Tom Peterson:

Swanson Group in Roseburg - (10-0030), old kipper boiler, multiclones, regularly over 20%, testing for grain at 0.15 then 8% opacity, testing was unusual, have better fuel and test in summer, wetter in winter. Visible from freeway -5 (on east side), look into sun and really looks bad, get calls from other program people at DEQ, looks like 70% into sun. More like 35% . Not a major HAP source so boiler MACT will not apply. Just used for dry kilns, Synthetic Minor for haps. Will source test this summer. Firebox is too small. If they run at half capacity, then it runs okay but bad at higher production. As high as 3000 ppm CO - burning badly Name plate is 40,000 lb/hr but permit has 31,800 lb/hr limit because they haven’t shown they can operate at higher production. Business pretty slow now, not running at capacity. Earthquake in Chile shut down some sources so plywood is in more demand now. Glide shutdown its sawmill but still has the boilers and kilns. Roseburg could haul the wood and dry it at Glide, which can meet limits. Roseburg should add controls or change boilers (maybe get a used one).

Swanson knows lower limits are coming. Tom has talked to them for years about it. They considered replacing the boiler with a high pressure boiler and get business energy tax credits. Douglas County Forest Products did this but is having problems getting it to work right. Problems with turbine operation w/o steadier load (drying cycle changes steam demand).

Emerald forest products has burley scrubbers and can meet opacity. They also have a firing limit in their permit that is lower than the nameplate because they haven’t proved they can meet the limits at a higher firing rate. Martin Abst is the inspector.

A 3 year schedule would be good for implementing controls.

Even 0.10 is hard! Instead of 0.1

10-0045 in Glendale has old boiler with ESP (added 6-7 years ago, works well). Not considered a modification because the ESP **reduced** emissions. Used to have 40% and 0.2 grain loading. They vent veneer dryer through the \_\_\_\_. The permit has 20% max opacity w/10% average….same with Roseburg Forest Products. Gary let them keep the higher opacity. If the equipment is part of a process, you can apply the limit for last piece of equipment. Glendale said they recover heat by venting the veneer dryer through the boiler. Swanson said they control VOCs from veneer dryers by venting through the boiler. The ESP should have no visible emissions. Can also meet 0.1 but 0.2 is in permit. Looked at new boilers in better economic times. Glendale’s boiler is 75 years old ( riveted drum). Someone is threatening to condemn the boiler because the rivets come out.

Gary Andes

Frank Lumber (sawmill): hog fuel boiler (35,000 lb/hour steam) in 1969 with multiclones. 40% and 0.2 grain loading. Last 4 source tests are under 0.2 (0.137, .137, .178, .19 oldest) combustion improvements on boiler but not much better. Can meet 40%, borderline for 20%, hard to read – need to read in morning, big hill behind. Mill City near Detroit. Boiler provides steam to kilns to dry wood. Possibly replacing boiler (using wood pellets). Frank lumber makes pellets. Down on production maybe 80%. Wouldn’t need increase in PSEL – unassigned on PM, PM10 and CO. To increase production, need to put in sawmill, then more dry kilns and then new boiler. 90MM board feet through kiln (capacity). One plant outfit. May be over 20% all the time…..40% for 6 minutes probably would not help. Not subject to MACT (not a major source of HAPs)

Time frame – 3 year period for MACT? Add on ESP (small one). Not making money. Gary has told them for several years that PM2.5 is coming…they don’t want to know.

NSPS trigger - modification and **increase** in emissions so NSPS applies. Everyone modifies and adds better control so not subject to NSPS. Will not make any changes so won’t trigger.

Gary recommends 3 years.

SOOT BLOWING AND GRATE CLEANING – excess emissions cover these maintenance procedures. If maintenance is submitted in the plan, then keep excess emissions covered in plan. Do we need soot blowing and grate cleaning in separate rule? No, keep it covered in excess emissions.

BOILER MACT? Would probably address opacity and grain loading.

Reovery boiler (combustion boiler MACT) is 20%....can meet 35%!!!!!!!!!!! All pulp mills have to meet combustion MACT. Corrective action level is 20%, not a limit. Modification to recovery furnace in DEQ rules, then 0.044. But MACT is 0.044 grain loading.