



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

May 4, 2007

**Certified Mail No. 7005 1160 0000 1550 8944**

Mr. Vernon Porter  
General Manager, Power Production  
Idaho Power Company, Salmon Substation  
1221 West Idaho Street  
Boise, Idaho 83702

RE: Facility ID No. 059-00007, Idaho Power Company, Salmon  
Final Tier II Operating Permit Letter

Dear Mr. Porter:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2- 060525 for the Idaho Power Company facility located in Salmon, in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

This Tier II permit is effective immediately and replaces your previous permit issued on January 25, 2002. Please note that this permit expires five years after the issuance date.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Rensay Owen of the Idaho Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office at 900 N. Skyline, Idaho Falls, ID 83402.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Tracy Drouin at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Mike Simon".

Mike Simon  
Stationary Source Manager  
Air Quality Division

MS/TD/bf      Permit No. T2-060525

Enclosure

c: Rensay Owen, Idaho Falls Regional Office  
Tracy Drouin, Permit Writer  
Bill; Rogers, Permit Coordinator  
Marilyn Seymore/Pat Rayne, Air Quality  
Laurie Kral, EPA Region 10  
Permit Binder  
Source File  
Phyllis Heitman (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
TIER II OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-060525  
**FACILITY ID No.:** 059-00007  
**AQCR:** 63                      **CLASS:** SM80  
**SIC:** 4911                      **ZONE:** 12  
**UTM COORDINATE (km):** 273.3, 5007.2

**1. PERMITTEE**  
Idaho Power Company, Inc.

**2. PROJECT**  
Salmon Substation

<b>3. MAILING ADDRESS</b> 1221 West Idaho Street	<b>CITY</b> Boise	<b>STATE</b> Idaho	<b>ZIP</b> 83702
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<b>4. FACILITY CONTACT</b> F. Gregory Hall	<b>TITLE</b> Principal Engineer	<b>TELEPHONE</b> (208) 388-2506
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<b>5. RESPONSIBLE OFFICIAL</b> Vernon Porter	<b>TITLE</b> General Manager, Power Production	<b>TELEPHONE</b> (208) 388-2850
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<b>6. EXACT PLANT LOCATION</b> T3N, R2E, Section 27 (ST. Charles Street, Salmon, Idaho)	<b>COUNTY</b> Lemhi
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Generation and Distribution of Electricity

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 through 410, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

TRACY DROUIN, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

<b>Date Issued:</b>	May 4, 2007
<b>Date Expires:</b>	May 4, 2012

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES .....	3
1. TIER II OPERATING PERMIT SCOPE.....	4
2. FACILITY-WIDE CONDITIONS .....	5
3. TWO 2.75-MW DIESEL-FIRED GENERATORS .....	8
4. SUMMARY OF EMISSION RATE LIMITS .....	10
5. TIER II PERMIT TO OPERATE GENERAL PROVISIONS .....	11

## Acronyms, Units, and Chemical Nomenclatures

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM80 pollutant	synthetic minor with emissions above 80 T/yr, but less than 100 T/yr for any criteria air
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

**1. TIER II OPERATING PERMIT SCOPE**

***Purpose***

- 1.1 This Tier II operating permit establishes facility-wide requirements to limit the facility’s potential to emit below PSD and Title V major source thresholds and to comply with ambient air quality standards in accordance with Rules for the Control of Air Pollution in Idaho.
- 1.2 This Tier II renewal replaces Tier II Operating Permit No. 059-00007, issued January 25, 2002, the terms and conditions of which no longer apply.

***Regulated Sources***

- 1.3 Table 1.1 lists sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control(s)
3	<u>Generator West</u> Manufacturer: EMD of General Motors Company Model: 20-645E-E4 Rated heat capacity: 26.036 MMBtu/hr Burner type: Internal Combustion Fuels: No. 1 or No. 2 fuel oil	<u>None</u>
3	<u>Generator East</u> Manufacturer: EMD of General Motors Company Model: 20-645E-E4 Rated heat capacity: 26.036 MMBtu/hr Burner type: Internal Combustion Fuels: No. 1 or No. 2 fuel oil	<u>None</u>

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<b>Location:</b>	Salmon, Idaho	

**2. FACILITY-WIDE CONDITIONS**

***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee’s assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly, facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee’s assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

***Odors***

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Visible Emissions***

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly, facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

***Open Burning***

- 2.9 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-616.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

***Reports and Certifications***

2.10 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit, shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Idaho Falls Regional Office  
900 N. Skyline, Suite B  
Idaho Falls, ID 83402  
Phone: (208) 528-2650  
Fax: (208) 528-2695

***Obligation to Comply***

2.11 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

***Fuel-burning Equipment***

2.12 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

***Sulfur Content***

2.13 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.
- ASTM Grades 4, 5 and 6 fuel oil – 1.75% by weight.

2.14 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.

The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as received basis.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

**3. TWO 2.75-MW DIESEL-FIRED GENERATORS**

**3.1 Process Description**

Two 2.75-MW diesel-fired generators installed in 1967 provide stand-by power and a portion of the base load of electricity in the Salmon, Idaho area.

***Emissions Limits***

**3.2 Emission Limits**

The PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions from the generators shall not exceed any corresponding emissions rate limits listed in Table 3.2.

**Table 3.1 DIESEL-FIRED GENERATORS EMISSIONS LIMITS**

Source Description	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Two 2.75 MW Generators	3.8	4.9	12.6	6.4	198.1	99.2	41.8	23.4

**3.3 *Visible Emission Limits***

Visible emissions from either generator stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625.

***Operating Requirements***

**3.4 Fuel Burning Throughput Limits**

The maximum amount of fuel burned shall not exceed 392,392 gallons per any consecutive 12-month period.

**3.5 Fuel Oil Requirements**

The generators shall be fired on ASTM Grade 1 or ASTM Grade 2 distillate diesel fuel exclusively.

- Sulfur content of the ASTM Grade 1 fuel oil must not exceed 0.3% by weight.
- Sulfur content of the ASTM Grade 2 fuel oil must not exceed 0.5% by weight.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

***Monitoring and Recordkeeping Requirements***

**3.6 Fuel Usage**

The permittee shall monitor and record the total fuel usage in gallons for each generator at the Salmon Substation on a monthly basis. This information shall be kept onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

**3.7 Fuel Sulfur Content**

The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as received basis.

***Reporting Requirements***

**3.8 Reporting Requirement**

The permittee shall submit semi-annual reports to DEQ. The initial semi-annual report shall be postmarked by the 30<sup>th</sup> day of the sixth month following the issuance of this permit. Each subsequent report shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period. Each report must contain the information required in permit conditions 3.6 and 3.7.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

**4. SUMMARY OF EMISSION RATE LIMITS**

Table 4.1 provides a summary of all emission rate limits required by this permit.

**Table 4.1 SUMMARY OF EMISSION RATE LIMITS**

Idaho Power Co., Inc., Salmon Emission Limits <sup>a</sup> – Hourly (lb/hr), and Annual <sup>b</sup> (T/yr)								
Source Description	PM <sub>10</sub> <sup>c</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Two 2.75 MW Generators	3.8	4.9	12.6	6.4	198.1	99.2	41.8	23.4

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>c</sup> Includes condensibles

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
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**5. TIER II PERMIT TO OPERATE GENERAL PROVISIONS**

***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

**[Idaho Code §39-101, et seq.]**
  
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 5/1/94]**
  
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-060525**

<b>Permittee:</b>	Idaho Power Company, Inc.	<b>Facility ID No. 059-00007</b>
<b>Location:</b>	Salmon, Idaho	

- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

***Performance Testing***

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

***Monitoring and Recordkeeping***

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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<b>Location:</b>	Salmon, Idaho	

***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.  
[IDAPA 58.01.01.130-136, 4/5/00]

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.  
[IDAPA 58.01.01.123, 5/1/94]

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.  
[IDAPA 58.01.01.209.06, 4/11/06]

***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.