4.4.4 40 CFR 60 Subpart Db - Industrial, Commercial, and Institutional Steam Generating Units

NSPS Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, applies to industrial, commercial, and institutional steam generating units with a heat input greater than 100 MMBtu/hr that began construction, modification, or reconstruction after J une 19, 1984.* The dryer burner has a maximum heat input capacity of 100 MMBtu/hr. Moreover, the unit will not generate steam for process operations and does not meet the definition of a steam generating unit subject to this regulation. Therefore, the dryer will not be subject to the requirements of NSPS Subpart Db.

4.4.5 40 CFR 60 Subpart Dc - Small Industrial, Commercial, and Institutional Steam Generating Units

NSPS Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, applies to steam generating units with a maximum heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. The applicability date for NSPS Subpart Dc is J une 9, 1989. The dryer burner has a maximum heat input capacity of 100 MMBtu/hr and is in the range of heat input capacities regulated under NSPS Subpart Db. However, the dryer will be used to generate heat for drying wood and will not be utilized to generate steam for process operations, and hence does not meet the definition of a steam generating unit regulated under this rule. Therefore, the dryer system will not be subject to the requirements of NSPS Subpart Dc.

4.4.6 40 CFR 60 Subpart E - Incinerators

NSPS Subpart E, *Standards of Performance for Incinerators*, applies to incinerators with a charging rate of 50 tons/day for which construction or modification commenced after August 17, 1971. An incinerator is defined as any furnace used in the process of burning solid waste for the purpose of reducing the volume of the waste by removing combustible matter. The dryer burner, RTO, and RCO at the Adel Facility will not combust solid waste; therefore, this subpart is not applicable.

4.4.7 40 CFR 60 Subpart IIII - Compression Ignition Internal Combustion Engines

NSPS Subpart IIII applies to stationary compression ignition (CI) internal combustion engines (ICE) manufactured after April 1, 2006. Renewable Biomass Group will install a diesel-fired emergency fire pump. This regulation is potentially applicable to the diesel-fired pump engine, which is anticipated to be rated between 175 hp to 300 hp. The proposed unit meets the definition of emergency stationary ICE in 40 CFR 60.4219. Per the NSPS, a fire pump engine is defined as "emergency stationary internal combustion engine certified to National Fire Protection Association (NFPA) requirements that is used to provide power to pump water for fire suppression or protection." The unit is a fire pump engine that will be certified to National Fire Protection Association (NFPA) requirements.⁶

4.4.7.1 Emission Limits

Per 40 CFR 60.4202(a)(2), the emergency use fire pump engine must meet the requirements of 40 CFR 89.112 and 113. The engine has been certified by its manufacturer to be in compliance with these emission standards.

6 40 CFR 60.4219