

STATEMENT OF BASIS

To: Reviewers

Through: Lori Bocchino, Operating Permit Program Manager

From: Maggie Endres, Operating Permit Program

Subject: Draft Chapter 6, Section 3 Operating Permit 3-3-107, Neiman Sawmills,
Hulett Mill

Date: May 13, 2011

Introduction:

Attached for your review is the draft renewal of the Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 Operating Permit 3-3-107 for the Hulett Mill. The mill is a lumber mill and planing facility capable of producing up to 45 million board-feet per year. Emission sources include three Wellons hog fuel boilers, three boiler target box vents, and a wood flour system baghouse.

Permitting History:

Permits CT-62 (9/24/76) and OP-40 (1/6/78): granted approval to construct and operate a 14.8 MMBtu/hr boiler plant (HFB-1).

Permit CT-723 (1/27/87): was issued for the construction of a 20 MMBtu/hr wood fired boiler. According to a Division memo dated 12/7/95, the boiler has been retired.

Permit CT-788 (5/10/88): allowed construction of a second 14.8 MMBtu/hr wood waste boiler (HFB-2). The permit limits particulate emissions to 0.10 lb/MMBtu as specified in WAQSR Ch 3, Sec 2(h), and the allowable opacity to 20 percent. The intention of this condition was to limit both particulate and opacity emissions as described in the regulation. The opacity limitation from Ch 3, Sec 2(h), which is 20 percent and allows 40 percent opacity for not more than two minutes per hour, has been applied to the boiler in the previous operating permits and will remain so in this renewal of the permit.

Permit CT-1065 (12/27/93): allowed construction of a 29.87 MMBtu/hr wood fired boiler (HFB-3). The permit limits particulate emissions to 0.10 lb/MMBtu, and the opacity to 20 percent, as specified in Ch 3, Sec 2(h).

Waiver AP-0232 (10/11/02): allowed construction of a sawdust drying system. The waiver limits unit HFB-1 particulate emissions to 0.10 lb/MMBtu maximum two hour average, and opacity to 20 percent except that 40 percent is permitted for not more than two minutes in any hour.

Waiver AP-0818 (5/7/03): allowed construction of a wood flour system. The waiver requires emissions from all components of the wood flour system be controlled with a baghouse (unit WF-1). Opacity from the baghouse and all other components of the wood flour system is limited to 20 percent. The permittee must document that Carter-Day model RJ filters or equivalent are used, and

that the baghouse is operated and maintained per manufacturer's instructions. Wood flour is sold as a product, and the presence of the wood flour baghouse is inherent process equipment. Therefore, the baghouse is not subject to Compliance Assurance Monitoring requirements.

Applicable Requirements

In addition to the permit requirements listed above, the 29.87 MMBtu/hr boiler is subject to 40 CFR 60 Subpart Dc requirements. Currently, the main requirement under this subpart is to record the amounts of fuel combusted on a daily basis as described in §60.48c(g). All three boilers are subject to the requirements of 40 CFR 63 Subpart JJJJJ. As sawdust fired boilers in the subcategory of biomass units, the subpart currently requires a one-time energy assessment and biennial tune-up of the boilers.

Periodic Monitoring

Periodic monitoring for the three boilers will consist of quarterly Method 9 observations by an inspector certified in accordance with the requirements of Method 9, and weekly visual emissions observations of the boilers. Particulate testing for the boilers will be conducted at least once every five years. Weekly Method 22-like observations will be conducted on the three boiler target box vents, and the wood flour system baghouse. Observations of any visible emissions will prompt corrective action and maintenance. Emissions are not expected from the target boxes.