63.11210(c)	Initial compliance for existing affected boilers	Applies, Permit Conditions 5.13, 6.20, and 7.9.
63.11210(d-i)	Initial compliance for new or reconstructed boilers or which make a fuel change	Does not apply, boilers are not new or reconstructed and they have not changed fuel.
63.11210(j)(1)	Boilers at existing major source of HAP that limit potential to emit	Does not apply, Neucor is not an existing major source of HAP.
63.11210(j)(2-3)	Boilers at existing major source of HAP that limit potential to emit – new or reconstructed boiler and notification	Does not apply, boilers at Neucor are existing.
63.11210(k)(1)	Existing affected boilers initial compliance date – emissions limits	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11210(k)(2-3)	Existing affected boilers initial compliance date – initial performance tune-up and energy assessment	Applies, Permit Condition 5.14, 6.21, and 7.10
63.11211	How to demonstrate initial compliance with emission limits	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11212	Stack tests and procedures for performance tests	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11213	Fuel analyses and procedures for performance tests	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11214(a)	Initial compliance with work practice standard, emission reduction measures, and management practice – new or existing coal-fired boiler	Does not apply, boilers at Neucor are wood or oil-fired.
63.11214(b)	Initial compliance with work practice standard, emission reduction measures, and management practice – existing or new biomass-fired boiler or existing or new oil-fired boiler	Applies to all boilers at Neucor as they are all existing biomass-fired or oil-fired boilers. Permit Conditions 5.15, 6.22, and 7.11.
63.11214(c)	Initial compliance with work practice standard, emission reduction measures, and management practice – existing boiler with heat input capacity of 10 MMBtu or greater	Applies as Boiler #1 and Boiler #2 at Neucor have heat input capacity of greater than 10 MMBtu. Permit Conditions 5.16 and 6.23.

Citation	Description	Applicability
63.11214(d)	Initial compliance with work practice standard, emission reduction measures, and management practice – existing or new biomass-fired boiler	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11220(a)	Conducting subsequent performance tests or fuel analyses – boiler with heat input capacity of 10 million Btu per hour or greater	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11220(b-c)	Conducting subsequent performance tests or fuel analyses – new or reconstructed boilers	Does not apply, all boilers at Neucor are existing.
63.11220(d)	Conducting subsequent performance tests or fuel analyses – compliance with mercury emission limit	Does not apply, all boilers at Neucor are not subject to the mercury emission limits in Table 1
63.11220(e)	Conducting subsequent performance tests or fuel analyses – re-start of affected boiler	Does not apply, no emission limits in Table 1 are applicable to the boilers at Neucor.
63.11221	Minimum monitoring data	Does not apply, monitoring is not required at Neucor via this subpart
63.11222	Demonstration of continuous compliance with emission limits	Does not apply, there are no emission or operating limits in Tables 1 and 3 of this subpart that apply to the boilers at Neucor.
63.11223(a-b)	Demonstrating continuous compliance with work practice and management practice standard	Applies, boilers at Neucor are subject to the work practice and management practice standards. Permit Conditions 5.17, 6.24, and 7.12.
63.11223(c)	Demonstrating continuous compliance with work practice and management practice standard - boilers with oxygen trim system	Does not apply
63.11223(d)	Demonstrating continuous compliance with work practice and management practice standard – seasonal boiler	Does not apply
63.11223(e)	Demonstrating continuous compliance with work practice and management practice standard – oil-fired boilers with heat input capacity equal to or less than 5 MMBtu/hr	Does not apply

Citation	Description	Applicability
63.11223(f)	Demonstrating continuous compliance with work practice and management practice standard – limited-use boilers	Does not apply
63.11223(g)	Demonstrating continuous compliance with work practice and management practice standard – Boilers subject to emission limits in Table 1	Does not apply
63.11224	Monitoring, installation, operation, and maintenance requirements	Does not apply
63.11225	Notification, reporting, and recordkeeping requirements	Applies. Permit Conditions 5.18, 6.25, and 7.13.

40 CFR part 63, subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines, is a major or area source NESHAP that applies to the fire pump engine at the Neucor facility. Although the engine is used for emergency purposes, the exemptions to the subpart under 40 CFR 63.6585(f) do not apply because the engine is not a residential, commercial, or institutional reciprocating internal combustion engine (RICE). This NESHAP establishes work, operation, and management requirements, as well as fuel requirements, but does not include emission limits that impact PTE estimations.

Table 4-5 – NESHAP Subpart ZZZZ Applicability, 40 CFR Part 63

Citation	Description	Applicability
63.6580 – 63.6590	Purpose, applicability, affected source	Applies, but is not included in the permit.
63.6595(a-b)	Compliance dates	Does not apply
63.6595(c)	If you own or operate an affected source, you must meet the applicable notification requirements in § 63.6645 and in 40 CFR part 63, subpart A.	Applies, not included in the permit as the cited conditions are already included.
63.6600	Emission limitations and operating limitations for a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.	Does not apply
63.6601	Emissions limitations for a new or reconstructed 4SLB stationary RICE with a site rating of greater than or	Does not apply

Citation	Description	Applicability
	equal to 250 brake HP and less than or equal to 500 brake HP located at a major source of HAP emissions.	
63.6602	Emissions limitations and other requirements for an existing stationary RICE with a site rating of equal to or less than 400 brake HP located at a major source of HAP emissions.	Does not apply
63.6603(a)	Limits and requirements for an existing stationary RICE located at an area source of HAP emissions.	Applies, Permit Condition 8.6. There are requirements in Table 2d of this subpart that apply but there are no emission limits in Table 2b that apply to the engine at Neucor.
63.6603(b-e)	Limits and requirements for existing stationary non-emergency CI RICE with a site rating of more than 300 HP located at and area source of HAP.	Does not apply
63.6603(f)	Limits and requirements for existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP.	Does not apply
63.6604(a)	Fuel requirements for existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP.	Does not apply
63.6604(b)	Fuel requirements for existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel.	Applies, Permit Condition 8.7.
63.6604(d)	Existing CI stationary RICE located in Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, at area sources in areas of Alaska, or are on offshore vessels.	Does not apply
63.6605	General requirements for complying	Applies, Permit Conditions 8.8 and 8.9.

Citation	Description	Applicability
63.6610	Initial performance test or compliance demonstration for stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.	Does not apply
63.6611	Compliance date for initial performance tests or compliance demonstrations for a new or reconstructed 4SLB SI stationary RICE with a site rating of greater to or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions.	Does not apply
63.6612(a)	Compliance date for initial performance test or compliance demonstration for existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions.	Does not apply, no initial performance test or compliance demonstrations in Tables 4 or 5 apply to the engine at Neucor.
63.6612(b)	Exception to initial performance test	Does not apply, an initial performance test is not required for the Neucor engine.
63.6615	Subsequent performance tests	Does not apply, the engine at Neucor does not need to comply with the emission and operating limitations.
63.6620(a)	Performance test procedures – Table 3 and 4	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6620(b-e)	Performance test requirements	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6620(f)	Emission limitation to reduce CO	Does not apply, the Neucor engine is not subject to emission limitations in this subpart.
63.6620(g)	Petition for operating limitation	Does not apply, the Neucor engine is not subject to emission limitations in this subpart.

Citation	Description	Applicability
63.6620(h)	Petition for no operating limitation	Does not apply, the Neucor engine is not subject to emission limitations in this subpart.
63.6620(i)	Engine percent load during performance test	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6620(j)	Reporting results of performance test.	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6625(a-b)	Continuous monitoring requirements	Does not apply, the Neucor engine is not subject to the requirements in Table 5.
63.6625(c-d)	Monitoring and recording for new or reconstructed RICE.	Does not apply
63.6625(e)	Operation and maintenance of stationary RICE and after-treatment control device (if any) according to manufacturer's emission-related written instructions or develop maintenance plan which provides for the maintenance and operation of the engine in a manner consistent with good air pollution control practice.	Applies, Permit Condition 8.10.
63.6625(f)	Installation of non-resettable hour meter	Applies, Permit Condition 8.11.
63.6625(g)	Crankcase installation requirements	Not applicable
63.6625(h)	Requirements to minimize idle time during startup and minimize startup time	Applicable, Permit Condition 8.12.
63.6625(i)	Work, operation, and management practices for CI engines	Applicable, engine at Neucor is subject to Item 4 in Table 2d which is for emergency stationary CI RICE and black start stationary CI RICE. Permit Condition 8.6.
63.6625(j)	Work, operation, and management practices for SI engines	Not applicable
63.6630(a)	Initial compliance emission limitation – Table 5	Not applicable
63.6630(b)	Initial performance test operating limitation – Table 1b and 2b	Not applicable

Citation	Description	Applicability
63.6630(c)	Submitting Notification of Compliance Status	Not applicable, an initial compliance demonstration is not required for the engine at Neucor.
63.6630(d)	Non-emergency 4SRB stationary RICE complying with the requirement to reduce formaldehyde emissions by 76 percent or more	Not applicable
63.6630(e)	Initial compliance demonstration required for existing non-emergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP	Not applicable
63.6635	Monitoring and collecting data to demonstrate continuous compliance	Not applicable, the engine at Neucor does not need to comply with emission and operating limitations in this subpart.
63.6640(a)	Demonstrating continuous compliance with each emission limitation, operating limitation, and other requirements	Applies, Permit Condition 8.10.
63.6640(b)	Reporting each instance in which did not meet each emission limitation or operating limitation that apply	Not applicable, the engine at Neucor does not need to comply with emission and operating limitations in this subpart.
63.6640(c)	Annual compliance demonstration required for existing non-emergency 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at an area source of HAP that are not remote stationary RICE and that are operated more than 24 hours per calendar year	Not applicable
63.6640(d)	New, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup	Not applicable
63.6640(e)	Report each instance in which did not meet the requirements in Table	Not applicable, the engine a Neucor is an existing emergency stationary RICE and

Citation	Description	Applicability
	8 to this subpart that apply	thus does not need to comply with the requirements in Table 8.
63.6640(f)	Requirements for operating emergency stationary RICE	Applicable, Permit Conditions 8.13.
63.6645(a)	Notifications	Applicable as the engine at Neucor is an existing stationary RICE located at an area source of HAP emissions. Permit Condition 8.14.
63.6645(b-e)	Notifications for engines that are new or reconstructed, have a site rating of more than 500 HP, and/or are located at a major source of HAP emissions.	Not applicable
63.6645(f)	If required to submit an Initial Notification but are otherwise not affected by the requirements of this subpart	Not applicable as the engine at Neucor is subject to work, operation, and management practices in Table 2d.
63.6645(g)	If required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6645(h)	If you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status	Does not apply, the Neucor engine is not required to complete any performance tests.
63.6645(h)(1-2)	Notification of Compliance for initial compliance demonstration required in table 5	Not applicable as the engine at Neucor is not subject to the demonstration requirements in Table 5.
63.6645(i)	Notification for existing non-emergency CI RICE with a site rating of more than 300 HP located at an area source of HAP emissions	Not applicable
63.6650(a-g)	Compliance reporting and monitoring reports	Not applicable, the engine at Neucor is not subject to any of the compliance reporting in Table 7 of this subpart and is not required to continuously monitor per this subpart, nor is it subject to any of the

Citation	Description	Applicability
		emission or operating limits in this subpart.
63.6650(h-i)	If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates for the purpose specified in § 63.6640(f)(4)(ii)	Not applicable, the engine at Neucor does not operate for the purpose specified in § 63.6640(f)(4)(ii).
63.6655(a-c)	Records for engines that must comply with emission and operating limitations	Not applicable, the engine at Neucor is not required to comply with any emission and operating limitations in this subpart.
63.6655(d)	Records required in Table 6	Applicable, the engine at Neucor is subject to the work and management practices under item 9 in Table 6 of this subpart. Permit Condition 8.15.
63.6655(e)	Records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan	Applicable, Permit Condition 8.16.
63.6655(f)	Records of the hours of operation of engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.	Applies, Permit Condition 8.17.
63.6660	Form and retention of records	Applicable, Permit Conditions 8.18 – 8.20.

Because 40 CFR part 63, subpart JJJJJJ applies to the boilers and subpart ZZZZ applies to the fire pump engine, subpart A of part 63 also applies. Requirements that apply but do not create specific requirements for Neucor are also not included in the permit. Table 4-6 and Table 4-7 explain whether specific requirements of subpart A apply to the boilers and the fire pump engine respectively, and where the requirements are located in the permit.

Table 4-6 – NESHAP Subpart A Applicability, 40 CFR Part 63 – Boilers

Citation	Description	Applicability
63.1 – 63.3	Applicability, definitions and abbreviations	Applies, but is not included in the permit.
63.4(a)	Prohibited activities	Applies, but are not included in the permit.
63.4(b)	Circumvention	Applies; see Permit Condition 4.29.
63.5	Preconstruction review	Does not apply to the boilers per Table 8 of Subpart JJJJJJ.
63.6(a)	Compliance applicability	Applies, but are not included in the permit.
63.6(b)	Compliance dates for new sources	Does not apply because Neucor's boilers are existing.
63.6(c)	Compliance dates for existing sources	Applies, but is not included in the permit.
63.6(e), (f)(1), (h)(1)	Compliance and operation and maintenance	Do not apply according to Table 8 in Subpart JJJJJJ.
63.6(f)(2-3)	Methods for finding of compliance	Does not apply because there are no non-opacity emissions standards established for the Neucor boilers by Subpart JJJJJJ.
63.6(g)	Alternative emission standards	Does not apply because emission standards are not established for the Neucor boilers by Subpart JJJJJJ.
63.6(h)(2-9)	Compliance with opacity	Does not apply because no opacity limits are established for the Neucor boilers under Subpart JJJJJJ.
63.6(i)	Extension of compliance with emission standards	Does not apply because the Neucor boilers are not subject to emission standards under Subpart JJJJJJ.
63.6(j)	Presidential exemption	Only applies if requested.
63.7	Testing requirements	Does not apply because the boilers at Neucor are not required to undergo a performance test as they are not subject to any emission standards in Subpart JJJJJJ.
63.8	Monitoring requirements	Does not apply because the boilers at Neucor are not subject to monitoring under Subpart JJJJJJ.
63.9(a)	Notification applicability	Applies, but is not included in the permit.
63.9(b)(1)	Initial notifications	Applies but no specific requirements.
63.9(b)(2)	Initial notifications	Applies but no specific requirements.
63.9(b)(4-5)	New source notifications	Do not apply because Neucors's boilers are existing sources.

Citation	Description	Applicability
63.9(c)	Extension of compliance	Does not apply because the Neucor boilers are not subject to the emission standards in Subpart JJJJJJ.
63.9(d)	Notifications for 63.6(b)	Does not apply because Neucors's boilers are existing.
63.9(e)	Performance Test notification	Does not apply because the boilers at Neucor do not require a performance test.
63.9(f)	Opacity notifications	Does not apply because Neucor's boilers are not subject to any opacity limits under Subpart JJJJJJ.
63.9(g)	CMS notifications	Does not apply because the Neucor boilers are not subject to CMS requirements under Subpart JJJJJJ.
63.9(h)(1)	Notification of compliance status	Applies, but is not included in the permit.
63.9(h)(2-3)	Notification of compliance status	Applies; see Permit Condition 4.33.
63.9(h)(5)	Actual emission data	Does not apply because the Neucor boilers were not subject to 63.5.
63.9(h)(6)	Advice from the administrator	Ony applies if requested.
63.9(i)	Adjustments to time periods	Applies, but is not included in the permit.
63.9(j)	Changes to provided information	Applies; see Permit Condition 4.34.
63.10(a)	Applicability	Applies, but is not included in the permit.
63.10(b)(1)	General recordkeeping files	Applies; see Permit Condition 4.31.
63.10(b)(2)(i, iv-xiii)	General recordkeeping files	Do not apply because Neucor's boilers are not subject to emission limits or monitoring.
63.10(b)(2)(ii)	Malfunction of process equipment records	Applies; see Permit Condition 4.30.
63.10(b)(2)(iii)	Maintenance on air pollution control equipment records	Does not apply as no air pollution equipment is required for the Neucor boilers per Subpart JJJJJJ.
63.10(b)(2)(xiv)	Documentation supporting initial notifications and notifications of compliance status	Applies; see Permit Condition 4.32.
63.10(b)(3)	Applicability determination records	Does not apply as Neucor has not made an applicability determination.
63.10(c)	CMS recordkeeping	Does not apply because the Neucor boilers are not subject to CMS requirements per Subpart JJJJJJ.
63.10(d)(1)	General reporting	Applies, but no specific condition created.
63.10(d)(2-3)	Test and opacity reporting	Does not apply because the Neucor boilers are not subject to performance testing per Subpart JJJJJJ and 63.10(d)(3)

Citation	Description	Applicability
		is not applicable per Table 8 of Subpart JJJJJJ.
63.10(d)(4)	Compliance extension progress reporting	Does not apply because the Neucor boilers are not subject to a compliance extension.
63.10(d)(5)	Periodic and immediate reporting	Do not apply according to Table 8 in Subpart JJJJJJ.
63.10(e)	Reports for CMS	Does not apply because the Neucor boilers are not subject to CMS requirements per Subpart JJJJJJ.
63.10(f)	Reporting Waivers	Does not apply as Neucor has not requested a waiver.
63.11	Control device requirements	Do not apply according to Table 8 in Subpart JJJJJJ.
63.12	State authority and delegation	Does not apply to Neucor.
63.13	Addresses	Applies, but current EPA address is included in Permit Condition 3.40.
63.14	Incorporations by reference	Applies, but does not create a specific requirement.
63.15	Availability of information	Applies, but does not create a specific requirement.
63.16	Performance track provisions	Does not apply as Neucor is not a performance track facility.

Table 4-7 – NESHAP Subpart A Applicability, 40 CFR Part 63 – Fire Pump Engine

Citation	Description	Applicability
63.1 – 63.3	Applicability, definitions and abbreviations	Applies, but is not included in the permit.
63.4(a)	Prohibited activities	Applies, but are not included in the permit.
63.4(b)	Circumvention	Applies; see Permit Condition 4.29.
63.5	Preconstruction review	Does not apply to the engine at Neucor as it is not new or reconstructed.
63.6(a)	Compliance applicability	Applies, but are not included in the permit.
63.6(b)	Compliance dates for new sources	Does not apply because Neucors's engine is existing.
63.6(c)	Compliance dates for existing sources	Applies, but is not included in the permit.
63.6(e), (f)(1), (h)	Compliance and operation and maintenance	Do not apply according to Table 8 in Subpart ZZZZ.

Citation	Description	Applicability
63.6(f)(2-3)	Methods for finding of compliance	Applies, but are not included in the permit.
63.6(g)	Alternative emission standards	Does not apply because emission standards are not established for the Neucor engine by Subpart ZZZZ.
63.6(i)	Extension of compliance with emission standards	Does not apply because the Neucor engine is not subject to emission standards under Subpart ZZZZ.
63.6(j)	Presidential exemption	Applies only if requested.
63.7	Testing requirements	Does not apply, the engine at Neucor is not required to undergo an initial performance test per Subpart ZZZZ.
63.8	Monitoring requirements	Does not apply because the engine at Neucor is not subject to monitoring under Subpart ZZZZ.
63.9(a)	Notification applicability	Applies, but is not included in the permit.
63.9(b)(1)	Initial notifications	Applies, but does not create a specific requirement.
63.9(b)(2)	Initial notifications	Applies, but does not create a specific requirement.
63.9(b)(4-5)	New source notifications	Do not apply because Neucors's engine is an existing sources.
63.9(c)	Extension of compliance	Does not apply because the Neucor engine is not subject to the emission standards in Subpart ZZZZ.
63.9(d)	Notifications for 63.6(b)	Does not apply because Neucors's engine is existing.
63.9(e)	Performance Test notification	Does not apply because the engine at Neucor does not require a performance test.
63.9(f)	Opacity notifications	Does not apply because Subpart ZZZZ does not contain opacity standards.
63.9(g)	CMS notifications	Does not apply because the Neucor engine is not subject to CMS requirements under Subpart ZZZZ.
63.9(h)(1)	Notification of compliance status	Applies, but is not included in the permit.
63.9(h)(2-3)	Notification of compliance status	Applies; see Permit Condition 4.33.
63.9(h)(5)	Actual emission data	Does not apply because the Neucor engine is not subject to 63.5.
63.9(h)(6)	Advice from the administrator	Does not apply as this has not been requested.
63.9(i)	Adjustments to time periods	Applies, but is not included in the permit.
63.9(j)	Changes to provided information	Applies; see Permit Condition 4.34.
63.10(a)	Applicability	Applies, but is not included in the permit.
63.10(b)(1)	General recordkeeping files	Applies; see Permit Condition 4.31.

Citation	Description	Applicability
63.10(b)(2)(i, iii-xiii)	General recordkeeping files	Do not apply because Neucor's engine is not subject to emission limits, nor monitoring and has no controls.
63.10(b)(2)(ii)	Malfunction of process equipment records	Applies; see Permit Condition 4.30.
63.10(b)(2)(xiv)	Documentation supporting initial notifications and notifications of compliance status	Applies; see Permit Condition 4.32.
63.10(b)(3)	Applicability determination records	Applies, but is not included in the permit.
63.10(c)	CMS recordkeeping	Does not apply because the Neucor engine is not subject to CMS requirements per Subpart ZZZZ.
63.10(d)(1)	General reporting	Applies, but is not included in the permit.
63.10(d)(2-3)	Test and opacity reporting	Does not apply because the Neucor engine is not subject to performance testing per Subpart ZZZZ and 63.10(d)(3) is not applicable per Table 8 of Subpart ZZZZ.
63.10(d)(4)	Compliance extension progress reporting	Does not apply because the Neucor engine is not subject to a compliance extension.
63.10(d)(5)	Periodic and immediate reporting	Do not apply according to Table 8 in Subpart ZZZZ.
63.10(e)	Reports for CMS	Does not apply because the Neucor engine is not subject to CMS requirements per Subpart ZZZZ.
63.10(f)	Reporting Waivers	Applies, but is not included in the permit.
63.11	Control device requirements	Do not apply according to Table 8 in Subpart ZZZZ.
63.12	State authority and delegation	Applies, but is not included in the permit.
63.13	Addresses	Applies, but current EPA address is included in Permit Condition 3.40.
63.14	Incorporations by reference	Applies, but is not included in the permit.
63.15	Availability of information	Applies, but is not included in the permit.
63.16	Performance track provisions	Applies, but is not included in the permit.

Section 111(d) and Section 129 Regulations. There are no CAA, section 111(d) or 129 regulations that apply to the type of emission units at Neucor.

Federal Air Rules for Reservations. On April 8, 2005, the EPA promulgated a Federal Implementation Plan for Reservations in Idaho, Oregon and Washington, commonly referred to as the Federal Air Rules for Reservations. The EPA published the FARR rules that generally apply to Indian Reservations in Region 10 in 40 CFR 49.121 to 49.139. The FARR rules that specifically apply on the Yakama Reservation (Sections 123, 124, 125, 126, 129, 130, 131, 135, 137, 138 and 139) are codified at 40 CFR 49.11101 to 49.11110. FARR requirements that do not apply to the Neucor facility are not included in the permit;

requirements that apply but do not create specific requirements for Neucor are also not included in the permit. Table 4-8 explains whether specific requirements of the FARR apply to the Neucor facility and, if included, where the requirements are located in the permit.

Table 4-8 – FARR Applicability, 40 CFR Part 49

Citation	Description	Applicability
49.121 – 49.122	Introduction and delegation	Apply, but are not included in the permit.
49.123(a-c)	Definitions, testing, monitoring, recordkeeping, reporting, and credible evidence and incorporation by reference	Apply, but are not included in the permit.
49.124(a-b, f)	Visible emission limits purpose, applicability and definitions	Apply, but are not included in the permit.
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.
49.124(d)(3)	Visible emission limit for oil and solid fuel	Does not apply because Neucor does not use a COMS to comply with the opacity limits for the boilers.
49.124(e)	Reference method	Applies; see Permit Condition 3.9.
49.125(a-c, f)	PM limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.125(d)(1, 3)	PM limits	Applies; see Permit Conditions 6.6, 7.6, 8.5, 9.7, 10.2, 13.2, 14.2, and 15.3.
49.125(d)(2)	PM limit for wood fuel	Applies because Boiler #1 operates on wood fuel; see Permit Condition 5.10.
49.125(e)	Reference method	Applies; see Permit Conditions 6.6, 7.6, 8.5, 9.7, 10.2, 13.2, 14.2, and 15.3.
49.126(a-b, f)	Fugitive PM limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.126(c)	Exemptions	Applies; see Permit Condition 3.17.
49.126(d-e)	Fugitive PM	Apply; see Permit Conditions 3.12-3.16 and 3.35.
49.127	Rule for woodwaste burners	Does not apply.
49.128	Rule for limiting particulate matter emissions from wood products industry sources	Does not apply.
49.129(a-c, f)	SO_2 limits purpose, applicability and definitions	Apply, but are not included in the permit.
49.129(d)(1)	SO_2 limit for combustion sources	Applies; see Permit Conditions 5.9, 6.5, 7.5, and 8.4.
49.129(d)(2)	SO_2 limit for process sources	Does not apply because none of Neucor's processes emit SO_2 and the combustion sources are already covered under 49.129(d)(1).

Citation	Description	Applicability
49.129(e)	Reference method	Applies; see Permit Conditions 5.9, 6.5, 7.5, and 8.4.
49.130(a-c, g)	Fuel sulfur limit purpose, applicability and definitions	Apply, but are not included in the permit.
49.130(d)(1-8)	Fuel sulfur limits for liquid, solid fuels, and gaseous fuels	Applies for all boilers and the fire pump engine. Permit Condition 4.2, 4.3, and 4.4.
49.130(e)(1-3)	Reference methods for liquid and solid fuels	Applies; see Permit Conditions 4.2 and 4.3.
49.130(e)(4)	Reference method for gaseous fuels	Applies to Boiler #2; see Permit Condition 4.4.
49.130(f)(1)(i-iii), (f)(2)	Recordkeeping for liquid, gaseous, and solid fuels	Applies; see Permit Conditions 4.5-4.8.
49.130(f)(3)	Recordkeeping exemption for residences	Does not apply because Neucor is not a residence.
49.131(a, b, f)	Open burning purpose and applicability	Apply, but are not included in the permit.
49.131(c, d, e)	Open burning	Apply; see Permit Conditions 3.4-3.8.
49.135	Detrimental emissions	Applies, but are not included in the permit.
49.137(a, b, d)	Air pollution episode purpose, applicability and definitions	Apply, but are not included in the permit.
49.137(c)(1-3)	Air pollution episodes	Apply, but are not included in the permit.
49.137(c)(4)(i-ii)	Air pollution episodes	Apply; see Permit Conditions 3.6 and 3.7.
49.137(c)(4)(iii)	Air pollution episodes	Apply, but are not included in the permit.
49.138(a-c, g)	Registration purpose, applicability and definitions	Apply, but are not included in the permit.
49.138(d)	Registration and reporting for Part 71 sources	Apply; see Permit Condition 3.46.2.
49.138(f)	Registration and reporting for Part 71 sources	Apply; see Permit Condition 3.46.
49.138(e)(1-2, 5-8)	Reporting for non-Part 71 sources	Do not apply because Neucor is a Part 71 source.
49.138(e)(3)(i-xi, xiii-xiv)	Reporting for non-Part 71 sources	Do not apply because Neucor is a Part 71 source.
49.138(e)(3)(xii)	Reporting for Part 71 sources	Apply; see Permit Condition 3.46.
49.138(e)(4)	Reporting for Part 71 sources	Apply; see Permit Conditions 3.46 and 3.46.1.
49.139	Non-Title V operating permits	Applies, but is not included in the permit.

Acid Rain Program. Title IV of the CAA created a SO_2 and NO_X reduction program found in 40 CFR part 72. The program applies to any facility that includes one or more "affected units" that produce power. Neucor's boilers are not a "unit" as defined in 40 CFR 72.2 because the boilers do not produce power.

Compliance Assurance Monitoring. CAM applies at the time of initial title V permit issuance for emission units that (a) are subject to an emission limit, (b) employ a control device to comply with the limit, and

(c) have post-control PTE equal to or greater than the major source threshold defined in title V (generally, 100 tons per year). See 40 CFR part 64. There are baghouses employed to control particulate matter generated by many of the facility processes, along with an electrostatic precipitator to control particulate matter from Boiler #1. These control devices allow the facility to comply with the emissions limits set. CAM potentially applies to these units at the Neucor facility. Applicability will be considered at the time of permit renewal.

Chemical Accident Release Program. The facility has not reported storing a regulated substance above the threshold quantity. The permit contains a placeholder provision requiring the permittee to comply with the chemical accident prevention provisions in 40 CFR part 68 in a timely manner if it becomes subject.

Protection of Stratospheric Ozone. The provisions of 40 CFR part 82, subparts B and F apply to facilities that handle ozone depleting substances (e.g., refrigerants). The permit contains conditions that require the permittee to manage ozone depleting substances and maintain records according to these subparts.

3.2 Other Federal Requirements

EPA Trust Responsibility. As part of the EPA Region 10's direct federal implementation and oversight responsibilities, Region 10 has a trust responsibility to each of the 271 federally recognized Indian tribes within the Pacific Northwest and Alaska. The trust responsibility stems from various legal authorities including the U.S. Constitution, Treaties, statutes, executive orders, historical relations with Indian tribes and, in this case, the Treaty of June 9, 1855. In general terms, the EPA is charged with considering the interest of tribes in planning and decision making processes. Each office within the EPA is mandated to establish procedures for regular and meaningful consultation and collaboration with Indian tribal governments in the development of EPA decisions that have tribal implications. Region 10's Air and Radiation Division has contacted the Tribe to invite consultation on this title V operating permit project.

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

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

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

4. Permit Conditions

4.1 Permit Conditions for Initial Issuance of Permit No. R10-T5-04-00-00

This title V operating permit compiles all the applicable requirements that apply to the permittee. Additional monitoring, recordkeeping and reporting requirements have been created where needed so the permit assures compliance with all the applicable requirements. In general, each permit condition in the permit is explained below. Certain permit conditions are self-explanatory and thus are not further discussed. The permit is organized into the following nine sections:

Permit Section 1: Source Information and Emission Units
Permit Section 2: Standard Terms and Conditions
Permit Section 3: General Requirements
Permit Section 4: Facility-Specific Requirements
Permit Section 5: Unit-Specific Requirements – Boiler #1
Permit Section 6: Unit-Specific Requirements – Boiler #2
Permit Section 7: Unit-Specific Requirements – Boiler #3
Permit Section 8: Unit-Specific Requirements – Fire Pump Engine
Permit Section 9: Unit-Specific Requirements – Dryers
Permit Section 10: Unit-Specific Requirements – Blenders/Formers
Permit Section 11: Unit-Specific Requirements – Presses
Permit Section 12: Unit-Specific Requirements – Board Coolers
Permit Section 13: Unit-Specific Requirements – Material Handling and Sawing
Permit Section 14: Unit-Specific Requirements – Material recycling and Sanding
Permit Section 15: Unit-Specific Requirements – Miscellaneous Non-Fugitive Activities

Permit Section 1 – Source Information and Emission Units

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

Permit Section 2 – Standard Terms and Conditions

This permit section includes generic compliance terms that are required in all title V permits, but that Region 10 does not expect to be addressed in the annual compliance certification required in Permit Condition 3.49.

Permit Condition 2.1 explains that the language in the underlying regulations takes precedence over paraphrased language in the permit. Some applicable requirements are paraphrased in the permit with the intention of clarifying the requirement, but with no intention of changing the underlying meaning of the requirement. Where there is a difference between the language in a permit and an underlying regulation, the wording in the underlying regulation governs. This permit condition also notes some underlying authorities that may have been used to create additional requirements in this permit. For instance, Region 10 is relying upon periodic monitoring authority in 40 CFR 71.6(a)(3)(i)(B) to create monitoring requirements when an applicable underlying emission limitation is not accompanied by monitoring. Region 10 is relying upon sufficiency monitoring authority in 40 CFR 71.6(c)(1) to create monitoring requirements when an applicable underlying emission limitation is accompanied by monitoring that we have determined is not sufficient to assure compliance with the limitation.[1]

[1] In the Matter of Citgo Refining and Chemicals Company L.P., West Plant, Corpus Christi, Texas, Order on Petition No. VI-2007-01 (May 28, 2009). Permitting authorities must incorporate applicable monitoring requirements into the Title V permit, add monitoring when no underlying monitoring exists, and supplement existing monitoring that is not sufficient to assure compliance with permit terms and conditions.

Permit Conditions 2.4 and 2.5 address a general permit shield which states that compliance with the permit is deemed compliance with the applicable requirements listed in the permit. The permittee is responsible for complying with any applicable requirements that exist but have not been included in the permit. The permittee did not request a permit shield for any requirement excluded from this permit, and none is being granted.

Permit Condition 2.6 incorporates the credible evidence rule as reflected in the various applicable requirements cited as authority for this condition. It makes clear that language in the permit stating "compliance is determined with" or "demonstrate compliance by" does not preclude the use of other credible evidence to demonstrate that the permittee is not in compliance with an applicable requirement.

Permit Conditions 2.7 and 2.8 incorporate the part 71 provisions regarding permit modification, revocation, reopening, reissuance, and termination for cause.

Permit Conditions 2.9 through 2.11 address the expiration of the permit and the ramifications if the permittee does or does not renew their permit. It is important to note that, if the permittee does not submit a complete and timely renewal application, the permittee's right to operate is terminated. The expiration date of the permit is listed on the top right-hand corner of the front page of the permit. Specific requirements regarding permit renewal are in Permit Conditions 3.51 and 3.52.

Permit Conditions 2.12 through 2.14 address options for making certain physical and operational changes in the facility that do not require a permit modification. If the permittee uses any of these options, they must comply with the applicable recordkeeping requirement found in Permit Condition 3.32 and reporting requirements found in Permit Conditions 3.38 and 3.39.

Permit Section 3 – General Requirements

This permit section includes conditions that are required in all title V permits. In some cases, facility-specific testing, monitoring, recordkeeping and reporting requirements for these permit conditions are found in Section 4 of the permit because those requirements can vary from permit to permit. Unless otherwise specified, emission units are subject to the general requirements in Section 3 of the permit as well as the facility-specific and unit-specific requirements in Sections 4 through 15.

Permit Conditions 3.1 and 3.2 are general compliance schedule requirements. Because the EPA is not aware of any non-compliance at the time of permit issuance, there is no issue-specific compliance schedule in the permit.

Permit Condition 3.3 requires the permittee to allow EPA-authorized representatives access to the facility and required records.

Permit Conditions 3.4 through 3.8 restrict open burning. If the permittee performs any open burning, recordkeeping requirements specific to open burning found in Permit Condition 3.33 will apply.

Permit Conditions 3.9 through 3.11 limit visible emissions, requiring the use of Reference Method 9 and provide exceptions to the rule. COMS can be used to determine compliance with the limit but it is assumed that Neucor will use Reference Method 9 to comply. Reference Method 9 includes specific guidance for reading opacity when there is a wet plume (both attached and detached and directs the observer to take readings excluding the portion of the plume that includes uncombined water (droplets). The likelihood of exceeding the 20% opacity limit due to the presence of uncombined water is usually low because a certified reader would know not to read that portion of the plume. However, there are meteorological conditions that can prevent uncombined water (droplets) from completely

evaporating in a plume (e.g., 100% relative humidity and a saturated plume). The provision in Permit Condition 3.11 addresses that situation.

Because testing, monitoring, recordkeeping and reporting for assuring compliance with the visible emission limit can change based on the emission unit in question, the testing, monitoring, recordkeeping and reporting requirements are contained in facility-specific requirements in Section 4 of the permit, or in each emission unit-specific section, as appropriate. The general monitoring, recordkeeping and reporting for this requirement is the periodic visible emissions survey (plant walkthrough) specified in Permit Conditions 4.9 through 4.15.

Permit Conditions 3.12 through 3.17 require the permittee to create a plan to take precautions to prevent fugitive emissions. The plan shall be based on a survey of the facility and be updated annually. The permittee can comply with this annual survey simultaneously with the periodic visible emission survey requirement in Permit Conditions 4.9 through 4.15.

Permit Condition 3.18 addresses requirements in the Chemical Accident Prevention Program found in 40 CFR part 68. This program requires sources that use or store regulated substances above a certain threshold to develop plans to prevent accidental releases. This requirement is included in the permit as an applicable requirement because the permittee has an ongoing responsibility to submit a risk management plan if a substance is listed that the facility has in quantities over the threshold amount, or if the facility ever increases the amount of any regulated substance above the threshold quantity. Including this term in the permit minimizes the need to reopen the permit if the facility becomes subject to the requirement to submit a risk management plan.

Permit Conditions 3.19 and 3.20 address the Stratospheric Ozone and Climate Protection Program found in 40 CFR part 82. This program requires sources that handle regulated materials to meet certain procedural and certification requirements. There may be equipment at the facility that uses or contains chlorofluorocarbons (CFCs) or other materials regulated under this program. All air conditioning and refrigeration units must be maintained by certified individuals if they contain regulated materials.

Permit Condition 3.21 addresses asbestos demolition or renovation activity found in 40 CFR part 61, Subpart M (NESHAP). This program requires sources that handle asbestos-containing materials to follow specific procedures. If the permittee conducts any demolition or renovation activity at their facility, they must assure that the project is in compliance with the federal rules governing asbestos, including the requirement to conduct an inspection for the presence of asbestos. This requirement is in the permit to address any demolition or renovation activity that may occur at the facility.

Permit Conditions 3.22 through 3.30 specify the procedures that must be followed whenever the permit requires emissions testing or sampling in an emission unit-specific section of the permit. If there is a conflict between these permit conditions and an emission unit-specific permit condition, the unit-specific permit condition governs. Concentration-based emission limits required to be corrected to a specific oxygen concentration in the flue gas often do not contain a protocol to convert measured concentrations to specified oxygen levels. Permit Condition 3.28 provides a protocol for such a conversion.

Permit Condition 3.31 describes general recordkeeping that has been added to the permit using part 71 authority to assure that there is good documentation for any monitoring that the permittee performs.

Permit Condition 3.32 describes recordkeeping requirements that apply only if the permittee makes off-permit changes. Certain off-permit changes are allowed in Permit Condition 2.12.

Permit Condition 3.33 describes recordkeeping requirements that apply if the permittee performs open

burning. The open burning recordkeeping was added using part 71 authority. Open burning is restricted in Permit Conditions 3.4 through 3.8.

Permit Condition 3.34 includes recordkeeping that applies to fee records including the duration that the records must be maintained. The duration is consistent with that required by title V (see Permit Condition 3.35).

Permit Condition 3.35 sets the duration that records must be maintained. Both title V and FARR records must be maintained for five years. These two requirements have been combined (streamlined) into one permit condition. If there is ever a conflict between these requirements and a more restrictive emission unit-specific permit condition, the unit-specific permit condition governs.

Permit Conditions 3.36 and 3.37 require the permittee to submit or correct submitted information when requested by EPA and as needed. The permittee has an ongoing obligation to assure that all data in its title V application is correct and to notify EPA of any errors or omissions. This includes notifying Region 10 if the application no longer reflects the type of fuel actually being fired in a combustion unit.

Permit Condition 3.38 and 3.39 describe reporting requirements that apply only if the permittee makes off-permit changes (Permit Condition 3.38) or section 502(b)(10) changes (Permit Condition 3.39). Certain off-permit changes are allowed in Permit Condition 2.12. Section 502(b)(10) changes are allowed in Permit Conditions 2.13.

Permit Condition 3.40 specifies that all submittals are to be submitted to EPA electronically via CEDRI unless the submittal contains confidential business information (CBI). Submittals containing CBI must be sent hardcopy to the addresses specified or electronically.

Permit Conditions 3.41 through 3.45 require submittal of an annual emission inventory (of actual emissions) and payment of fees for part 71 purposes. These requirements refer to Permit Condition 4.1 for the actual due date by which fees and emissions must be submitted each year. The per-ton fee rate varies each year; contact EPA to obtain the current rate. The submittal of the emission inventory is timed to coincide with the payment of fees because annual title V fees are based on actual emissions generated during the previous calendar year. Appendix A to this statement of basis documents the methods, techniques, and assumptions that EPA believes provide the most accurate basis for estimating actual emissions for this facility. As explained in Section 3.2 of this statement of basis, Region 10 expects the emission estimation techniques listed in this statement of basis to be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emission are calculated based on actual operations, not maximum operational capacity.

Note that the FARR emission inventory required in Permit Condition 3.46 to be reported at the same time can be combined with the part 71 emission inventory as long as it is clear which emissions inventory is for which purpose, because the pollutant lists for each emission inventory are slightly different.

Permit Condition 3.46 requires submittal of an annual emission inventory (of actual emissions) for FARR registration purposes. Appendix A to this statement of basis documents the methods, techniques, and assumptions that EPA believes provide the most accurate basis for estimating actual emissions for this facility. As explained in Section 3.2 of this statement of basis, Region 10 expects the emission estimation techniques listed in this statement of basis to be used to calculate the annual emissions inventory, unless the permittee has other information showing why another technique more accurately represents

emissions. Also note that the actual emission estimates differ from the facility's PTE because actual emission are calculated based on actual operations, not maximum operational capacity.

Note that the FARR emission inventory is required to be submitted at the same time as the part 71 fees and emission inventory required in Permit Conditions 3.41 through 3.45. The part 71 and FARR emission inventories can be combined as long as it is clear which emissions inventory is for which purpose, because the pollutant lists for each emission inventory are slightly different.

Permit Conditions 3.47 and 3.48 require semi-annual monitoring reports and prompt deviation reports. Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit. Failure to meet any permit term or permit condition, including emission standards, is considered a deviation. Other credible evidence (including any evidence admissible under the federal rules of evidence) must be considered by the source and EPA in such determinations. The timing for reporting deviations, as well as other data collected, depends on the circumstances, as explained in these permit conditions.

Permit Condition 3.49 requires an annual compliance certification. The permittee must certify compliance with the permit conditions in sections 3 through 15. The permittee does not need to annually certify compliance with the provisions in permit sections 1 or 2. Consistent with Permit Condition 2.6, however, if a permittee is aware of any information that indicates noncompliance, that information must be included in the annual compliance certification. In a year when the permit is renewed or revised, the permittee must address each permit for the time that permit was in effect. Forms for the annual compliance certifications may be obtained on the internet at https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.

Permit Condition 3.50 requires the permittee to certify the truth, accuracy and completeness of all documents (notices, reports, data, and etc) submitted to EPA. The certification must be signed by a responsible official as defined in 40 CFR 71.2. The facility's responsible officials are listed on the first page of the permit. The permittee must request an administrative amendment of the permit if the responsible official for the facility changes.

Permit Conditions 3.51 and 3.52 require the permittee to submit an application for renewal and describe some of the information that must be included in the application. As explained in Permit Conditions 2.9 through 2.11, failure to submit a complete application on time terminates the permittee's right to operate. The expiration date of the permit is listed on the top right-hand corner of the front page of the permit.

Permit Section 4 – Facility-Specific Requirements

This permit section includes applicable requirements and related testing, monitoring, recordkeeping and reporting that apply either to multiple emission units or on a facility-specific basis. Unless otherwise specified, emission units are subject to the facility-specific requirements in Section 4 of the permit as well as the general and unit-specific requirements in Sections 3 and 5 through 15 of the permit.

Permit Conditions 4.1 lists the due date for the annual fees and emission reports required in Permit Conditions 3.41 through 3.46.

Permit Conditions 4.2 through 4.8 limit the sulfur content of the fuel oil, wood, and propane fuel burned in any combustion device, specify the method for determining compliance and specify the monitoring and recordkeeping. For fuel oil compliance with the percent sulfur limit of 0.05, the permittee shall obtain certification from the fuel supplier. Although 40 CFR 60.42c(d) allows for a percent sulfur limit of

0.5, the FARR rules cited in this permit condition require 0.05 percent sulfur. The stricter requirement of 0.05 overrides what is stated in 40 CFR 60.42c(d).

Propane may be burned in Boiler #2 as a backup fuel and per the underlying rule, the permittee may also keep vendor records showing that the sulfur content of the propane is below the limit of 1.1 grams/dscm. Per the Gas Processors Association (GPA) Liquefied Petroleum Gas Specifications Standard 2140-97, HD-5 grade propane is limited to 0.147 grams/dscm sulfur (using AP-42 conversion factors: 123 ppmw x 28.8 / 32 = 110.7 ppmv and 110.7 ppmv x 32 / 0.02404×10^6 = 0.147 grams/dscm), so the permittee can satisfy the requirement to have vendor records by simply documenting that only HD-5 propane is burned.

Boiler #1 burns wood which may not have more than 2.0 percent sulfur by weight per the FARR rules cited in Permit Condition 4.3. Per Permit Condition 4.7, the permittee may comply with the requirement to maintain record of sulfur content of the wood by documenting that only wood was used.

Permit Conditions 4.9 through 4.15 require a quarterly survey (also called a plant walkthrough) for visible and fugitive emissions as well as specific follow-up steps (investigation, corrective action, Reference Method 9 observation and additional recordkeeping and reporting) if visible or fugitive emissions are observed. Because equipment lines at Neucor may operate at different times, more than one plant walkthrough may be necessary. Additionally, If observed visible or fugitive emissions cannot be eliminated within 24 hours, a tiered sequence of Reference Method 9 opacity determinations must be performed beginning with an initial 30-minute period of readings every 15 seconds. The frequency (e.g. daily or weekly) for conducting follow-up Reference Method 9 opacity readings is based upon whether any 6-minute average opacity exceeds 20%. Observations of visible or fugitive emissions during a survey are not considered deviations; however, any resulting Reference Method 9 6-minute average opacity determination above 20% is considered a permit deviation pursuant to Permit Conditions 3.47 and 3.48. The annual fugitive particulate matter survey required in Permit Condition 3.13 can be accomplished simultaneously with a quarterly survey required in this permit condition as long as both requirements are fully complied with.

This permit condition serves as the periodic monitoring for several fugitive and particulate matter limits found in the permit. This requirement applies to emission sources that normally do not exhibit visible or fugitive emissions. If the permittee prefers a specific periodic monitoring approach for any emission sources subject to this requirement, the permittee can propose a new approach as a permit modification.

Permit Conditions 4.18 through 4.28 are generally applicable requirements that apply to any emission unit that is or becomes subject to NSPS. Because 40 CFR subpart Dc applies to Neucor's Boiler #2, the generally applicable requirements of NSPS applies to Boiler #2.

Permit Conditions 4.29 through 4.34 are generally applicable requirements that apply to any emission unit that is or becomes subject to NESHAP. Neucor's boilers and fire pump engine are applicable because Neucor's boilers are subject to 40 CFR Subpart JJJJJJ and the fire pump engine is subject to 40 CFR Subpart ZZZZ.

Permit Conditions 4.35 through 4.49 are facility-wide requirements that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Section 5 – Unit-Specific Requirements – Boiler #1

Permit Conditions 5.1 through 5.8 are conditions specific to Boiler #1 that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 5.9 limits the sulfur dioxide emissions from Boiler #1 and describes the emission testing methods for determining compliance. Only wood can be used in Boiler #1 as fuel so SO_2 emissions are expected to be well below the emission limit of 500 ppmdv at 7% O_2 as wood generally does not contain high sulfur content.

Permit Condition 5.10 limits the particulate matter (PM) emissions from Boiler #1 to 0.2 gr/dscf at 7% O_2 and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Conditions 5.11 through 5.18 are the conditions from NESHAP Subpart JJJJJJ that are applicable to Boiler #1.

Permit Section 6 – Unit-Specific Requirements – Boiler #2

Permit Condition 6.1 prohibits any fuel besides ASTM Grade 2 fuel oil from being combusted in the boiler, with the exception of propane as a backup fuel.

Permit Conditions 6.2 through 6.4 are conditions specific to Boiler #2 that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 6.5 limits the sulfur dioxide emissions from Boiler #2 and describes the emission testing methods for determining compliance. For detailed analysis of emission factors and projected SO_2 emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Condition 6.6 limits the particulate matter (PM) emissions from Boiler #2 to 0.1 gr/dscf at 7% O_2 and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Conditions 6.7 through 6.17 are conditions from NSPS Subpart Dc that are applicable to Boiler #2.

Permit Conditions 6.18 through 6.25 are conditions from NESHAP Subpart JJJJJJ that are applicable to Boiler #2.

Permit Section 7 – Unit-Specific Requirements – Boiler #3

Permit Condition 7.1 prohibits any fuel besides ASTM Grade 2 fuel oil from being combusted in the boiler.

Permit Conditions 7.2 through 7.4 are conditions specific to Boiler #3 that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 7.5 limits the sulfur dioxide emissions from Boiler #3 and describes the emission testing methods for determining compliance. For detailed analysis of emission factors and projected SO_2 emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Condition 7.6 limits the particulate matter (PM) emissions from Boiler #3 to 0.1 gr/dscf at 7% O_2 and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Conditions 7.7 through 7.13 are conditions from NESHAP Subpart JJJJJJ that are applicable to Boiler #3.

Permit Section 8 – Unit-Specific Requirements – Fire Pump Engine

Permit Conditions 8.1 and 8.3 are conditions specific to the fire pump engine that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 8.2 prohibits any fuel besides diesel from being combusted in the fire pump engine.

Permit Condition 8.4 limits the sulfur dioxide emissions from the fire pump engine and describes the emission testing methods for determining compliance. For detailed analysis of emission factors and projected SO_2 emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Condition 8.5 limits the particulate matter (PM) emissions from the fire pump engine to 0.1 gr/dscf at 7% O_2 and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Conditions 8.6 through 8.20 are conditions from NESHAP Subpart ZZZZ that are applicable to the fire pump engine.

Permit Section 9 – Unit-Specific Requirements – Dryers

Permit Conditions 9.1 through 9.6 are conditions specific to the dryers that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 9.7 limits the particulate matter (PM) emissions from the dryers to 0.1 gr/dscf and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Section 10 – Unit-Specific Requirements – Blenders/Formers

Permit Condition 10.1 is specific to the blenders/formers and has been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 10.2 limits the particulate matter (PM) emissions from the blenders/formers to 0.1 gr/dscf and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Section 11 – Unit-Specific Requirements – Board Coolers

Permit Condition 11.1 through 11.3 are conditions specific to the board coolers that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Section 12 – Unit-Specific Requirements – Presses

Permit Condition 12.1 is specific to the presses and has been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Section 13 – Unit-Specific Requirements – Material Handling and Sawing

Permit Condition 13.1 is specific to material handling and sawing and has been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 13.2 limits the particulate matter (PM) emissions from material handing and sawing to 0.1 gr/dscf and describes the emission testing method for determining compliance. For detailed analysis

of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Section 14 – Unit-Specific Requirements – Material Recycling and Sanding

Permit Condition 14.1 is specific to material recycling and sanding and has been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 14.2 limits the particulate matter (PM) emissions from material recycling and sanding to 0.1 gr/dscf and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

Permit Section 15 – Unit-Specific Requirements – Miscellaneous Non-Fugitive Activities

Permit Conditions 15.1 and 15.2 are conditions specific to miscellaneous non-fugitive activities that have been carried over from Neucor's minor new source review permit, Permit Number R10TNSR00200.

Permit Condition 15.3 limits the particulate matter (PM) emissions from miscellaneous non-fugitive activities to 0.1 gr/dscf and describes the emission testing method for determining compliance. For detailed analysis of emission factors and projected PM emissions, see Appendix A of the Permit Analysis for Permit Number R10TNSR00200.

5. Public Participation

5.1 Public Notice and Comment

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

1. Posting the public notice, draft permit, statement of basis and the draft administrative record (which includes the application and relevant supporting materials) on EPA's website for the duration of the public comment period.
2. Providing a copy of the public notice to: the permit applicant, the affected states, the air pollution control agencies of affected states, the Tribal, city and county executives, any comprehensive land use planning agency, any state or federal land manager whose lands may be affected by emissions from the source, the local emergency planning authorities which have jurisdiction over the area where the source is located and all persons who submitted a written request to be included on the EPA's mailing list for title V permitting actions.

5.2 Response to Public Comments and Permit Issuance

The public comment process was held as described above. No requests for a public hearing were received. No comments were received during the public comment period. Because no comments were received, the final permit decision becomes effective immediately upon issuance pursuant to 40 CFR 71.11(i)(2)(iii).